Amendment C231 – Queens Parade Built Form Review

267-271 Queens Parade, Fitzroy North
Expert Urban Design Evidence

Julia Bell
August 2019

Engaged by
Samcas Pty Ltd

Date of site inspection(s)
29 July 2019

DAVID LOCK ASSOCIATES
TOWN PLANNING & URBAN DESIGN

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1.0 Introduction

[1] I am an Associate Urban Designer and Planner at David Lock Associates (Australia) Pty Ltd, a town planning and urban design consultancy. I hold qualifications in urban design and planning. I have over 11 years professional experience in planning and urban design. Further details of my qualifications and experience are outlined in Appendix A.

[2] In July 2019, I was engaged to provide an independent urban design assessment of the proposed Amendment C231 to the Yarra Planning Scheme for Queens Parade, Clifton Hill (the 'study area') in respect to land at 267-271 Queens Parade (the 'site').

[3] I have organised my assessment under the following headings:

- Section 2.0 A summary of the strategic and physical context of the site

  The following chapters assess DDO16 (exhibited and post-exhibition versions) as it relates to:

- Section 3.0 Overall building height requirements
- Section 4.0 Street wall height and upper level setback requirements
- Section 5.0 Side and rear setback requirements
- Section 6.0 Conclusion

[4] I have organised my assessment in this statement under these headings.

2.0 Context

2.1 The Site

Figure 1: Site context and zoning

[5] The site is located at 267-271 Queens Parade, Fitzroy North and is currently occupied by two single storey commercial buildings. It has a consolidated site area of 540m2 (approx.).

[6] The site is bounded by Queens Parade to the north-west, Hoddle Street to the north-east, a laneway and a single storey commercial building to the south-east (501-513 Hoddle Street) and single storey commercial building to the south-west (263-265 Queens Parade).

[7] The site forms the northern tip of an 'island' of land within the Mixed Use Zone (MUZ) surrounded by a primary road network within Road Zone Category 1 (RDZ1). The southern tip of the island is zoned Public Park and Recreation Zone (PPRZ). The site is also affected by Design and Development Overlay 20 'Queens Parade' (DDO20). No heritage overlays apply to the site or directly adjacent sites.

