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## 4 Punt Road, Emu Plains

### Alterations and additions to former Police Station & Residence and change of use as a Café.

## STATEMENT OF ENVIRONMENT EFFECTS

Prepared for: Penrith City Council

Issued: 29<sup>th</sup> September 2020

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### 1. Introduction

This *Statement of Environmental Effects* (SOEE) provides an analysis of a proposal for changes to the former Police Station and Residence at No. 4 Punt Road, Emu Plains. The proposal involves the change of use to commercial uses, alterations and additions (external and internal), upgrading of services and amenities, provision of equitable access and fitout for café use.

This report was prepared by Jessica Kroese and Kate Denny of this office (see attached CV) with review by Sean Johnson. The site was inspected by Sean Johnson and Eleanora Caudai in July 2020.

The Former Police Station and Residence is listed in Schedule 5 of the *Penrith Local Environmental Plan 2010* as a local heritage item (Item No. 52). It is not located within a Heritage Conservation Area. A separate *Statement of Heritage Impact* has been prepared covering heritage aspects for the proposal.

#### 1.1. Description of the Subject Property

The subject property at No. 4 Punt Road is located in the suburb of Emu Plains, within the local government area of Penrith City Council, in the Parish of Strathdon, County of Cook.

The real property definition of No. 4 Punt Road is Lot 7038 DP 94188. (See Figure 2).

The allotment is Crown Land (Reserve 90020 reserved for Future Public Requirements notified 7<sup>th</sup> April 1972) and is licensed to Penrith City Council under the *Crown Lands Management Act 2016* (License No. 619912).

The property is located on the southern side of Punt Road, east of the intersection with the Great Western Highway and River Road, in the north-eastern corner of River Road Reserve (see Figure 1.1).

The property is bounded by Punt Road to the north and undeveloped, public reserve lands to the south, east and west. Directly to the north (across Punt Road) is the historic property, Emu Hall and directly to the east is the shared pedestrian/cycle bridge over the Nepean River, the Yandhai Nepean Crossing.

The allotment contains a weatherboard with corrugated metal roof single storey cottage constructed in 1908 and weatherboard double privy (of a similar date), the remains of garden beds and pathways and tree plantings. The front property boundary is defined by a recent timber paling fence with metal gates for vehicle access and pedestrian access. The eastern boundary is defined by the remnants of a timber post and wire fence, while fencing to the south and west boundaries has been removed.

Vehicle access to the allotment is available via the northern frontage, off Punt Road. In addition, the immediately adjacent allotment to the west (No. 28 Great Western Highway) also has vehicle access off Punt Road and is also used to gain access to the subject property.

As the property is currently vacant, the cottage and privy are enclosed with security fencing and due to recent vandalism, the windows and doors of the cottage have been sheeted over with plywood boards to increase security.

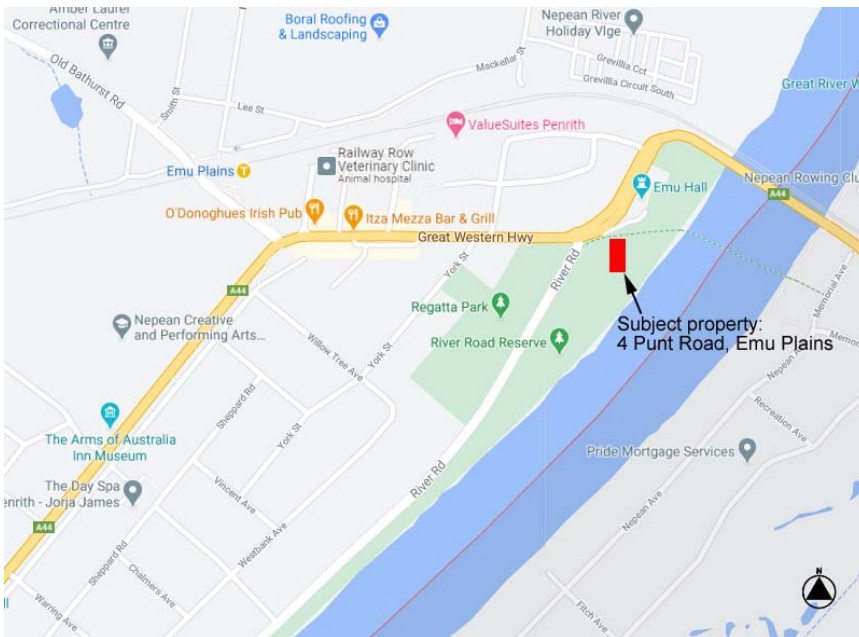


Figure 1: Map showing the location of the subject property at No. 4 Punt Road, Emu Plains. Source: GoogleMaps, 2020



Figure 2: Aerial view of the subject property (outlined in orange) showing the cadastral boundaries and immediate surrounds. The real property definition of the allotment is Lot 7038 DP 94188. Source: NSW Spatial Services, SixMaps, 2020

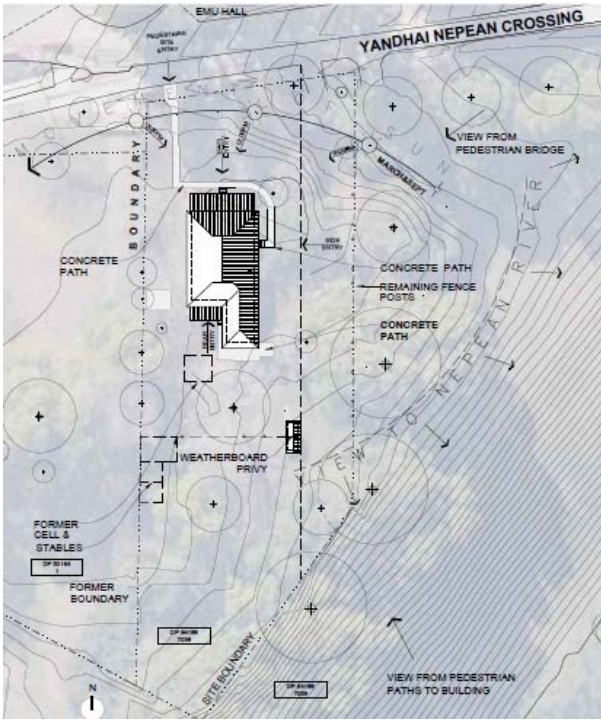


Figure 3: Detail from Drawing No. 124010/11B, Context and Analysis Plan, prepared by Lucas Stapleton Johnson & Partners, September 2020.

### Recent Photographs



Figure 4: Punt Road, looking west towards the Great Western Highway. The front (north) fence boundary of 4 Punt Road is to the left of frame.



Figure 5: Western elevation of the former Police Station Residence, looking across the adjacent allotment.



Figure 6: Front (north) elevation of former Police Station Residence.



