Item: ENV034-21 PP2016/0002 - Amended Planning Proposal for the Hurstville

Civic Precinct

Author: Senior Strategic Planner, Manager Strategic Planning and Independent

Assessment

Directorate: Environment and Planning

Matter Type: Committee Reports

RECOMMENDATION:

- (a) That the Georges River Council endorse the Planning Proposal (PP 2016/0002) to amend the Hurstville Local Environmental Plan 2012 (HLEP 2012) (or if gazetted the *Georges River Local Environmental Plan*) as it applies to the Georges River Council owned site known as the Hurstville Civic Precinct Site, bound by Queens Road, Dora Street, MacMahon Street and Park Road which seeks to:
 - a. Amend the HLEP 2012 Land Zoning Map Sheet LZN_008A to remove the 'Deferred Matter' and rezone the site to B4 Mixed Use;
 - b. Amend the HLEP 2012 Height of Buildings Map Sheet HOB_008A to set:
 - i. a maximum height of 20 metres under the height designation of 'Q1' at the south western portion of the site;
 - ii. a maximum height of 30 metres under the height designation of 'U' at the south western corner of the site; and
 - iii. a maximum height of 60 metres under the height designation of 'AA' at the north eastern portion and south eastern corner of the site.
 - c. Amend the HLEP 2012 Maximum Floor Space Ratio Map Sheet FSR_008A to set:
 - i. a maximum FSR of 3:1 under the FSR designation of 'V' at the south western portion of the site;
 - ii. a maximum FSR of 7:1 under the FSR designation of 'AB' at the central/ north eastern portion of the site; and
 - iii. a maximum FSR of 5:1 under the FSR designation of 'Z' at the north eastern portion of the site.
 - d. Amend Schedule 4 of HLEP 2012 to reclassify Lot 13 in DP 6510 and Lot 14 in DP 6510 (i.e. former Baptist Church and adjoining land, known as 4-6 Dora Street) from 'community' to 'operational' land.
 - e. Amend HLEP Active Street Frontages Map Sheet ASF_008A by deleting the red line identifying 4-6 Dora Street (Lot 13 in DP 6510 and Lot 14 in DP 6510) as having active street frontage.
 - f. Amend HLEP 2012 by including the heritage item (Item I157) listed in Schedule 2 of the HLEP 1994 within Schedule 5 (Environmental heritage) of HLEP 2012 and amend Heritage Map Sheet HER_008A to identify the same Item on the map.
 - g. Amend HLEP 2012 by inserting a development standard under Part 6 Additional Local Provision as follows:

6.10 Hurstville Civic Precinct

- (1) The objective of this clause is to facilitate the provision of community facilities and public benefits on the Hurstville Civic Precinct site.
- (2) This clause applies to land bounded by Queens Road, Park Road, MacMahon Street and Dora Street.
- (3) Development consent must not be granted on land to which this clause applies unless the consent authority is satisfied that the development will include:
 - (a) Residential land uses to a maximum of 55% of the total permissible GFA; and
 - (b) Community uses and facilities to a minimum of 25% of the total permissible GFA; and
 - (c) Public open space at ground level to a minimum of 50% of the total site area inclusive of a civic plaza that receives an average of 50% direct sunlight between 11 am and 2pm midwinter; and
 - (d) Car parking for general public use that is additional to the requirements for all land uses.
- (4) For the purposes of this clause, community facilities for Hurstville Civic Precinct site means Council administrative and civic offices; multipurpose auditorium, library, museum, art gallery, community centre, associated uses such as cafés; a range of recreation, relaxation or study areas; and any other use that Council may consider appropriate to meet the needs of the community.
- (b) That Georges River Council forward the Planning Proposal (PP 2016/0002) to the delegate of the Minister for Planning requesting a Gateway Determination under Section 3.34 of the Environmental Planning and Assessment Act 1979 (EP&A Act).
- (c) That should a Gateway Determination be issued by Department of Planning, Industry and Environment to permit exhibition of the Planning Proposal, a public hearing take place in accordance with the provisions of the NSW Local Government Act 1993 and the DPIE's Practice Note PN 16-001 Classification and Reclassification of Public Land through a Local Environmental Plan.
- (d) That the Planning Proposal be placed on formal public exhibition in accordance with the conditions of any Gateway Determination issued by the Department of Planning, Industry and Environment.
- (e) That prior to the public exhibition of the Planning Proposal as part of any successful Gateway determination, the following documents are prepared by the Proponent in order that they form part of the public exhibition:
 - a. A Civic Precinct Public Amenities and Facilities Strategy.
 - b. A Civic Precinct Public Domain Plan Strategy.
 - c. A Conservation Management Plan (CMP) prepared for the Hurstville City Museum and Gallery; and
 - d. A revised Traffic Impact Assessment.
- (f) That Council resolve to prepare an amendment to the Hurstville DCP No. 2 (which applies to land within the Hurstville City Centre) and exhibit the amendment along with the Planning Proposal in accordance with the provisions of the Environmental Planning and Assessment Act 1979 and its Regulation.
- (g) That prior to the exhibition of the amendment to the Hurstville DCP No. 2 the DCP