2.2 Strategic and physical context

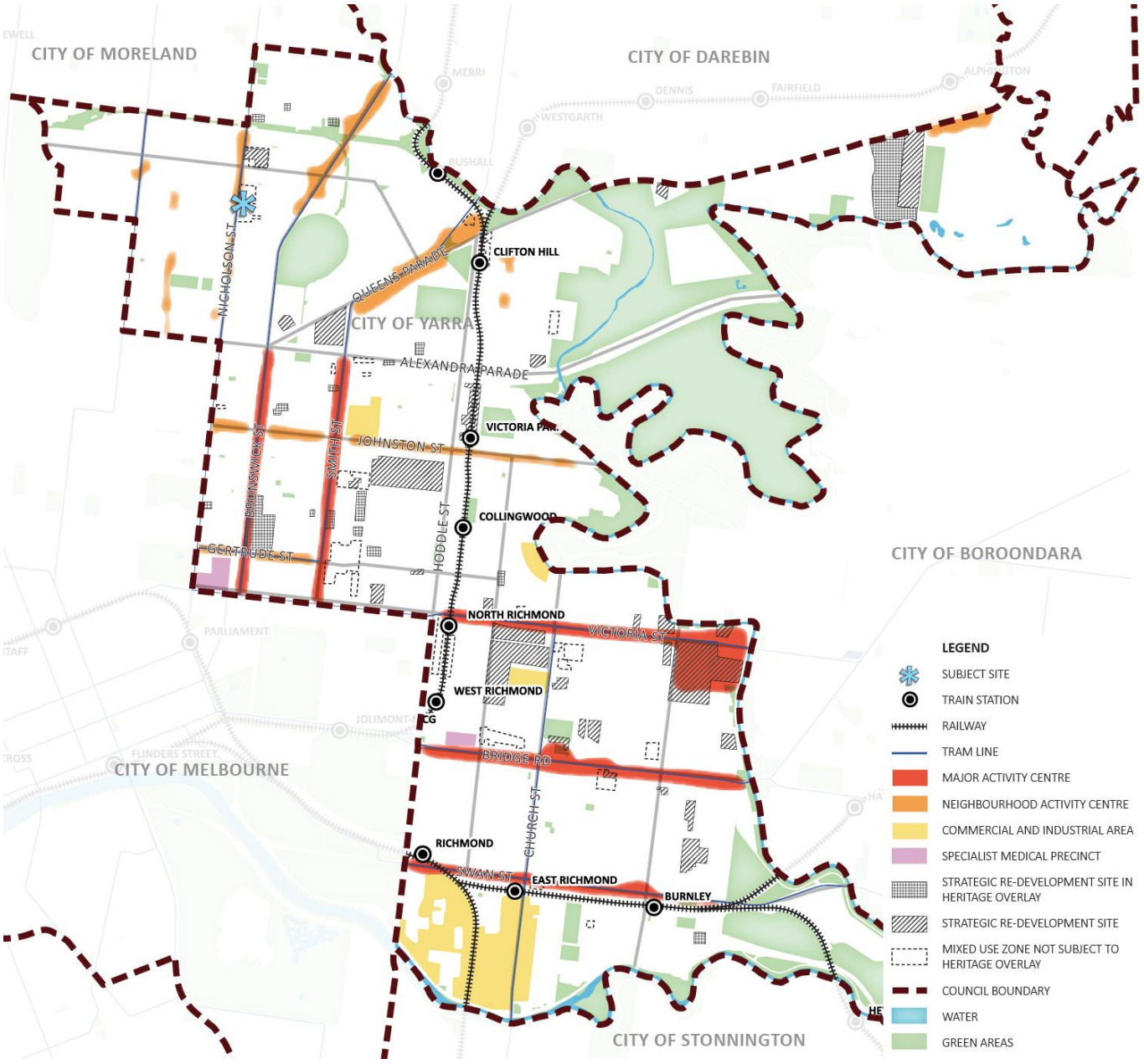

Figure 2: Strategic context

[8] The site is located within the Queens Parade Neighbourhood Activity Centre (NAC) as identified on the Strategic Framework Plan in Clause 21.03 (Vision) of the Yarra Planning Scheme.

[9] It is well serviced by public transport, services and facilities, including the route 86 tram, several bus routes and Clifton Hill train station located within approximately 200m of the site. Queens Parade includes a variety of shops and services. The site is also within proximity to various public open spaces including Mayors Park, Darling Gardens and Edinburgh Gardens.

[10] The site is located on the north-eastern corner of the Queens Parade NAC, at the junction of Queens Parade and Hoddle Street. Due to it being located at the highest point with the NAC and within an 'island' pocket edged by wide roads, it is highly exposed.

[11] The sites immediate interfaces can be generally summarised as follows:

- An 18m frontage to Queens Parade to the north-west;
- A 20m frontage to Hoddle Street to the north and east;
- An 18m frontage to a laneway (3m in width) and large undeveloped landholding at 501-513 Hoddle Street to the south-east; and
- A single storey commercial building at 249-265 Queens Parade to the south-west.

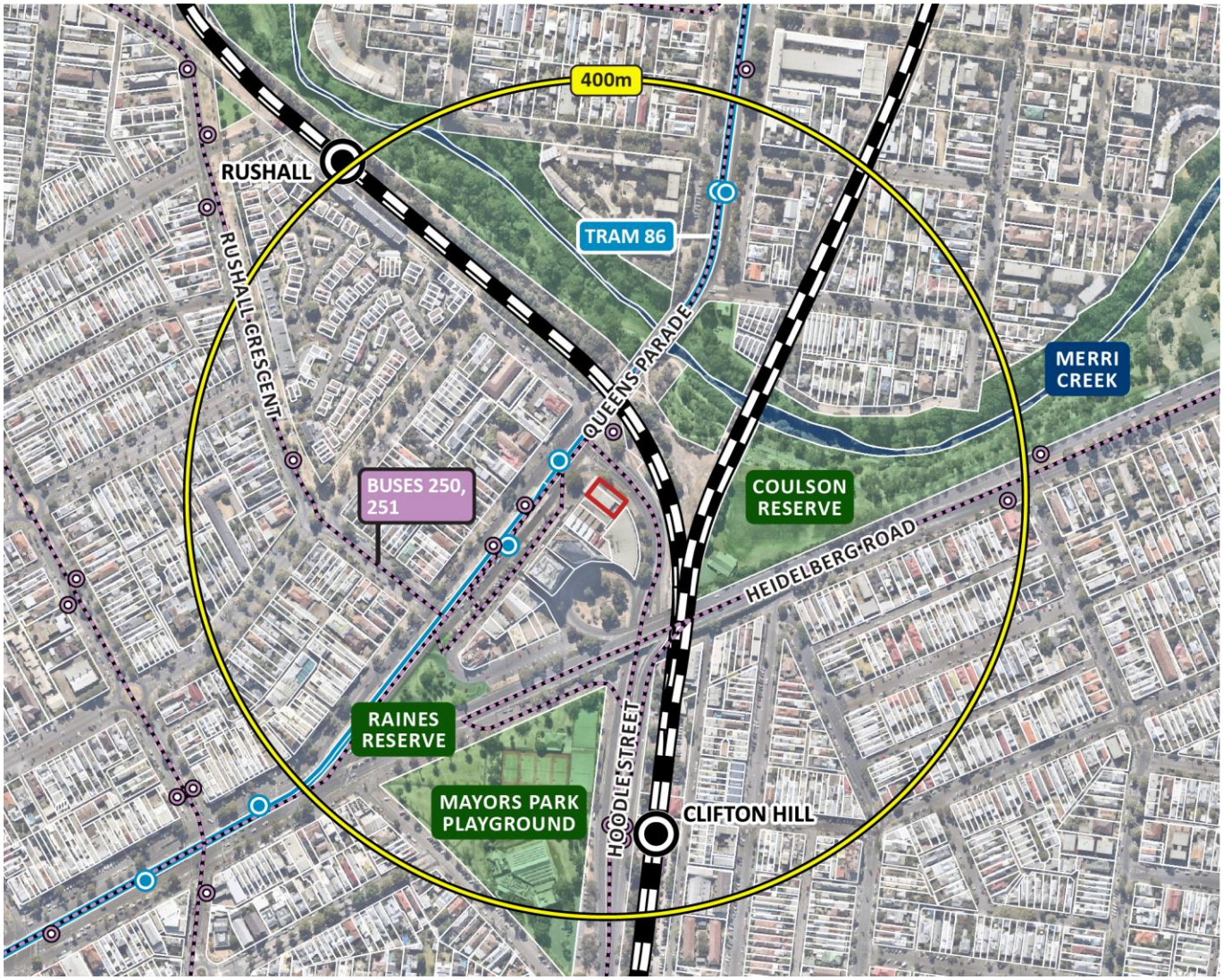

Figure 3: Site and locality

[12] The site is located within a MUZ pocket completely surrounded by non-sensitive interfaces. These include Queens Parade (60m wide approx.), Hoddle Street (30m wide approx.) and the elevated rail corridor, Heidelberg Road (36m wide approx.) and the Heidelberg Road on-ramp.