Figure 7: Southern (rear) elevation of former Police Station Building and location of proposed extension.



Figure 8: Southern (rear) elevation of former Police Station Building.



Figure 9: East elevation of former Police Station with original main entry.



Figure 10: The original weatherboard double privy located in the rear garden of the allotment.



Figure 11: Interior view of existing kitchen looking north (room 8).



Figure 12: Interior view of existing kitchen looking south (room 8).



Figure 13: Interior view of existing living room (room 5), looking east.

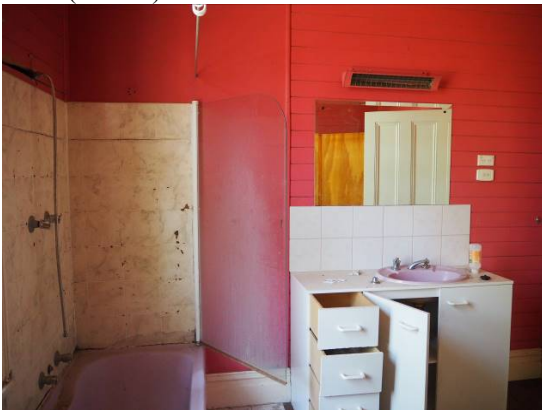


Figure 14: Interior view of existing bathroom (room 4).



Figure 15: Interior view of existing bedroom (room 1), looking southeast.

## **1.2. Present and Previous Uses**

The building was initially used as a Police Station and Residence for the Emu Plains Police until c1921, after which time it was in use as a single private residence, leased through Penrith City Council. The property is currently vacant.

## **2. The Proposal**

### **2.1. Documents Describing the Proposal**

The proposed works are described in the following documents:

- Drawings by Lucas Stapleton Johnson and Partners:
  - 124010/10/A – Index, dated 14<sup>th</sup> September 2020;
  - 124010/11/B – Context and Site Analysis Plan, dated 14<sup>th</sup> September 2020;
  - 124010/12/A – As Existing Plan, dated 5<sup>th</sup> August 2020;
  - 124010/13 – As Existing Elevations, dated 5<sup>th</sup> September 2020;
  - 124010/14/B – Proposed Site Plan, 14<sup>th</sup> September 2020;
  - 124010/16 – Proposed Plan, 14<sup>th</sup> September 2020;
  - 124010/18 – Proposed East and South Elevations, 14<sup>th</sup> September 2020;
  - 124010/19 – Proposed North and West Elevations, 14<sup>th</sup> September 2020;
- Schedule of Works, prepared by Lucas Stapleton Johnson & Partners and dated 23<sup>rd</sup> September 2020;
- Cost Estimate, prepared by A & DR Illes Pty. Ltd. and dated 20<sup>th</sup> February 2019.
- Statement of Heritage Impact, prepared by Lucas, Stapleton, Johnson & Partners, dated September 2020;
- Former Police Station and Residence, 4 Punt Road, Emu Plains Conservation Management Plan, prepared by Lucas, Stapleton, Johnson & Partners, dated February 2020;

### **2.2. Summary of Proposal**

In brief, the proposal involves the change of use of the former Police Station & Residence for commercial uses, alterations and additions, fitout for café use and upgrading of services and facilities. The proposal includes the following works (refer also to the Scope of Works accompanying this application for a detailed description of the works):

- Enclosure of the Rear Verandah with glazing to house the washing up area;
- Refit of Kitchen (room 8) with finishes and fittings compliant with commercial kitchen requirements;
- Alteration of former Bathroom (room 4) as a bar;
- Use of remainder of rooms in their original configuration as dining areas and service areas;
- Restore and refit existing weatherboard privy at rear for male and female toilets;
- Construction of a lean-to addition to the rear wing of cottage to accommodate a cold store and accessible WC;
- Construction of a timber and steel ramp to rear of site;
- Construction of a partially covered timber deck area on the eastern side of the house;
- Landscaping works, including provision of pedestrian paths.
- Temporary boundary fencing for construction zone and security

## **Exclusions**

The current proposal does not include the following:

- On-site car parking or vehicular access
- Registration of a food premises
- On-premises liquor license
- Operational details for the future use of the site as a café/restaurant (e.g. numbers of patrons, staff, hours of operation etc.)
- Signage
- External lighting

The above components of the proposed future use of the subject property are to be the subject of separate development applications and approvals.

## **3. Planning Controls and Planning Issues to be Considered**

The relevant planning instruments applicable to the above proposal include:

- *Crown Land Management Act 2016*
- *Sydney Regional Environmental Plan (SREP) No. 20 – Hawkesbury-Nepean River (No 2 – 1997)*
- *Penrith Local Environmental Plan (LEP) 2010*
- *Penrith Development Control Plan (DCP) 2014*

Pursuant to Section 4.15 of the *Environmental Planning & Assessment Act (EP&A Act) 1979*, the following sections assesses compliance with the planning instruments applicable to the site pursuant to the relevant matters for consideration.

### **3.1. Crown Land Management Act 2016**

The subject property is owned by the State of NSW and as such is Crown Land (Reserve 90020 reserved for Future Public Requirements notified 7<sup>th</sup> April 1972). The allotment is licensed to Penrith City Council under the *Crown Lands Management Act 2016* (License No. 619912).

Under the conditions of the License (Schedule 1 Item 4), the purpose for which the licensed area may be used is for *Site Investigations- Heritage site investigations and ground maintenance*.

It is noted that Penrith City Council has recently applied to become Crown Land Manager of the subject property and have requested that the allotment be reserved for the purpose of Public Recreation. This process has not as yet been finalised, pending the outcome of the native title status investigation, as per the requirements of the *Native Title Act 1993 (Cth)*.

Owners consent to the lodgement of the Development Application is required to be provided by the Department of Planning, Industry and Environment – Crown Lands.

### **Regatta Park Plan of Management**

The former Police Station and Residence, No. 4 Punt Road, Emu Plains is located within land that is known as Regatta Park.

Under Division 3.6 of the *Crown Land Management Act 2016*, Clause 3.38 allows for reserved Crown land to be used for a purpose in addition to the purposes for which the land is reserved, if the purpose is specified in a plan of management.

The *Regatta Park Plan of Management* was prepared on behalf of Penrith City Council by Clouston Associates in 2016 in accordance with the NSW Local Government Act 1993. A Plan of Management must define existing and future uses of the land as required under the *Local Government Act 1993* and the *Crown Land Management Act 2016* (formerly *Crown Lands Act 1989*).

Section 4.4 Master Plan Description of the *Regatta Park Plan of Management* provides for the future management and maintenance of Regatta Park, including the subject property.