prepared by the Proponent be amended by the Proponent to address the recommendations in this report and the recommendations of the Council Report dated 25 May 2020.

EXECUTIVE SUMMARY

- 1. This report provides an assessment of an amended Planning Proposal request (for PP 2016/0002) submitted by Georges River Council in June 2021 for the changes to the Hurstville Local Environmental Plan (HLEP) 2012 for Council owned land bound by Queens Road, Dora Street, MacMahon Street and Park Road, Hurstville (subject site known as the Hurstville Civic Precinct). A copy of the amended request is contained in Attachment 1 to this report.
- 2. In summary, the amended Planning Proposal seeks to amend the Hurstville Local Environmental Plan 2012 to address the 'Deferred Matter' status of the site and to achieve the necessary land classification, land use zoning, building height and floor space ratio to enable the future redevelopment of the existing Hurstville Civic Precinct in a manner that is commensurate with the amended Civic Precinct Masterplan Concept Design Report dated 25 May 2021 prepared for the site. Refer to Attachment 3 for the amended concept design.
- 3. The Planning Proposal as amended remains consistent with the stated *Objectives and Intended Outcomes* as detailed within the previous Planning Proposal considered and endorsed by Council on 25 May 2020 (refer to Item CCL029-20).
- 4. The proposed amendments relate to attaining an improved solar access outcome to properties to the south of the site in Dora Street. This has been achieved through the redistribution of building height at the southern end of the site. That is, the previous 48m building height control across the southern end of the site has been reconfigured to a 20m 30m and 60m control along the southern end of the site.
- 5. When developed in accordance with the revised proposed building heights, the site will facilitate significantly greater solar access to residential apartments in the mixed use building at 9 Dora Street when compared to the current proposed 48m control.
- 6. It is recommended that the Council support the amended Planning Proposal and forward it to the delegate of the Minister for Planning and Public Spaces requesting a Gateway Determination under Section 3.34 of the *Environmental Planning and Assessment Act* 1979.
- 7. This report also seeks Council's endorsement for the exhibition of the Planning Proposal and the accompanying DCP Amendment.
- 8. Prior to the exhibition of the DCP Amendment the Proponent will be required to update its Site Specific DCP to address the recommendations in this report and the recommendations of the Council Report dated 25 May 2020.
- 9. Given Council is the owner of the site, Council engaged an independent town planning consultant (SJB Planning) to undertake the assessment of the Planning Proposal.

BACKGROUND

10. The Planning Proposal was previously reported to Council on 25 May 2020. Council resolved at that meeting to endorse the Planning Proposal subject to the recommendations of the Council Report (refer to Item CCL029-20 of the Council Business paper dated 25 May 2020) requiring amendments to the Planning Proposal prior to it being forwarded for a Gateway Determination.