[13] The MUZ pocket also contains Raines Reserve and two individual significant heritage buildings including the former Clifton Motors building at 205-211 Queens Parade, and the former United Kingdom Hotel at 199 Queens Parade which are located approximately 100m south-west of the site.

[14] The pocket is distinct from the balance of the 'high street' character found in Queens Parade that generally contains a consistent and intact streetscape, where the heritage street wall forms the basis for the incorporation of upper level setbacks.

[15] Instead, the MUZ pocket includes larger consolidated lots and broad frontages. The lots are generally 30m in depth and some consolidations have resulted in double depth blocks with secondary rear frontages (refer Figure 4 and 5).

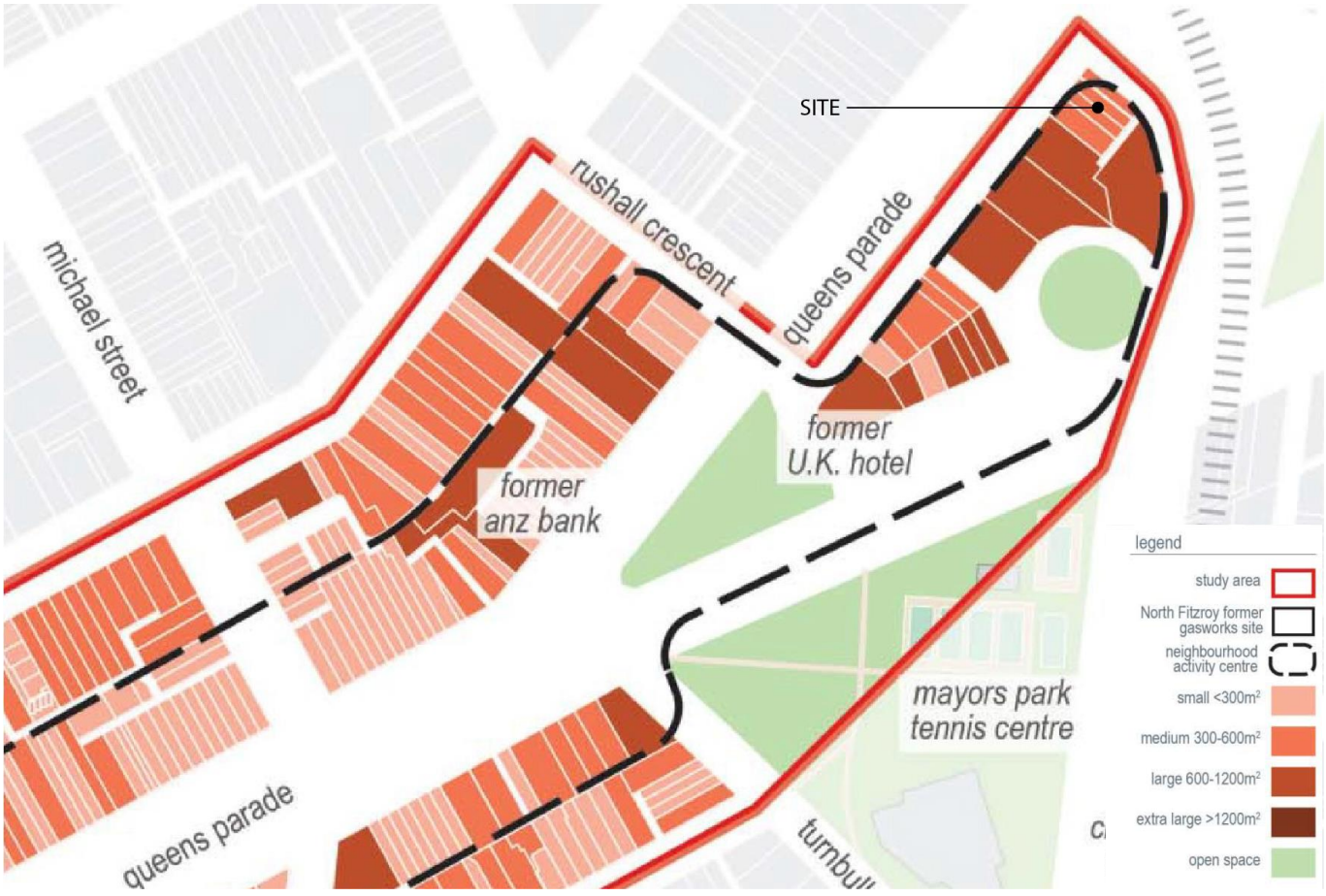

Figure 4: Lot sizes in the study area (source: Queens Parade Built Form Review, Hansen 2017)