No. 4 Punt Road is identified as being located within Zone 2- Dining Precinct (North east) of the parklands and the Plan of Management provides for the following in relation to the subject property:

- *The existing Police Cottage will be retained. There is potential for this building to be used as a visitor orientation node.*
- *The grass area near the Police Cottage could be used for overflow car parking during events, an event or function space for events associated with potential new uses associated with Emu Hall (such as weddings). The space could also be used for social and family gatherings, outdoor fitness, informal recreation etc. This is subject to negotiations with existing land owners.*

In order for the current proposal for the former Police Station & Residence to be implemented, the existing *Regatta Park Plan of Management 2016* needs to be revised and updated to make it compliant with the requirements of the *Crown Land Management Act 2016* and the *Local Government Act 1993*, and the *Regatta Park Plan of Management* will need to be specifically amended to provide for the nature and extent of the proposed future use of subject property as a café/restaurant.

It is noted that the *Regatta Park Plan of Management* is currently being reviewed by Penrith City Council.

### **3.2. Sydney Regional Environmental Plan (SREP) No. 20 – Hawkesbury-Nepean River (No 2 – 1997)**

*Sydney Regional Environmental Plan (SREP) No. 20 – Hawkesbury-Nepean River (No 2 – 1997)* applies to the subject site. According to Map 26 of the SREP, the subject property is located within the Middle Nepean & Hawkesbury River Catchment Area and is located within a Scenic Corridor of Regional Significance. The following policies and strategies of relevance apply to the current proposal:

#### **Part 2, Clause 6: Specific Planning Policies and Recommended Strategies**

<b>SREP Policy</b>	<b>Relevant Strategies</b>	<b>Comment</b>
<b>(2) Environmentally sensitive areas</b> The environmental quality of environmentally sensitive areas must be protected and enhanced through careful control of future land use changes and through management and (where necessary) remediation of existing uses.	Strategy (h) New development in conservation area sub-catchments should be located in areas that are already cleared.	The current proposal involves alterations and additions to an existing building, located within a domestic garden within public reserve lands that have already been cleared.

SREP Policy	Relevant Strategies	Comment
<p><b>(3) Water quality</b></p> <p>Future development must not prejudice the achievement of the goals of use of the river for primary contact recreation (being recreational activities involving direct water contact, such as swimming) and aquatic ecosystem protection in the river system.</p>	<p>Strategy (f) Consider the need for an Erosion and Sediment Control Plan (to be in place at the commencement of development) where the development concerned involves the disturbance of soil.</p>	<p>As the current proposal will involve minor excavation, an <i>Erosion and Sediment Control Plan</i> is to be prepared and submitted to Council prior to the issuing of the Construction Certificate.</p>
<p><b>(5) Cultural heritage</b></p> <p>The importance of the river in contributing to the significance of items and places of cultural heritage significance should be recognised, and these items and places should be protected and sensitively managed and, if appropriate, enhanced.</p>	<p>Strategies:</p> <p>(a) Encourage development which facilitates the conservation of heritage items if it does not detract from the significance of the items.</p> <p>(b) Protect Aboriginal sites and places of significance.</p> <p>(c) Consider an Aboriginal site survey where predictive models or current knowledge indicate the potential for Aboriginal sites and the development concerned would involve significant site disturbance.</p> <p>(d) Consider the extent to which heritage items (either identified in other environmental planning instruments affecting the subject land or listed in Schedule 2) derive their heritage significance from the river</p>	<p>The subject property is identified as a local heritage item in Schedule 5 of the Penrith LEP 2020. It is not identified as a heritage item under Schedule 2 of SREP No. 20.</p> <p>Refer to the Statement of Heritage Impact accompanying this application for details regarding potential heritage impacts.</p> <p><i>An Aboriginal Cultural Heritage Assessment and Historical Heritage Assessment and Statement of Heritage Impact</i> (Biosis, 2020) have been prepared for the whole of the Regatta Park Precinct, including the subject property and recently a S140 application for test excavations for archaeology has been approved by Heritage NSW.</p>
<p><b>(6) Flora and fauna</b></p> <p>Policy: Manage flora and fauna communities so that the diversity of species and genetics within the catchment is conserved and enhanced.</p>	<p>Strategy (b) Locate structures where possible in areas which are already cleared or disturbed instead of clearing or disturbing further land.</p>	<p>The current proposal involves alterations and additions to an existing building, located within a domestic garden within public reserve lands that have already been cleared.</p>
<p><b>(7) Riverine scenic quality</b></p> <p>Policy: The scenic quality of the riverine corridor must be protected.</p>	<p>Strategy (c) Consider the siting, setback, orientation, size, bulk and scale of and the use of unobtrusive, non-reflective material on any proposed building or work, the need to retain existing vegetation, especially along river banks, slopes visible from the river and its banks and along the skyline, and the need to carry out new planting of trees, and shrubs,</p>	<p>As above. The current proposal relates to an existing building located at the top of the river bank. No works are proposed to the river bank lands or slopes visible from the river.</p>



SREP Policy	Relevant Strategies	Comment
	particularly locally indigenous plants.	
<p><b>(11) Recreation and tourism</b></p> <p>Policy: The value of the riverine corridor as a significant recreational and tourist asset must be protected.</p>	<p>Strategies:</p> <p>(a) Provide a wide range of recreational opportunities along the river which are consistent with conserving the river's natural values and character.</p> <p>(b) Plan and manage recreational and tourist developments, and associated access points, cycleways and footpaths, so as to minimise any adverse environmental impacts on the river. Locate them where river banks are stable, away from river shallows, major beds of attached aquatic plants or fish breeding areas, where the proposed activities do not conflict with surrounding recreational activities and where significant flora and fauna habitats will not be adversely affected. The upgrading of existing public access to the river is to be preferred over the creation of new access points.</p> <p>(d) Consider the availability of, or need to provide, land for vehicle parking and for suitable access (including access for cars and buses), for boat service areas and for water, electricity and sewage disposal.</p> <p>(f) Consider the visual impact of development on the surrounding area.</p>	<p>The current proposal forms part of the broader redevelopment of the Regatta Park Precinct, which includes upgrading facilities for to provide a wide range of recreational opportunities. These works are being prepared in accordance with the <i>Regatta Park Plan of Management</i> (Clouston Associates, 2016)</p> <p>All works are contained within the existing allotment boundaries of No. 4 Punt Road and will have no impact on the river or river bank lands adjacent.</p> <p>Car parking requirements have been considered and will form part of the broader master plan design for the Regatta Park Precinct. No car parking is being provided within the allotment boundaries of No. 4 Punt Road.</p> <p>As the proposal involves only alterations and additions to an existing building and the works have been designed to be in keeping with the existing form, style and character of the former Police Station &amp; Residence, there will be no adverse visual impacts on the surrounding area.</p>

### Part 3, Clause 11: Development Controls

Under Clause 11 (2) Development requiring consent, any development that may be carried out only with development consent is indicated in the item by the words *Consent required*. In this case, the current proposal involves a number relevant development types that require development consent, as per below:

Development Type	Matters for Consideration	Comment
<p><b>(15) Land uses in or near the river</b></p> <p>All uses in the river or a tributary of the river, or within 40 metres of the high water</p>	<p>(a) The need to locate access points where riverbanks are stable, away from river shallows and major beds of attached aquatic plants, away from fishing grounds and fish</p>	<p>The current proposal involves works to an existing building located within a cleared landscape at the top of the slope leading down to the Nepean</p>

Development Type	Matters for Consideration	Comment
<p>mark of the river or a tributary of the river where it is tidal or within 40 metres of the bank where it is non-tidal. This includes clearing and the construction and use of piers, wharves, boat sheds or other structures which have direct structural connection to the bank or bed of the river or a tributary of the river.</p> <p><i>Consent required.</i></p>	<p>breeding areas, where the proposed activities do not conflict with surrounding recreational activities, and where significant fauna and wetland habitats will not be adversely affected.</p>	<p>River.</p> <p>No works are proposed that will impact on the natural environment of the river or river banks and the proposed use of the subject property will not conflict with surrounding recreational activities.</p> <p><i>An Erosion and Sediment Control Plan</i> is to be prepared and submitted to Council prior to the issuing of the Construction Certificate.</p>
<p><b>(16) Land uses in riverine scenic areas</b></p> <p>The following in scenic areas of the riverine corridor shown on the map as being of significance beyond the region (which are also scenic areas of significance for the region) or so shown as being of regional significance only:</p> <p>(a) subdivision,</p> <p>(b) clearing,</p> <p>(c) erection of a structure greater than 50 sq m in area or over 1 storey in height,</p> <p>(d) carrying out of works for the purpose of stabilising the riverbank.</p> <p><i>Consent required.</i></p>	<p>(a) The need to prevent large scale, high density or visually intrusive development on waterfront land or on slopes and ridgetops which are visible from the river or the surrounding visual catchment. (This requires consideration of the proposed form and siting of buildings, of the colours and building materials used, and of landscaping.)</p> <p>(c) Whether the development will damage the banks of the river or creeks.</p> <p>(d) Whether the development is adequately set back from the river.</p>	<p>The current proposal involves works to an existing building and the overall floor area of the building will equate to over 50 sq. metres in area.</p> <p>The proposal is not large scale or high density and will not be visually intrusive as the site is visually obscured from views from the river and surrounding visual catchment by existing tree plantings.</p> <p>No works are proposed to the river bank lands of the Nepean River and the existing setback of approximately 68 metres between the eastern allotment boundary of the subject property and the Nepean River will be retained.</p>
<p><b>(17) Sewerage systems or works</b></p> <p>Development for the purpose of any sewerage system or work which stores, treats or disposes of sewage (including domestic on-site disposal systems that are ancillary to development which requires consent) but not including a public utility undertaking.</p> <p><i>Consent required.</i></p>	<p>(a) Whether the proposed development will be capable of connection to a Sydney Water Corporation Limited or council sewerage system either now or in the future.</p>	<p>The subject property is already connected to the existing public sewerage system located in Punt Road. The current proposal involves the addition of new and additional toilet facilities and all works will utilise the existing system on site.</p>

### **3.3. Penrith Local Environmental Plan (LEP) 2010**

The *Penrith LEP* 2010 identifies the following relevant objectives and development controls in relation to the proposed works.

#### **Clause 2.3 Zone Objectives and Land Use Table**

The subject property is zoned RE1: Public Recreation. Uses permitted with consent under Zone RE1 include restaurants or cafes.

The proposal involves the adaptation of the existing former police station building for use as a café. The works proposed are required as part of this adaptation and are therefore permitted with consent under zone RE1.

#### **Clause 4.3 Height of Buildings**

No controls related to the height of buildings apply to the subject properties, as per *Height of Buildings Map Sheet HOB\_005*. This clause therefore does not apply.

#### **Clause 4.4 Floor Space Ratio**

No controls related to the floor space ratio apply to the subject properties, as per *Floor Space Ratio Map Sheet FSR\_005*. This clause therefore does not apply.

#### **Clause 5.10 Heritage Conservation**

The former Police Station and Residence located at No. 4 Punt Road is identified as a local heritage item on Schedule 5 of the *Penrith LEP* 2010 (item no. 52). It is not located within a Heritage Conservation Area.

Refer to the *Statement of Heritage Impact* accompanying this application for an assessment of the development under this clause.

#### **Clause 7.1 Earthworks**

The proposed works involve minor excavations for the construction of piles for the proposed deck, stormwater drains, sewer drain from privy, and general landscaping works.

Before granting development consent for earthworks, the consent authority must consider the following matters:

- (a) the likely disruption of, or any detrimental effect on, existing drainage patterns and soil stability in the locality,
- (b) the effect of the proposed development on the likely future use or redevelopment of the land,
- (c) the quality of the fill or the soil to be excavated, or both,
- (d) the effect of the proposed development on the existing and likely amenity of adjoining properties,
- (e) the source of any fill material and the destination of any excavated material,
- (f) the likelihood of disturbing relics,
- (g) the proximity to and potential for adverse impacts on any waterway, drinking water catchment or environmentally sensitive area,
- (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development,

- (i) *the proximity to and potential for adverse impacts on any heritage item, archaeological site, or heritage conservation area.*

As the current proposal will involve minor excavation, an *Erosion and Sediment Control Plan* is to be prepared and submitted to Council prior to the issuing of the Construction Certificate.

In addition, as the subject property is located within the broader Regatta Park Precinct, an *Aboriginal Cultural Heritage Assessment* and *Historical Heritage Assessment and Statement of Heritage Impact* (Biosis, 2020) have been prepared and recently a S140 application for test excavations for archaeology has been approved by Heritage NSW. The outcome of these test excavations will ensure the protection of the archaeological potential of the subject property and may require some adjustments to the proposed designs.

Refer also the *Statement of Heritage Impact* accompanying this application.

### **Clause 7.2 Flood Planning**

This clause applies to:

- (a) *land at or below the flood planning level,*  
(b) *land identified as “Flood planning land” on the Clause Application Map.*

The subject properties are not identified as being within a flood planning area, as per *Flood Planning Land Map – Sheet FLD\_005*. However, the subject properties are identified as being flood planning land as per *Clause Application Map – Sheet CAP\_001*.

As such, the following requirements of this clause apply to the subject properties:

- (5) *Development consent must not be granted for development on land identified as “Flood planning land” on the Clause Application Map, unless the consent authority is satisfied that the development will not adversely affect the safe and effective evacuation of the land and the surrounding area.*

The proposal involves alterations and additions to an existing building located within the “Flood Planning Land” to allow for the future use of the property as a café/restaurant. The proposal will not adversely affect the safe and effective evacuation of the land or the surrounding area.