- 11. Those amendments were undertaken and the Planning Proposal was forwarded to the Department of Planning, Industry and Environment ('DPIE') with a request for a Gateway Determination in August 2020.
- 12. In assessing the Planning Proposal, the DPIE sought clarification and additional information relating to the solar access impacts.
- 13. Upon receipt of further information, the DPIE indicated that Council should consider revising the Planning Proposal to improve solar access provision to neighbouring development at the southern side of Dora Street by considering options to redistribute the building height of Building D (at the southern end of the site) to the corner of Queens Road and Dora Street.
- 14. Due to the expected timeframes involved in further solar access testing and revision of the Planning Proposal, the DPIE suggested that the Council withdraw the Gateway request to enable resubmission of an amended Planning Proposal at a later date.
- 15. On 19 February 2021 Council withdrew the Gateway Request.
- 16. The proponent subsequently provided detailed solar analysis which showed the following in regard to the design of built form along the southern boundary of the site:
 - a. The mixed use building to the south of the Hurstville Civic Precinct site at 9 Dora Street currently receives solar access to 68% of apartments at the winter solstice between the hours of 9am and 3pm.
 - b. This would reduce to 3% under the heights in the endorsed Planning Proposal (i.e. whereby the building height is a maximum height of 48 metres at the south western portion of the site).
 - c. The DPIE's suggested relocation of building height to a single tower with podium in the south west corner would result in solar access to approximately 20% of apartments at 9 Dora Street at the winter solstice between the hours of 9am and 3pm.
 - d. A two tower option (over a lower level podium) prepared as an alternative, where by thinner towers are positioned in the south east corner and south west corner of the site, would result in solar access to approximately 50% of apartments at 9 Dora Street at the winter solstice between the hours of 9am and 3pm.
- 17. In regard to solar access to the new Civic Plaza, it is noted that the solar access analysis demonstrates that the reconfigured building heights will affect sunlight to the Plaza. However, the solar analysis presented indicates that the Plaza will be able to achieve solar access to a minimum 50% of the Plaza area on average between 11am and 2pm on the winter solstice.
- 18. Whilst this varies from the previous draft requirement of a minimum 50% for 2 hours between 12 noon and 2pm, it is nonetheless considered acceptable and appropriate as it will result in the Civic Plaza having sunlight for a longer period in the middle of the day at the winter solstice, when people (i.e. office workers and visitors) are more likely to use the Plaza and benefit from the sunlight.
- 19. As an outcome of the solar analysis the applicant was requested to formally amend the Planning Proposal to ensure a greater level of solar access provision to neighbouring development of the southern side at Dora Street.

THE AMENDED PLANNING PROPOSAL

20. The proponent submitted the final amended Planning Proposal package in June 2021. The key amendments proposed to the Planning Proposal are:

- Adoption of the 'two tower' approach requiring a change to the height of buildings at the south western end of the site as demonstrated in the Maps below in Figures 1 and 2; and
- A change in the wording of proposed Clause 6.10 of HLEP 2012 subsections (c) and (d) relating to the minimum amount of sunlight to be received to the Civic Plaza and the deletion of a reference to DCP requirements for car parking.

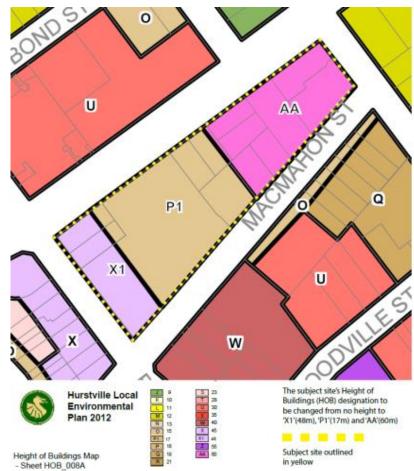


Figure 1: Maximum Height of Buildings Map as previously proposed



Figure 2: Maximum Height of Buildings Map as now proposed

- 21. The proponent has also taken the opportunity to revise the Planning Proposal in response to changes to s9.1 Ministerial Directions (relating to contamination land) and refinement of the strategic justification within the Planning Proposal having regard to the Georges River LSPS 2040. Other housekeeping revisions have been made to the Planning Proposal. These revisions to the wording of the Planning Proposal have not resulted in any further proposed amendments to the HLEP 2012 itself.
- 22. The amended Planning Proposal (in **Attachment 1**) is supported with an updated Concept Design Report (in **Attachment 3**) and an updated draft site-specific Development Control Plan (in **Attachment 2**).
- 23. The updated Concept Design Report includes further detailed analysis of the built forms along the south western edge of the site and describes in detail the solar access impacts for adjacent properties including but not limited to 9 Dora Street.
- 24. Council is advised that the DCP lodged by the proponent (and dated 25 May 2021) will need to be updated in light of both the recommendations of the Council Report dated 25 May 2020 and this report prior to it being placed on exhibition.
- 25. The applicant's response is considered appropriate and the proposed amendments to the Planning Proposal and the accompanying DCP have been included as recommendations within this report. A detailed discussion of the solar impacts is covered in **Paragraphs 31** to 52 of this report.
- 26. The Planning Proposal remains consistent with the proposal as endorsed by Council on 25 May 2020 other than for a change in proposed building heights to the south western end of the site and amendments to proposed Clause 6.10 subsections (c) and (d).
- 27. The proposed revision to proposed Clause 6.10 is shown below, with the changes identified in red.