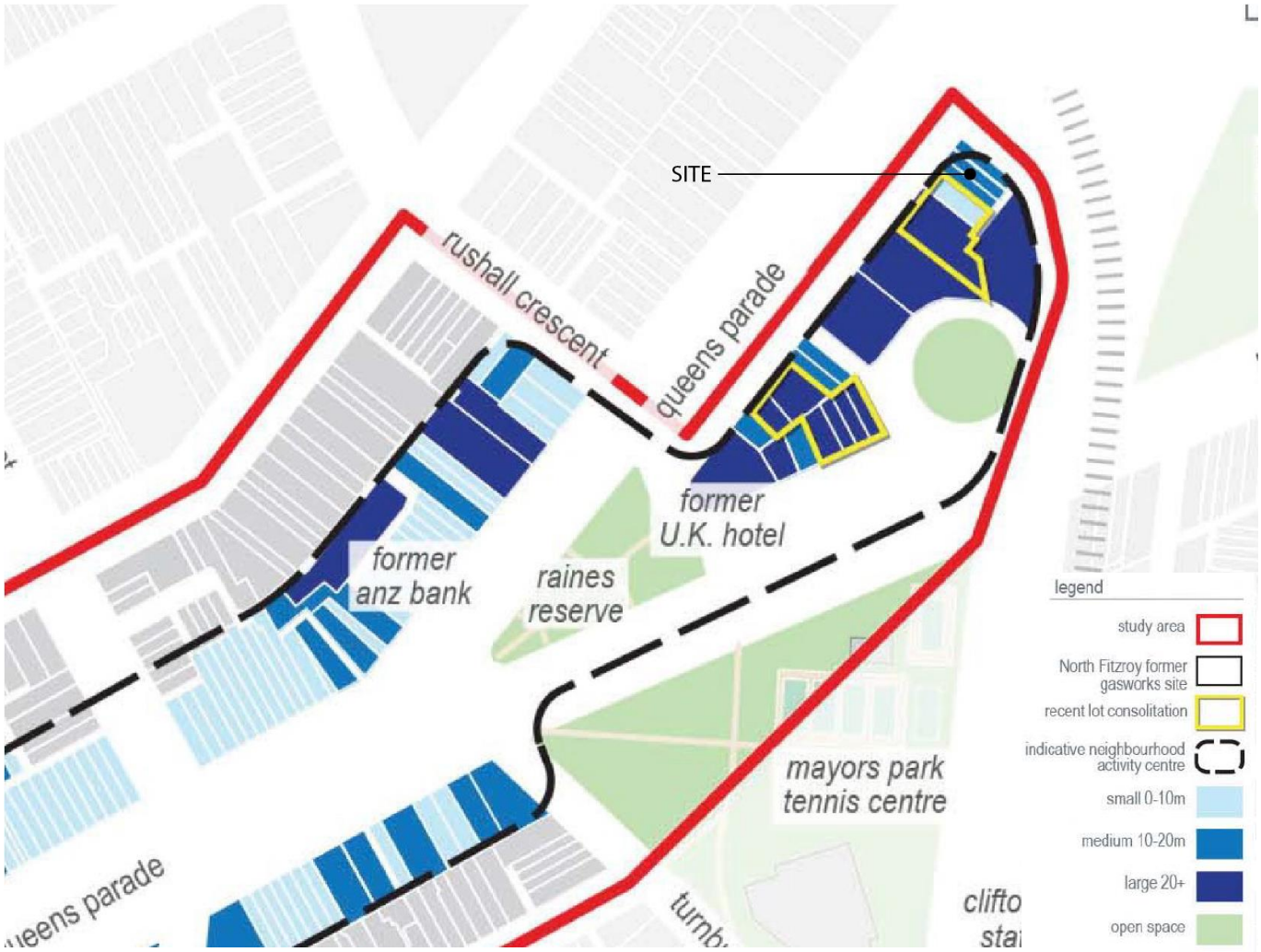

Figure 5: Lot widths in the study area (source: Queens Parade Built Form Review, Hansen 2017)

Figure 6: The site (July 2019)

Figure 7: Neighbouring land to the south west (July 2019)