Refer to the *Flood Management Plan* to be prepared in support of this proposal.

### **Clause 7.5 Protection of scenic character and landscape values**

The subject properties are not identified as being land with scenic and landscape values as per *Scenic and Landscape Values Map - Sheet SLV-005*. This clause therefore does not apply.

### 3.4. Penrith Development Control Plan (DCP) 2014

The *Penrith DCP* 2014 identifies the following design principles to be considered.

#### C1: Site Planning and Design Principles

Design Principle	Comment
<b>1.2.3 Building Form – Height, Bulk and Scale</b>	
(a) <i>Context: An applicant must demonstrate how all proposed buildings are consistent with the height, bulk and scale of adjacent buildings and buildings of a similar type and use.</i>	The current proposal involves alterations and additions to an existing building located within the Regatta Park Precinct. The works have been designed to complement the style, form and height of the existing building.
(b) <i>Character: An applicant must demonstrate how any building's height, bulk and scale will avoid or minimise negative impacts on an area's landscape, scenic or rural character (where relevant) taking into account the topography of the area, the surrounding landscape and views to and from the site.</i>	As per above. The proposed additions to the former Police Station and Residence, No. 4 Punt Road are consistent with the existing building's height, bulk and scale. The proposed works will not have negative impacts on the areas landscape or scenic character and will not impinge on existing available views into and out of the Regatta Park Precinct and surrounding public reserve lands.
(e) <i>Setbacks/Separations: Buildings should be sufficiently set back from property boundaries and other buildings to:</i>  <i>i) Maintain consistency with the street context and streetscape character, especially street/front setbacks;</i>  <i>ii) Maximise visual and acoustic privacy, especially for sensitive land uses;</i>  <i>iii) Maximise deep root planting areas that will support landscape and significant tree plantings integrated with the built form, enhancing the streetscape character and reducing a building's visual impact and scale;</i>  <i>iv) Maximise permeable surface areas for stormwater management; and</i>  <i>v) Minimise overshadowing</i>	<p>The current proposal involves the addition of a covered deck to the eastern elevation and the addition of a cool room and accessible WC to the southern (rear) elevation of the existing cottage. As such, there will be a minor reduction in setbacks to the eastern and southern property boundaries.</p> <p>However, the subject property is located within the northern portion of the public reserve lands of the River Road Reserve, part of the broader Regatta Park Precinct. There are no adjacent buildings, other than Emu Hall to the north, across Punt Road.</p> <p>As the former Police Station and Residence is a stand-alone building within the parklands, there is no established streetscape character or setbacks, there are no immediately adjacent residential buildings or overshadowing issues and the remainder of the allotment will be retained as landscaped area, with minimal hard paving.</p>

#### C2: Vegetation Management

Some vegetation and trees have already been removed as part of separate works by Council. This proposal does not involve the removal of any vegetation, however two Camellias are to be relocated within the property in order to accommodate the proposed new deck.

In this case, the a Conservation Management Plan has been prepared for the property (*Former Police Station & Residence, 4 Punt Road, Emu Plains Conservation Management Plan*, Lucas Stapleton Johnson & Partners 2020), which grades all landscape features within the allotment boundaries for their levels of significance. All trees identified as being of High significance are to be retained. Refer also to the *Statement of Heritage Impact* accompanying this application.

### **C3: Water Management**

#### ***3.2 Catchment Management and Water Quality***

As per Table C3.1, developments that are required to consider water Sensitive Urban Design include commercial uses in which alterations and additions result in an increase in roof area and impervious area equal to or greater than 250 metres<sup>2</sup>.

In this case the existing roof area of the cottage equates to 180 metres<sup>2</sup> and with the addition of the new rear extension, the overall roof area will equate to 190 metres<sup>2</sup>.

Therefore the provisions of this clause do not apply.

#### ***3.3 Watercourses, Wetlands and Riparian Corridors***

The proposed development is located within the Vegetated Riparian Zone Width of 90m for the Nepean River, as identified by Table C3.3.

Clause 4) Protection and Enhancement of Riparian Corridors requires the following for development within the riparian zone:

*c) In relation to activities within the vegetated riparian zone, such as cycleways and paths, detention basins, stormwater management devices and essential services, compliance is required with the 'riparian corridor matrix' in the NSW Office of Water's Guidelines for Riparian Corridors on Waterfront Land (July 2012).*

In this case, the current proposal involves paths and stormwater management and in accordance with the Guidelines (2012):

- Paths no wider than four metres total disturbance footprint can be built in the outer 50 per cent of the Vegetated Riparian Zone (VRZ); and
- Stormwater outlets or essential services are allowed in the Riparian Corridor (RC).

#### ***3.5 Flood Planning***

As the land is subject to the flood planning provisions of the *Penrith LEP 2010*, the following controls apply:

#### **7) Industrial/Commercial - Extensions and Infill Development**

*(a) Where the application is for an extension to an existing building on land at or below the flood planning level or for new development that can be classed as infill development, Council may approve of the development with floor levels below the 1% AEP (100 year ARI) flood if it can be demonstrated by the applicant that all practical measures will be taken to prevent or minimise the impact of flooding. In considering such applications and determining the required floor level, Council shall take into account such matters as:*

- i) The nature of the business to be carried out;*
- ii) The frequency and depth of flooding;*
- iii) The potential for personal and property loss;*
- iv) The utility of the building for its proposed use;*
- v) Whether the filling of the site or raising of the floor levels would render the development of the property unworkable or uneconomical;*
- vi) Whether the raising of the floor levels would be out of character with adjacent buildings; and*
- vii) Any risk of pollution of water from storage or use of chemicals within the building.*

*b) Any portion of the proposed building extension subject to inundation shall be built from flood compatible materials.*

Refer to the *Flood Management Plan* to be prepared in support of this proposal.

### **3.6 Stormwater Management and Drainage**

The following controls apply:

#### 1) Natural Environment

*a) Runoff must not be discharged into bushland areas, including threatened ecological communities.*

*b) Pipe outlets shall be treated with measures to dissipate stormwater velocity, except where waters enter a formed channel or similar structure that is unlikely to be damaged by water flowing in at high velocity.*

*c) Permeable ground surfaces are to be maintained as far as possible, and where suitable conditions exist, stormwater is to be infiltrated on-site.*

#### 2) Drainage

*b) The development of any lot should take into account the existing drainage patterns of the area, including any localised ponding, and whether the proposed development is likely to affect:*

*i) Access to the site;*

*ii) Drainage on adjoining properties;*

*iii) Localised nuisance flooding on adjoining properties; and*

*iv) Natural overland flow or drainage paths.*

*f) If the site has access to Council's stormwater drainage system, all roof and surface water that is not recycled for use on the site must be discharged into Council's stormwater drainage system. No surface drainage will be permitted to discharge across Council's footways or reserves or enter adjoining land.*

The current proposal involves a minor increase to the overall roof area of the existing building and includes the addition of a timber deck and brick pathways, therefore there will be some increase to the overall stormwater run-off as a result of the proposal.