6.10 Hurstville Civic Precinct

- (1) The objective of this clause is to facilitate the provision of community facilities and public benefits on the Hurstville Civic Precinct site.
- (2) This clause applies to land bounded by Queens Road, Park Road, MacMahon Street and Dora Street.
- (3) Development consent must not be granted on land to which this clause applies unless the consent authority is satisfied that the development will include:
 - (a) Residential land uses to a maximum of 55% of the total permissible GFA;
 - (b) Community uses and facilities to a minimum of 25% of the total permissible GFA; and
 - (c) Public open space at ground level to a minimum of 50% of the total site area, inclusive of a civic plaza that receives a minimum an average of 50% direct sunlight between 12 11 noon am and 2pm midwinter; and
 - (d) Car parking for general public use that is additional to the requirements for all land uses.
 - (d) Car parking for all land uses in accordance with the requirements of the relevant Development Control Plan plus additional car parking for general public use.
- (4) For the purposes of this clause, community facilities for Hurstville Civic Precinct site means Council administrative and civic offices; multipurpose auditorium, library, museum, art gallery, community centre, associated uses such as cafés; a range of recreation, relaxation or study areas; and any other use that Council may consider appropriate to meet the needs of the community.
- 28. The proposed amended maps are illustrated in Figures 3, 4 and 5 below:

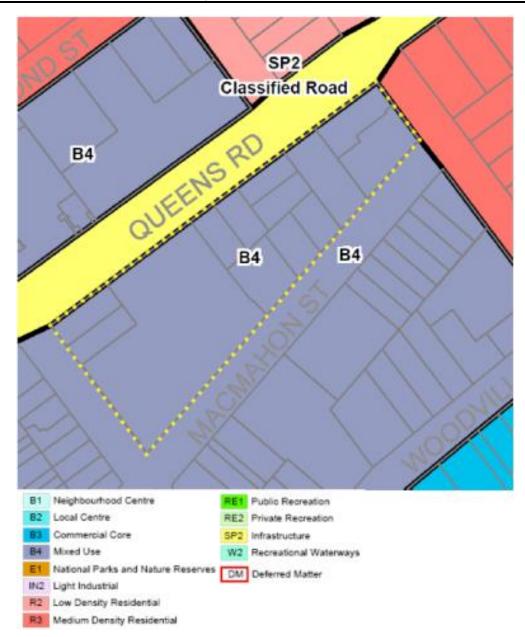


Figure 3: Extract of proposed Hurstville Local Environmental Plan 2012 Land Zoning Map - Sheet LZN_008A to remove the 'Deferred Matter' and rezone the site to B4 Mixed Use.

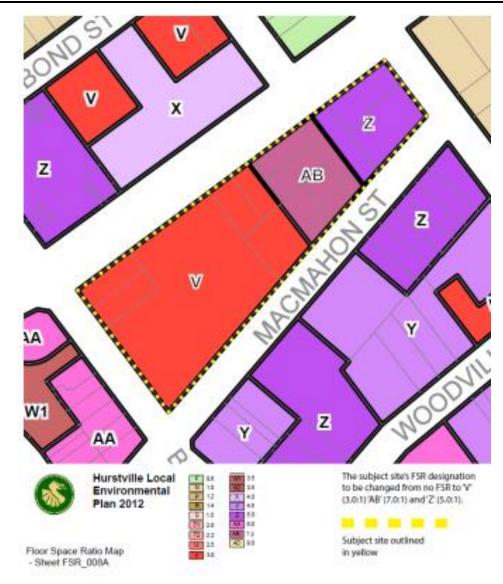


Figure 4: Extract of proposed Hurstville Local Environmental Plan 2012 Maximum Floor Space Ratio Map - Sheet FSR_008A