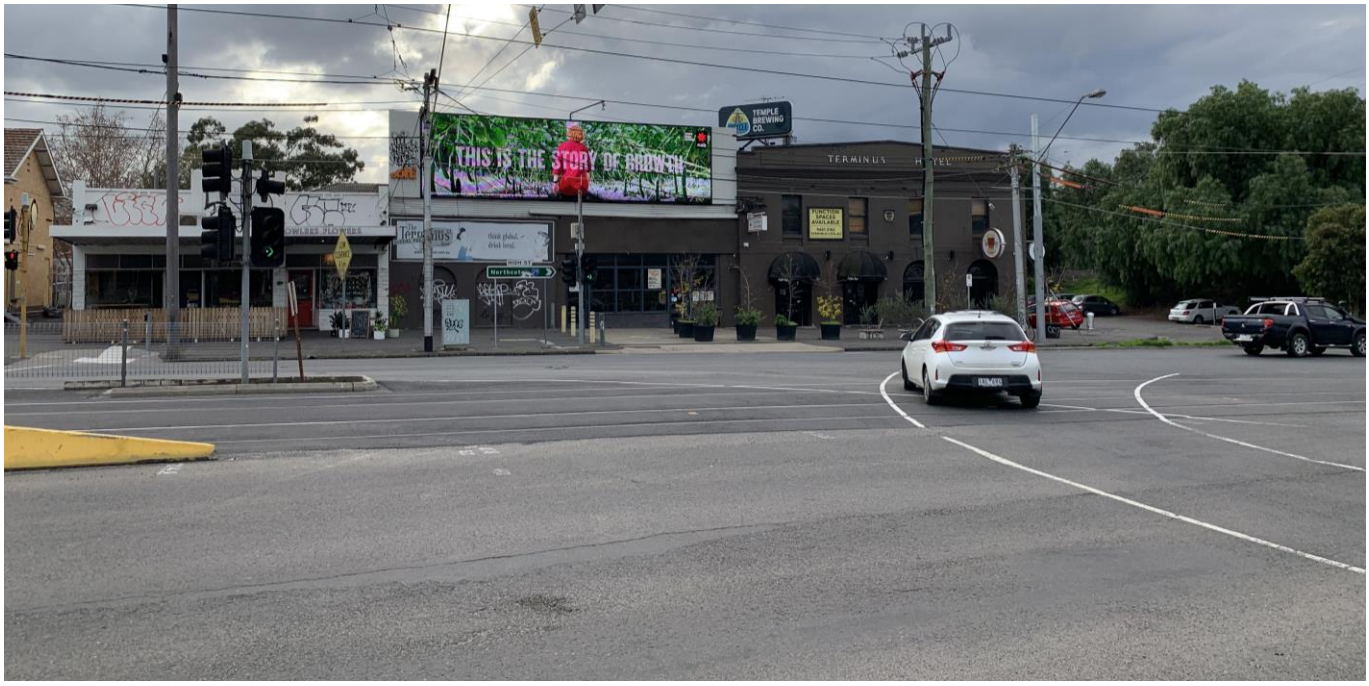

Figure 8: Built form context directly opposite the site on Queens Parade (July 2019)

Figure 9: Queens Parade context, including rail corridor overpass (July 2019)

Figure 10: Queens Parade context, looking south west (July 2019)

Figure 11: Hoddle Street context adjoining the site (July 2019)

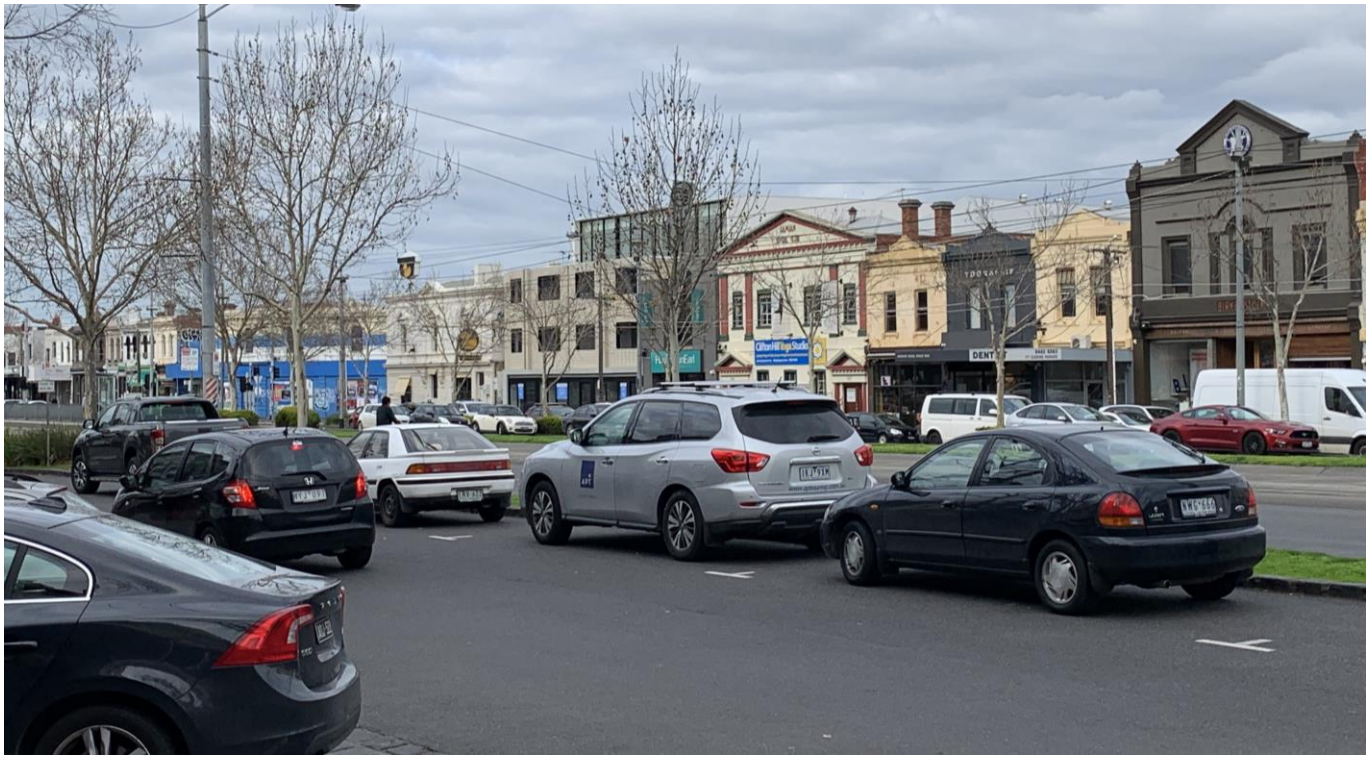

Figure 12: Other precinct area in Queens Parade with heritage context (July 2019)

[16] The distinct characteristics of this island pocket of MUZ have resulted in the emergence of newer, taller buildings including:

- 249-265 Queens Parade (adjacent to the site): 14 storeys (approved);
- 243 Queens Parade: 12 storeys (constructed); and
- 217-241 Queens Parade: 10 storeys (constructed).

Figure 13: Overall heights of proposed, newly constructed and under-construction developments in the immediate surrounding area

[17] The emerging character resulting from the recent mixed-use developments consists of a 2-storey street wall with the upper form either distinguished by materiality, setbacks or both.