For this proposal it is proposed to connect roof and surface water to Council's existing stormwater drainage system located to the north of the property in Punt Road. This will involve excavation within the allotment boundaries to connect to the existing system and the provision of surface grated drains.

As the timber deck and the brick paved pathway to the east of the cottage are permeable, any stormwater run-off generated as a result of these new features will be allowed to soak into the ground.

## **C5: Waste Management**

### **5.1 Waste Management Plans**

As the proposal involves a change of use of the building for commercial development, a waste management plan is required. Refer to *Waste Management Plan* accompanying this application.

## 5.2 Development Specific Controls

As the subject property is proposed to be adapted for use as a commercial venue, the following controls apply:

5.2.4 Non-Residential Development Controls	Comment
<p>3) <i>Waste storage and collection areas should be:</i></p> <p>a) <i>Flexible in their design so as to allow for future changes in the operation, tenancies and uses;</i></p> <p>b) <i>Located away from primary street frontages, where applicable;</i></p> <p>c) <i>Suitably screened from public areas so as to reduce the impacts of noise, odour and visual amenity; and Waste Management</i></p> <p>d) <i>Designed and located to consider possible traffic hazards (pedestrian/vehicular) likely to be caused by the storage and collection of waste.</i></p> <p>5) <i>Grease traps must be provided where there is a likelihood of liquid waste entering the drainage systems (contact Sydney Water to obtain trade waste requirements).</i></p> <p>8) <i>Should a collection vehicle be required to enter the property, the driveway and manoeuvring area must be suitable for a collection vehicle in terms of both its strength and design.</i></p>	<p>The current proposal includes the provision of a covered rubbish bin enclosure on the western elevation of the cottage, away from the primary street frontage (Punt Road) and adjacent to the proposed vehicle access point to the site. At this stage, vehicle access to the site will be provided for via the adjacent property to the west at No. 28 Great Western Highway via River Road. However, this scope of works is the subject of a future development application and forms part of the broader Regatta Park Precinct masterplan designs.</p> <p>The enclosure is to be clad in hardwood boards to and will be lined with metal to allow for the hosing out of the enclosure.</p> <p>At this stage, the proposed enclosure has been designed to accommodate two rubbish bins, the use of which will be determined by the future lessees of the property.</p> <p>The grease trap for the commercial kitchen is also to be located on the western side of the building, adjacent to rubbish bin enclosure, to allow easy access from the adjacent property to the west at No. 28 Great Western Highway, where service vehicles will be able to access the site.</p>

## C6: Landscape Design

As noted above, some vegetation and trees have already been removed as part of separate works by Council. This proposal does not involve the removal of any vegetation, however two Camellias are to be relocated within the property in order to accommodate the proposed new deck.

Other landscape design works include only the provision of a brick paved pathway along the eastern boundary of the property, providing pedestrian access from Punt Road and the Yandhai Nepean Crossing bridge into the property.

In this case, a Conservation Management Plan has been prepared for the property (*Former Police Station & Residence, 4 Punt Road, Emu Plains Conservation Management Plan*, Lucas Stapleton Johnson & Partners 2020), which grades all landscape features within the allotment boundaries for their levels of significance. All trees identified as being of High significance are to be retained. Refer also to the *Statement of Heritage Impact* accompanying this application.

New temporary boundary fencing is being proposed as part of this application for increased security to the property and to provide for a construction zone, once construction works are underway. As the subject property is located within the public reserve lands of the River Road Reserve, and the property is not currently fenced, it will be necessary to fence off the site during construction.

Therefore 1.8 metres steel post and wire mesh fencing will be installed on a temporary basis to the east, west and south boundaries and the existing timber paling fence along the north boundary will be



extended to a height of 1.8 metres. This fencing will only be in place in the interim during construction. Following construction, the fencing will be removed.

#### 6.1.4 Site Amenity

Development Control	Comment
<p>2) Open Space Requirements</p> <p>a) <i>The amount of open space is crucial to the landscape design. This amount will vary depending on:</i></p> <p>i) <i>The use proposed on the site;</i></p> <p>ii) <i>The requirements of the occupants;</i></p> <p>iii) <i>Character of the neighbourhood;</i></p> <p>iv) <i>Requirements in other sections of this DCP;</i></p> <p>v) <i>Retention of mature/significant trees/vegetation; and</i></p> <p>vi) <i>Whether the space is a private or public space</i></p> <p>d) <i>The design of a development should maximise solar access to all open spaces</i></p>	<p>The current proposal involves alterations and additions to an existing building that will increase the overall footprint by a very small amount.</p> <p>Overall, the available open space within the allotment will be essentially as it is currently. However, as the proposal involves the change of use to a commercial premises, there is little need for open recreational space within the allotment boundaries.</p> <p>As noted above, the current proposal includes the retention of all mature and significant trees and vegetation located on the site.</p> <p>The existing building is orientated north-south and existing tree plantings are to be retained. As such, solar access to the open spaces within the allotment boundaries will be retained as is.</p>
<p><u>4) Equal Access</u></p> <p>a) <i>In accordance with the Federal Disabilities Discrimination Act 1992 and the NSW Anti Discrimination Act 1977, and all relevant Australian Standards, the following design elements must be considered when designing any landscape projects to ensure equal access for people with disabilities:</i></p> <p>i) <i>Pedestrian routes;</i></p> <p>ii) <i>Tactile warning strips with a strong contrast to adjoining paving;</i></p> <p>iii) <i>Stairways/steps</i></p> <p>iv) <i>Landings;</i></p> <p>v) <i>Ramps;</i></p> <p>vi) <i>Handrails;</i></p> <p>vii) <i>Seating;</i></p> <p>viii) <i>Lighting;</i></p> <p>ix) <i>Signage</i></p> <p>x) <i>Luminance contrast of street and park furniture.</i></p>	<p>The current proposal includes the provision of equitable access facilities in accordance with AS 1428.1 – 2009 and includes the following:</p> <p>Wheelchair users and other less mobile visitors will be likely to arrive at the (future) carpark to the west at No. 28 Great Western Highway, where they will either park their vehicle in the provided accessible spaces or will be dropped off.</p> <p>An accessible route from the south-west corner of the cottage has been provided via a less than 1:20 sloped brick path leading to a timber and 1:14 steel ramp from the foot of the back verandah steps wrapping around the back wing and passing by the accessible w.c. to the new deck. Patrons can then enter via the ‘front’ door which is of the required clear width and will be provided with push-button operation for ease of opening from outside or in.</p> <p>A new opening in the south wall of room 1 to allow 1500mm turning circle for a wheelchair and widened the opening to room 5 has been provided, thus providing wheelchair access in accordance with AS1428 to the outdoor deck, rooms 1 and 5 only.</p> <p>Rooms 2, 3 &amp; 4 will not be accessible in a wheelchair but that is considered a good balance given the negative heritage impacts of widening doors and altering original fabric.</p>
<p><u>5) Heritage</u></p> <p>a) <i>Landscape designs must comply with any relevant requirements of the ‘Culture and</i></p>	<p>As stated above, a Conservation Management Plan has been prepared for the property (<i>Former Police Station &amp; Residence, 4 Punt Road, Emu</i></p>