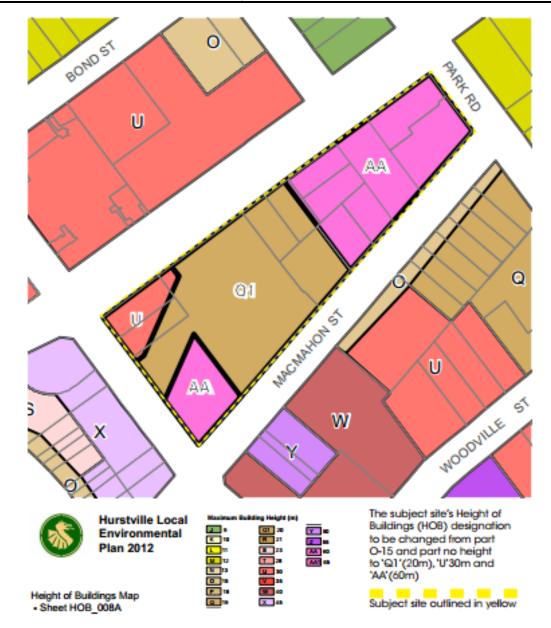


Figure 5: Extract of proposed Hurstville Local Environmental Plan 2012 Height of Buildings Map - Sheet HOB_008A

ASSESSMENT OF THE PLANNING PROPOSAL

Strategic Planning Context and Framework

- 29. The proposed revisions to the Planning Proposal effectively related to the reconfiguration of building height at the south western end of the site and do not alter the intended outcomes, the objectives or the justification for the proposal.
- 30. As such the detailed assessment undertaken in Part 5 of the Council Report dated 11 May 2020 remains valid and pertinent to the amended Planning Proposal, particularly as it relates to the proposal's consistency with the relevant and applicable strategic planning framework and statutory considerations.

Urban Design Analysis

31. The key aspects of the proposed revision to the Planning Proposal relate to the outcomes of the redistributed building height at the site upon adjacent development and the proposed public open space in the Civic Plaza.

- 32. The proponent provided detailed solar access models and drawings to demonstrate that the previously proposed 48m height control along the southern edge of the site (adjacent to Dora Street) could potentially result in a situation where the solar access to the residential apartments in the mixed use development at 9 Dora Street could be reduced to 3% from its current 68%.
- 33. Upon request to consider solutions to reduce this impact, a reduction of height through the middle of the southern boundary (i.e. a reduction from the proposed 48m height limit) and placement of height at the south west and south east corners of the site was undertaken that would allow significantly greater solar access to residential apartments at 9 Dora Street.
- 34. This approach effectively created a void in the built form through the centre of the site at the southern end as can be seen in the Sun Eye Diagram submitted with the amended Concept Design Report refer to **Figure 6**.

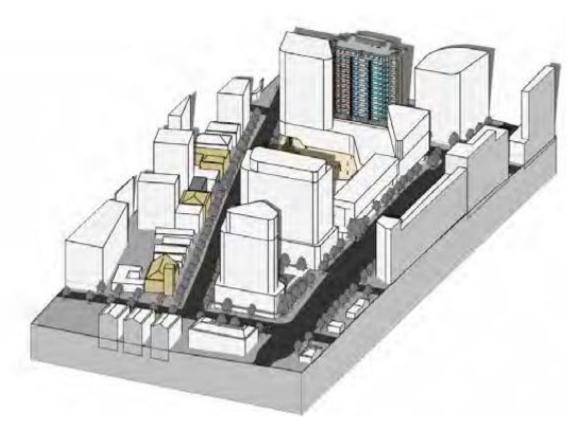


Figure 6: Extract from 10am drawing in the Sun Eye Diagrams in Section 4.9 of the Concept Design Report.

- 35. The solar analysis is outlined in the amended Planning Proposal under Section 3.3 (refer to **Attachment 1**) and in detail within the updated Concept Design Report (refer to **Attachment 3**) under section 4.9 (Controls Sun Study, Winter Solstice June 21).
- 36. The analysis demonstrates that at the winter solstice between the hours of 9am and 3pm, the building at 9 Dora Street:
 - a. currently receives solar access to 68% of apartments,
 - b. This would reduce to 3% under the endorsed Planning Proposal (i.e. whereby the building height is 48m at the south western portion of the site).
 - c. The proposed "two tower" option results in 50% of the apartments at 9 Dora Street receiving 2 hours sunlight

- 37. The two tower option effectively redistributes or breaks the existing proposed 48m building volume, which runs along the south western boundary, into three components.
- 38. The three components are a 20m podium across the south western edge with two towers above, one in each corner (i.e. Building D1 and D2).
- 39. **Figures 7 and 8** below are extracts from the amended Concept Design Report and show the proposed redistributed building height with D1 in the south eastern corner at 60m in maximum height and building D2 in the south west corner at a maximum height of 30m.