Figure 14: 217-241 Queens Parade (1), 243 Queens Parade (2), 249-265 Queens Parade Queens Parade elevation (3), 249-265 Queens Parade axonometric view to Queens Parade (4).

[18] In summary, the site is located at the tip of an 'island' precinct with robust road interfaces and an emerging high-density character. It warrants intensification at a scale that responds to its location on a significant junction creating a 'bookend' to the NAC.

2.3 Policy context

[19] Under the Yarra Planning Scheme ('Planning Scheme'), the site is zoned MUZ with its primary purpose to provide a range of uses to complement the mixed-use function of the locality and higher density housing. The zone encourages new built form to respond to the preferred neighbourhood character of the area.

[20] DDO20 ('Queens Parade') applies to the site and the broader study area and contains the built form controls applicable to the site. DDO20 is an interim control and expires in January 2020. It is being updated under Amendment C231 and will be superseded by proposed DDO16.

[21] Under DDO20, the site is located within Precinct 5 – 'North Eastern Precinct' (sub-precinct 5C) which provides discretionary height, street wall and upper level setback controls for the site. A permit cannot be granted to exceed the discretionary height and setbacks, unless objectives and relevant requirements are met, to the satisfaction of the responsible authority.

[22] Under Table 5 – Precinct 5C, the site contains the following discretionary built form controls:

- 49m maximum height;
- 35m maximum front street wall height; and
- 10m minimum upper level setback.

[23] The DDO is underpinned by the Queens Parade, Clifton Hill Built Form Review 2017 (the Built Form Review). It does not currently form a reference document to the planning scheme.

[24] The Built Form Review identifies Precinct 5C as a junction that can accommodate taller forms on large unencumbered sites, that transitions down from the north-east to heritage buildings in the south-west. DDO20 is generally consistent with the Built Form Review, except for side and rear boundary setback elements that were not translated into the interim DDO20 (refer below).

Built Form Guidelines- Precinct 5C (Refer to Precinct Framework Plan on page 58)

5C

Built Form Elements	Requirements	Objectives
Building height	• 49.5m (14 storeys)	• To realise tower redevelopment of the Metropolitan junction with a profile to Hoddle Street. • To establish skyline projections that complement the profile of Yarra's existing skyline and designated landmarks.
Street wall height	• 35.5m (10 storeys) along Queens Parade.	• To denibstrate a progressive shift in form that addresses the junction of Queens Parade and Hoddle Street.
Front setback	• 0m	
Upper level front setback	• 10m above street wall	
Setback(s) from side boundary	• 4.5m from centreline of laneway, or from adjoining habitable windows/ balconies.	• To ensure adequate amenity and development equity to future development.
Setback(s) from rear boundary	• 4.5m from centreline of laneway, or from adjoining habitable windows/ balconies.	

Figure 15: Excerpt from Precinct 5C built form guidelines in the Built Form Review (source: Hansen 2017)

[25] Apart from DDO20, the Planning Scheme provides high level built form guidance and no specific built form controls for Queens Parade.

[26] Policy at both State and local levels seeking urban intensification in locations which are within suitable proximity to public transport, services and facilities and in or around activity centres (Clause 11-03, Clause 16 and Clause 21.05). Other policy seeks development to be considerate of the desired future character (Clause 16 and Clause 22.10).

[27] Clause 21.03 (Vision) designates the site in a 'MUZ area not subject to the Heritage Overlay' on the Residential Development Opportunities Map.

[28] Clause 21.04 (Land Use) includes objectives that support new residential development. Strategy 1.2 seeks to direct higher density development to sites identified through any structure plans or urban design frameworks, such as Queens Parade.

[29] Clause 21.05 (Built Form), Objective 17.2 acknowledges development opportunity for sites within activity centres. Any development seeking to exceed the 5-6 storeys benchmark must demonstrate specific built form benefits (among others).

[30] Clause 21.08 (Neighbourhoods) identifies the site within the Clifton Hill NAC. It identifies 501-513 Hoddle Street (to the south of the site) as a strategic redevelopment site.

[31] Local Policy at Clause 22.10 (Built Form and Design Policy) seeks increased height if development is within an area that warrants a distinctly different new character in order to achieve planning objectives.

[32] In summary, the planning scheme, in particular DDO20, encourages significant intensification on the site.

3.0 Overall building height requirements

[33] This section provides an assessment of the building height requirements outlined within DDO16 (both exhibited and post exhibition versions) as they relate to the site and recommends any changes or additions where necessary.

3.1 Exhibited DDO16

[34] The exhibited DDO16 includes the following design objectives that are relevant to overall height:

- *To recognise and respond to the distinct character, heritage streetscape and varying development opportunities defined by the five precincts along Queens Parade.*
- *To support a new mid-rise character behind a consistent street wall in precincts 2-5.*
- *To ensure new development responds to the grand, tree-lined boulevard character of Queens Parade.*

[35] Precinct 5 design requirements relating to height include the following:

Development must:

- *Be designed above street wall in Precincts 5B and 5C as a series of separate development parts with building separation.*
- *Establish a transition and gradual stepping down of building heights from taller forms in Precinct 5C to existing heritage form in Precinct 5A.*

[36] Table 5 prescribes a 49m preferred building height requirement.

3.2 Post-exhibition DDO16

[37] The post-exhibition DDO16 revises the exhibited height related design objectives as follows:

To support:

- *higher rise development in precinct 5, west of Dummett Crescent*

while ensuring development responds appropriately to heritage character, heritage streetscapes, sensitive interfaces and varying development opportunities.