Development Control	Comment
<p><i>Heritage' section of this DCP.</i></p> <p><i>b) If a site is listed as a heritage item or is within a heritage conservation area, a heritage impact statement may be required. The landscape design is to retain any natural, cultural or architectural features that are essential to the conservation of the heritage significance of the place. The landscape design should respect the importance of these heritage features, be of a sympathetic style and form, and should be influenced by any relevant heritage landscape evidence.</i></p>	<p><i>Plains Conservation Management Plan, Lucas Stapleton Johnson &amp; Partners 2020), which grades all landscape features within the allotment boundaries for their levels of significance. All trees identified as being of High significance are to be retained.</i></p> <p><i>Refer to the Statement of Heritage Impact accompanying this application.</i></p>
<p><b><u>7) Location of Utility Services</u></b></p> <p><i>The location of utility services, such as gas and electricity, can significantly impact upon existing vegetation and locations for proposed vegetation. As such, the following requirements are applicable:</i></p> <p><i>a) Common trenching for compatible underground services should be maximised to reduce repeated disturbance to established plantings.</i></p> <p><i>c) Selected plant species should not obstruct or interfere with infrastructure facilities having regard to:</i></p> <p><i>i) The mature height of trees and shrubs beneath overhead services; and</i></p> <p><i>ii) The root growth of trees and shrubs and underground services.</i></p> <p><i>d) Services should be located away from existing and proposed vegetation and their root zones</i></p>	<p>Refer to Dwg. Nos. 124010/14/B and 124010/16 showing the location of the existing sewer lines and proposed stormwater drainage system for the property. These utility services are located below ground and trenching will be required to connect these services. As shown on the plans, these works will have no impact on the existing trees.</p>
<p><b><u>8) Utility Areas</u></b></p> <p><i>a) Waste and recyclables storage facilities should be located behind the building line and not adjacent to communal outdoor seating/recreation areas.</i></p> <p><i>b) The storage area is to be suitably screened.</i></p>	<p>As discussed above, the rubbish bin enclosure and grease trap are both to be located on the western side of the cottage, behind the building line and no adjacent to communal outdoor seating areas.</p> <p>The rubbish bin enclosure is to be clad in hardwood boards in keeping with materials of the existing cottage and minimising visual impacts.</p>

**C7: Culture and Heritage**

Refer to *Statement of Heritage Impact* accompanying this submission.

## C8: Public Domain

As the subject property forms part of the public reserve lands of River Road Reserve and is public land (Crown land), the following provisions regarding public access apply:

Design Principles	Comment
<p><i>1) The location of building entrances and glazing should provide natural surveillance to the public domain without compromising passive solar design principles</i></p>	<p>The proposal involves works to an existing cottage that is listed as a local heritage item. The building entrance for the purposes of the proposed new use of the building as a café/restaurant will be the front verandah French doors located on the northern side of the building. Surveillance to the surrounding public domain lands will be retained via the existing configuration of doors and windows of the cottage.</p>
<p><i>2) The built form should provide, where it is appropriate, a visual transition to the public space by avoiding continuous lengths of blank walls and high fences at the interface between the public and private space;</i></p>	<p>The proposal involves works to an existing 1908, weatherboard cottage that is listed as a local heritage item. No blank walls are proposed as part of the works.</p> <p>A temporary 1.8m high security fence is to be provided around the cottage as part of the construction management zone. This fencing will be removed following the completion of the construction works.</p>
<p><i>3) Views into and from the public domain are to be protected as they increase opportunities for natural surveillance. Where appropriate, ground floor areas abutting public space should be occupied by uses that create active building fronts with pedestrian flow, and contribute to the life of the streets and other public spaces;</i></p>	<p>The current proposal will not impact on existing views into and out of the subject property to the surrounding public reserve lands.</p>
<p><i>4) Accessibility should be provided for all members of the community, particularly those with a disability, and should occur across all areas of the public domain. This includes designing for durability, adaptability, maintenance and replacement.</i></p>	<p>As discussed above, equitable access is to be provided in accordance with AS 1428.1 – 2009.</p>

## C10 Transport, Access and Parking

### 10.5 Parking, Access and Driveways

*Minimum parking requirements have been set by Council to ensure that development functions efficiently and there is limited impact on street parking and congestion. Car parking required by this DCP must be provided for onsite unless the consent authority is satisfied that adequate car parking is provided elsewhere.*

In this case, car parking and vehicular access does not form part of the current proposal. The subject property, No. 4 Punt Road, is located within the northern portion of the public reserve lands of the River Road Reserve and forms part of the broader Regatta Park Precinct.

Currently, Penrith City Council is preparing a landscape master plan for the upgrading of the whole of the Regatta Park Precinct, including the provision of car parking.

As the subject property is part of Regatta Park Precinct, Council plans to provide staff and visitor car parking, space for adequate manoeuvring of vehicles (including service vehicles) and accessible car spaces for No. 4 Punt Road within the adjacent property to the west, at No. 28 Great Western Highway. This work will form part of the landscape masterplan designs for the Regatta Park Precinct and be the subject of a separate development application.

## **Environmental Effects**

The following includes matters not addressed above:

### **Soil Erosion/Sediment Control**

A separate *Erosion and Sediment Control Plan* is to be prepared for this application.

### **Construction Management Plan**

A separate *Construction Management Plan* is to be prepared for this application.

### **Asbestos and Contamination**

Penrith City Council has already undertaken works associated with the removal of asbestos at the subject property. Refer to *Asbestos Clearance Inspection and Clearance Certificate*, prepared by Trinitas Group, dated 16<sup>th</sup> July 2020 accompanying this application.