Figure 7: Extract from Section 4 "Masterplan" of the amended Hurstville Civic Masterplan Concept Design Report prepared by DWP.



Figure 8: Extract from Section 4 "Masterplan" of the amended Hurstville Civic Masterplan Concept Design Report prepared by DWP

- 40. The Concept Design Report (in Section 4.9) indicates that this scenario will not require any change to the proposed FSR controls across the site, such that the same amount of gross floor area can be captured within the reconfigured building envelopes.
- 41. The analysis also indicates that the change in height as proposed will not have a significant adverse impact upon other nearby properties in regard to solar access as summarised from the Planning Proposal and Concept Design Report and are summarised below:
 - a. 15 Dora Street New Mixed Use Shop Top Housing Building There is a minor overshadowing effect on the Dora Street façade, which by 10am is minimal and 11am has no effect.
 - b. 33 MacMahon Street Strata Commercial Building
 This building will continue to receive good solar access between 9:00am and 12:00pm at the winter solstice.
 - c. 34 MacMahon Street Council owned commercial building

This building is disadvantaged by is setback behind the building line of 9 Dora Street. However, it receives direct sun between 11:00am and 12;30pm and the small public space in front of the building receives sunlight between 11:00am and 1:30pm, noting that the new civic plaza will offset any effects of solar access to this space.

d. 350 Forest Road - Ritz Hotel Building

Reasonable solar access between 9:15 am and 10:15am. Partial solar access between 12:00noon and 1:30pm. Then reasonable solar access to the main part of the building between 1:00pm and 3:00pm.

- 42. The above analysis is demonstrated in the solar access analysis in Section 4.9 of the revised Concept Design Report.
- 43. Notwithstanding that the concept as proposed will reduce the solar access to 9 Dora Street by approximately 25% from its existing situation; the outcome represents a significant improvement to the outcome that would otherwise be achieved under the currently endorsed Planning Proposal.
- 44. Under the circumstances the outcome is considered reasonable and appropriate. The site will deliver significant public benefit and holds a strategic, central position within an existing and emerging high-rise CBD.
- 45. It is noted that reconfiguring the proposed height of buildings at the south western end of the site raised several other key issues including the retention of solar access to the proposed new Civic Plaza and the retention of a visual connection to the Civic Plaza from the main pedestrian routes towards the south (i.e. the direction of the station). These have also been addressed by the proponent within the amended Planning Proposal (refer to **Attachment 1**).
- 46. Specifically, the amended Draft DCP (**Attachment 2**) under the provisions relating to Building D sets out the requirement for:
 - "a direct visual link and pedestrian connection into the Civic Plaza from the Dora Street/ MacMahon Street/ Barratt Street intersection that is publicly accessible in perpetuity. This may occur through setting back of the lower levels of Building D from MacMahon Street to provide a generously elevated undercroft."
- 47. In regard to solar access to the new Civic Plaza, it is noted that the solar access analysis demonstrates that the reconfigured building heights will affect sunlight to the Plaza. However, the solar analysis indicates that the Plaza will be able to achieve solar access to a minimum 50% of the Plaza area on average between 11am and 2pm on the winter solstice.
- 48. Whilst this varies from the previous draft requirement of a minimum 50% for 2 hours between 12 noon and 2pm, it is nonetheless considered acceptable and appropriate as it will result in the Civic Plaza having sunlight for a longer period in the middle of the day at the winter solstice, when people (i.e. office workers and visitors) are more likely to use the Plaza and benefit from the sunlight.
- 49. The amended Planning Proposal seeks to amend the local provision relating to solar access over the plaza to allow an average of 50% direct sunlight between 11 noon am and 2pm in midwinter. This is from a minimum of 50% direct sunlight between 12 noon and 2pm in mid winter. The draft provision will now read:

Development consent must not be granted on land to which this clause applies unless the consent authority is satisfied that the development will include:

- (c) Public open space at ground level to a minimum of 50% of the total site area, inclusive of a civic plaza that receives an average of 50% direct sunlight between 11 am and 2pm midwinter;
- 50. In terms of other urban design outcomes and considerations, it is noted that the amended draft DCP submitted with the amended Planning Proposal has expanded the "Design Excellence" provisions under section 3.2 of the draft DCP.
- 51. The expanded DCP controls include a requirement for a Competitive Design Process for development within the Hurstville Civic Precinct, addressing a recommendation of the 25 May 2020 Council Report.
- 52. Combined with the proposed LEP provisions (which will ensure the community facilities are provided through a provision in Clause 6.10 which nominates specific areas for each community facility), the DCP controls will ensure a high level of design scrutiny and assessment for any future development within the Hurstville Civic Precinct.