- *To ensure new development respects the wide, open boulevard character of Queens Parade where historic trees remain the dominant visual feature.*

[38] Precinct 5 introduces a preferred character statement, which identifies the intent for Precinct 5C as follows:

- *Facilitate the renewal of Precinct 5 as a preferred location for housing growth within the activity centre.*
- *The north-eastern end of Precinct 5, south of the intersection of Queens Parade and Hoddle Street, will develop as an area of contemporary higher rise development and will bookend the mid-rise development in Precinct 2.*
- *The scale of development in Precinct 5 will step down in distinct increments from the north-east junction significant heritage buildings (the Former Clifton Motors and UK Hotel buildings) to the south-west.*

[39] Design requirements in relation to building height include the following:

Development must:

- *establish a transition and gradual stepping down of building heights from taller forms in Precinct 5C to existing heritage form in Precinct 5A.*

In Precinct 5C, development must:

- *reinforce the scale of existing high-rise buildings in the precinct (of 10-14 storeys), avoiding taller buildings which detract from this scale.*
- *ensure high quality development that enhances the prominent corner of Queens Parade and Hoddle Street through creating a strong address to each street frontage.*
- *ensure that the height and design of the street wall creates and reinforces a 'human scale' to provide visual interest at street level along Queens Parade and Hoddle Street.*

[40] Table 5 prescribes a 43m preferred building height requirement.

3.2.1 Assessment

[41] In relation to the design objectives, I support the revisions made to the post-exhibition DDO16. They clearly distinguish the different height and density intent for each precinct and in particular Precinct 5 west of Dummett Crescent.

[42] The exhibited DDO16 proposes an overall preferred height limit of 49m, which was based on rigorous analysis undertaken in the Queens Parade Built Form Review. Key objectives within the Built Form Review are *'to realise tower redevelopment of the Metropolitan junction with a profile to Hoddle Street'* and *'to establish skyline projections that complement the profile of Yarra's existing skyline and designated landmarks.'*

[43] Both the exhibited and post-exhibition DDOs states that Precinct 5C will *'establish a transition and gradual stepping down of building heights from taller forms in Precinct 5C to existing heritage form in Precinct 5A'.*

[44] Based on this, I assess there to be a clear intent for a transition in height from the tallest built form in Precinct 5C to the lowest built form in Precinct 5A. I also find there to be a clear intent for height transition within the sub-precincts, with a tower development to be realised at the Metropolitan Junction (the site), with skyline projections also supported.

[45] The post-exhibition DDO16 proposes a preferred maximum building height of 43m. I understand the reduction in height from 49m is to reflect a recalibration in floor to floor heights from 3.5m to 3m.

[46] I do not support the reduction in maximum building height from 49m to 43m for a number of reasons. Firstly, the Built Form Review provides the rationale for the heights applied across the NAC. The heights were based on 3D massing prepared to demonstrate the future built form. The analysis clearly demonstrated that a preferred height of 49m was an appropriate height and scale for Precinct 5C. See Figure 16 below.

Figure 16: Excerpt from Appendix A showing 3D massing in Precinct 5 in the Built Form Review (source: Hansen 2017)

[47] Secondly, the site's contextual cues including its corner location, wide and robust road interfaces, distance from any sensitive residential hinterland and the adjacent approved and constructed developments, suggest the site should form the tallest point in Precinct 5C.

[48] The site forms the edge of a junction described as serving as a junction of 'metropolitan presence' and therefore should project upwards from the existing skyline, in essence 'bookmarking' the top of the NAC. This is further supported by the gradual height increase emerging on the sites directly south-west as follows:

- 249-265 Queens Parade (adjacent to the site): 14 storeys (43m approx.) – approved;
- 243 Queens Parade: 12 storeys (37.2m approx..) – constructed; and
- 217-241 Queens Parade: 10 storeys (31m approx.) – constructed.

[49] The 3D massing provided below demonstrates building heights on the site that vary from 43m to greater than 49m (approx.). The images demonstrate that additional height above 43m would not be detrimental from a visibility perspective, particularly in consideration of how prominent the whole precinct is due to the width of the adjacent road reserves. The massing also demonstrates that a taller form on the site supports the emerging character of incremental height increase from the south-western end to the north-eastern end of Precinct 5.