### **Environmental Health**

As the current proposal involves the change of use to a food premises (café/restaurant) with the ability to serve liquor, additional approvals will be required. It is envisaged that the future lessee of the property will be responsible for these additional approvals. Further information to be provided to Penrith City Council in support of any new use at the subject property is as follows:

- On-premises liquor license (if required)
- Food Premises Registration Form
- types of activities and hours of operation
- number of patrons
- food processing to be carried out on the premises
- the types of food involved and the steps involved in food handling from food delivery to delivery of end-product to customers.
- site plan - to a suitable scale (eg 1:100) including car parking, waste storage area, adjacent land uses, grease trap, wash down areas and toilet facilities.
- floor plan - to a suitable scale (eg 1:50).
- sectional elevation drawings - to a suitable scale (eg 1:50) showing all fittings and equipment and finishes to floors, walls and ceilings.
- hydraulic plans (plumbing details) - to a suitable scale (eg 1:50) showing trade waste facilities such as sink screens, basket arrestors, grease traps and wash down areas that discharge to sewerage.
- mechanical exhaust ventilation drawings (ie plans, elevation and schematic diagrams, where applicable) - to a suitable scale (eg 1:50) or be able to demonstrate that the system will be designed in accordance with relevant standards.
- a waste and recycling management plan

## **Archaeology**

It is noted that a s140 application for test excavation for Aboriginal and historical archaeology has recently been approved by Heritage NSW covering the whole of the Regatta Park Precinct and including the subject property at No. 4 Punt Road. The testing is yet to be undertaken, however, depending on the outcome of these works and analysis, the current proposal may need to be adjusted to protect the archaeological potential of the site.

## **Conclusion**

Considering the above, the proposal will have, in our view, negligible adverse environmental effects on the building and its vicinity and **should be approved** by the consent authority having jurisdiction over it.



Kate Denny  
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Encls. CV KD

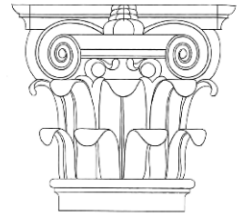
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## **CURRICULUM VITAE**

### **KATE DENNY BA, MHerit. Cons. (Hons)**

**Education:** University of Sydney, Masters of Heritage Conservation (Hons.), 2004  
University of Sydney, Bachelor of Arts (Anthropology, Art History), 1994

**Employment:** Lucas Stapleton Johnson & Partners as Heritage Planner since April 2010  
Taylor Brammer Landscape Architects as Heritage Assistant 2007 -2010  
Conybeare Morrison as Heritage Specialist, 2006  
Leichhardt Council as Development Assessment Assistant, 1999-2005

**Recent work includes:**

#### *Conservation Management Plans*

- Thompson Square Conservation Area, Windsor
- Macquarie Lightstation, Vacluse
- Hyde Park Barracks, Sydney
- Sydney General Post Office, Sydney
- Brisbane General Post Office, Sydney
- Roseneath Cottage, Parramatta
- Juniper Hall, Paddington
- No. 1 Fire Station, Castlereagh Street, Sydney
- Woolloomooloo Finger Wharf, Woolloomooloo
- Goods Island Lighthouse, Torres Straits
- Booby Island Lighthouse, Torres Straits
- Double Island Point Lighthouse, Queensland
- Milton Terrace, 1-19 Lower Fort Street, Millers Point
- Major House, 35 Lower Fort Street, Millers Point
- Vernon's Flats, 30-42 Lower Fort Street & 2-4 Trinity Avenue, Millers Point
- Steven's Building, 73 Windmill Street, Millers Point
- (former) Shipwright's Arms Hotel, 75 Windmill Street, Millers Point
- (former) Baby Health Centre, 87 Lower Fort Street, Millers Point
- (former) Hit or Miss Hotel, 69 Windmill Street, Millers Point
- Bronte House, Bronte
- Experiment Farm Cottage, Harris Park
- University of Sydney Grounds (Camperdown and Darlington campuses)
- Mallet Street Campus, University of Sydney
- Blackburn Building, University of Sydney
- Exeter Park and School of Arts Building, Exeter, NSW
- Mining Museum, George Street, The Rocks
- Braemar, Springwood
- Penshurst Street Baby Health Clinic (former), Penshurst
- Cabarita Federation Pavilion, Cabarita Park

- Penhurst Street Baby Health Centre, Penhurst
- Trinity Avenue and Kent Street (various), Millers Point

#### *Heritage Studies and Assessments*

- (former) HMAS Platypus, North Sydney
- Penrith Regional Gallery & the Lewers Bequest, Emu Plains
- Hunter Region Rural Homestead Complexes comparative study for the NSW Heritage Office
- Leura Post Office, Leura
- Wayzgoose Café, Leura Mall, Leura
- Our Lady of Mercy College, Parramatta
- Regent Theatre, Mudgee
- (former) Metropolitan Remand Centre, Glebe
- Gap Bluff, Sydney Harbour National Park, Watsons Bay
- Millers Point heritage strategy, Department of Family and Community Services
- Ku-ring-gai Council Review of Potential Heritage Items
- Kirribilli Village and Milson Point Railway Station, Ennis Road, Kirribilli
- Catherine Hill Bay Conservation Area Heritage DCP
- NSW Parliament House, Macquarie Street, Sydney
- Pier One, Walsh Bay
- Willoughby Council Heritage Review
- St Paul's College, University of Sydney
- St Andrew's Anglican Church, Summer Hill
- St Andrew's College, University of Sydney

#### *Interpretation Plans and Strategies*

- Queen Mary Building, University of Sydney
- New Law Building, University of Sydney

#### *Heritage Development Work (applications to consent authorities)*

- Glenfield, Casula
- Roseneath Cottage, Parramatta
- Telford Lodge (Place), 159 Brougham Street, Kings Cross
- Ennis Road shops and North Sydney Train Station Entry, Kirribilli
- Greenwich Baths, Lane Cove
- Craignairn, Burns Road, Wahroonga
- Craigmyle, Burns Road, Wahroonga
- Queen Mary Building, University of Sydney
- Sydney GPO, Martin Place, Sydney
- Former Police Station, 103 George Street, The Rocks
- St Keirans, Fairfax Road, Bellevue Hill
- Tresco, Elizabeth Bay
- Woolloomooloo Finger Wharf (residential component), Woolloomooloo
- Our Lady of Mercy College, Parramatta
- Blackburn Precinct and Vet Science Precinct, University of Sydney
- Donald Bradman's boyhood home, 52 Shepherd Street, Bowral
- Old AMP Building, Circular Quay
- Adelaide Villa, 48 Botany Street, Bondi Junction
- Lyndoch Place, 2 Barker Road, Strathfield
- Hazelmere, 49 Queen Street, Woollahra
- Lipson, 70 Jersey Road, Woollahra
- 198 Queen Street, Woollahra (former Woollahra Grammar School)
- Lane Cove Council (Heritage Assessment Officer services- ongoing)

#### *Assistance in preparing statements of evidence for NSW Land Environment Court:*

- Bidura and (former) Metropolitan Remand Centre, Glebe
- 139 Goods Street, Parramatta
- Lansdowne, 3 Anderson Street, Neutral Bay
- Hazelmere, 49 Queen Street, Woollahra

- Clovelly Hotel, Clovelly
- Banksia, 3 Beach Street, Double Bay

**January 2019**