Parking

- 53. The proposed amendments to the Planning Proposal also include a minor change to proposed Clause 6.10 subsection (d).
- 54. The change is in response to a DPIE concern which outlined that an Additional Local Provision in the LEP should not refer to a DCP provision. As such, the reference to the "requirements of the DCP" have been removed from this sub-clause, while noting that the clause still requires future development of the site to provide car parking for general public use which will be additional to the parking requirements for all land uses proposed at the site.

Endorsement of the amendment to the Hurstville Development Control Plan No. 2

- 55. An amendment to the Hurstville Development Control Plan No. 2 (which applies to land within the Hurstville City Centre) will need to be prepared and be placed on exhibition concurrently with the Planning Proposal. The DCP Amendment will be based on the Proponent's Site Specific DCP dated 25 May 2021.
- 56. However this report recommends amendments to the Site Specific DCP that has been prepared by the Proponent prior to it being placed on public exhibition as part of any successful Gateway determination.
- 57. The DCP should be amended to be consistent with the recommendations outlined in the 25 May 2020 Council Report relating to provisions for active street frontages, deep soil, sustainability targets, requirement for a Public Art Strategy and limiting trip generation through the provision of public and active transport facilities on site and enacting travel demand management measures. All of these matters have not been addressed fully within the Proponent's Site Specific DCP dated 25 May 2021.

Other matters

- 58. As previously recommended in the Council Report dated 25 May 2020, the following documents will also be required to be prepared by the proponent so that they form part of the public exhibition:
 - a. A precinct wide Public Domain Plan Strategy.
 - b. A Conservation Management Plan (CMP) prepared for the Hurstville City Museum and Gallery, including exteriors, interiors and gardens.
 - c. A revised Traffic Impact Assessment

COMMUNITY CONSULTATION

- 59. Should the amended Planning Proposal be supported it will be forwarded to the delegate of the Greater Sydney Commission requesting a Gateway Determination.
- 60. If a Gateway Determination (Approval) is issued, and subject to its conditions, it is anticipated that the Planning Proposal will be exhibited for a period of 28 days in accordance with the provisions of the Environmental Planning and Assessment Act 1979 and Regulation 2000 and any requirements of the Gateway Determination.

NEXT STEPS

61. The anticipated project timeline for completion of the Planning Proposal is shown in the **Table 1** – Next Steps below:

Task	Anticipated Timeframe
Report to Environment and Planning Committee on Planning Proposal (this report)	July 2021
Report to Council on Planning Proposal	July 2021
Forward Planning Proposal to the DPIE for Gateway Determination	July 2021
Anticipated commencement date (date of Gateway Determination)	September 2021
Timeframe for government agency consultation (pre and post exhibition as required by Gateway Determination)	October to November 2021
Commencement and completion dates for community consultation period	October to November 2021
Dates for public hearing	October to November 2021
Timeframe for consideration of submissions	January – February 2022
Report to Council on community consultation and finalisation	March 2022
Submission to the DPE to finalise the LEP	March 2022
Anticipated date for notification	May 2022

Table 1 - Next Steps

62. It is noted that the project timeline will be assessed by the DPIE and may be amended by the Gateway Determination.

FINANCIAL IMPLICATIONS

63. Within budget allocation.

RISK IMPLICATIONS

64. Operational risk/s identified and management process applied.

FILE REFERENCE

PP2016/0002

ATTACHMENTS

Attachment Amended Hurstvile Civic Precinct Planning Proposal - 210607 - published in

1 separate document

Attachment Amended Draft Site Specific Development Control Plan - 210525 - published in

2 separate document

Attachment Amended Civic Precinct Masterplan Concept Design Report - 210525 - published

3 in separate document