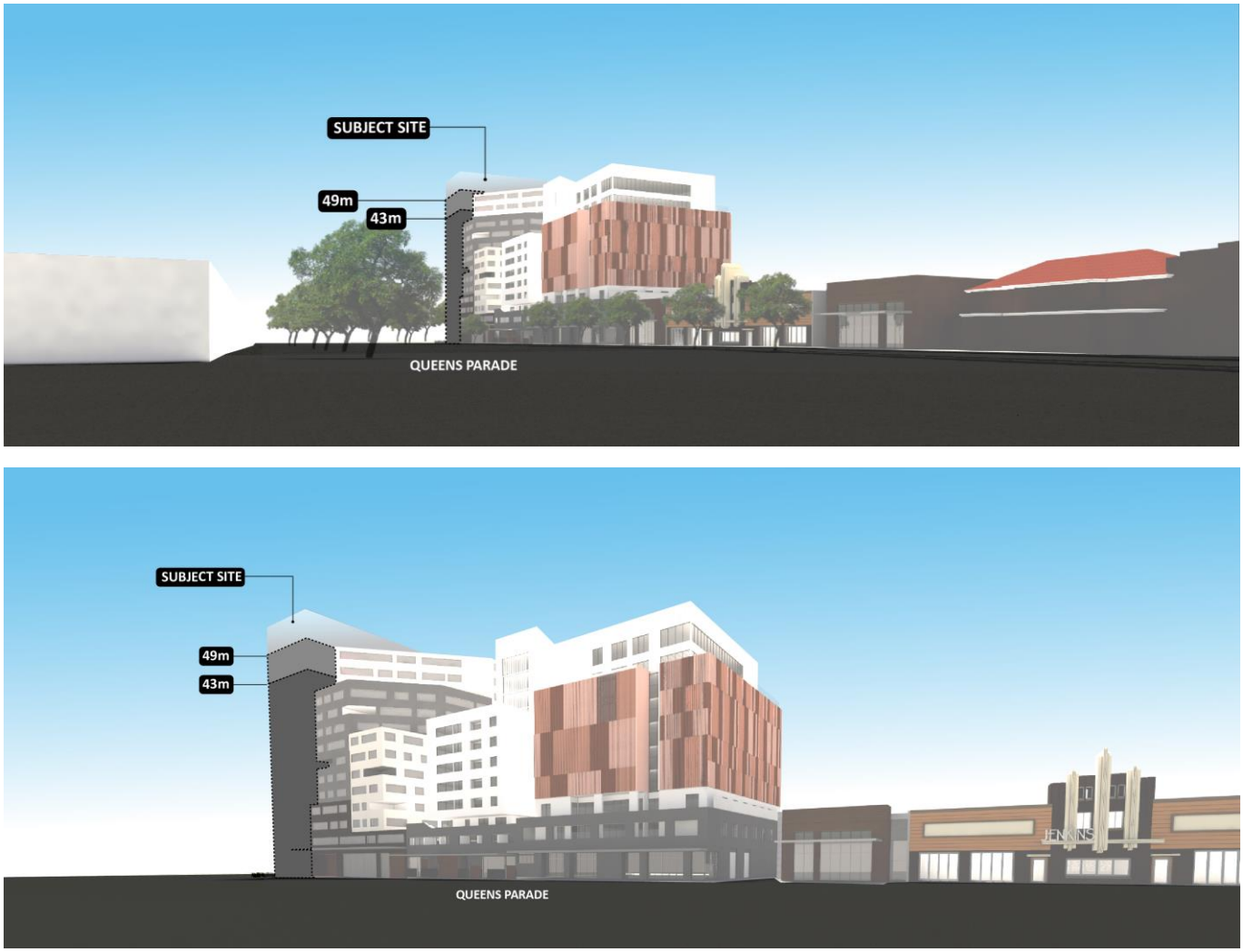

Figure 17 and 18: 3D massing (source: Petridis, with annotations)

[50] The addition of a taller form on the site creates a more varied and interesting skyline. It also signifies the edge of the precinct improving the legibility of the area.

[51] In summary, I recommend the maximum building height in Precinct 5C remains at a discretionary height of 49m, which allows the site to punctuate the junction with taller form whilst still being generally consistent with the overall emerging high-density character of the precinct. This outcome continues to be supportive of the design objectives articulated in DDO16.

4.0 Street wall height and upper level setback requirements

[52] This section provides an assessment of the street wall and upper level setback requirements outlined within DDO16 (both exhibited and post exhibition versions) as they relate to the site and recommends any changes or additions where necessary.

4.1 Exhibited DDO16

[53] Table 5 of the exhibited DDO16 prescribes a 35m preferred front street wall height with the main intent to create a consistent street wall height along the streetscape. I note the recent development at 217-241 Queens Parade has an overall building height of 35m.

[54] The exhibited DDO also proposes a preferred upper level setback of 10m. The intent of the upper level setback is to ensure that upper level additions seen from the public realm are high quality and do not diminish the appreciation of the heritage building and streetscape.

4.2 Post-exhibition DDO16

[55] The post-exhibition DDO includes additional design requirements in relation to Precinct 5C as follows:

- *Ensure high quality development that enhances the prominent corner of Queens Parade and Hoddle Street through creating a strong address to each street frontage.*
- *Ensure that the height and design of the street wall creates and reinforces a 'human scale' to provide visual interest at street level along Queens Parade and Hoddle Street.*

[56] Table 5 prescribes a preferred maximum street wall height of 18m and a minimum upper level setback of 6m.

4.3 Assessment

[57] The recent developments (approved and constructed) within Precinct 5C present neither a 35m nor an 18m street wall. The typical response appears to be a two-storey street wall distinguished from the upper form through a change in materiality, a void level or an upper level setback. The street wall heights constructed at 217-241 Queens Parade and 243 Queens Parade are two storeys and respond to the height of the heritage façade of Former Clifton Motors building to the south-west.

[58] To appropriately respond to both the existing and emerging character, I consider a more responsive outcome would be a two-storey street wall that increases in height towards the corner. The street wall should be distinguished from the upper levels through materiality rather than a

setback, as the sites location on a corner supports a bold architectural statement, with massing that holds the corner, forming a 'bookend' to the precinct. A materiality change from the street wall followed by sheer upper levels is reflected in the emerging character within Precinct 5C. The application of contrasting materiality at the lower levels and upper levels will create a 'human scale' and ensure the façade is visually interesting.

[59] The post-exhibition DDO16 further supports this outcome with a design requirement for Precinct 5C that states that development must:

[60] 'ensure high quality development that enhances the prominent corner of Queens Parade and Hoddle Street through creating a strong address to each street frontage.'

[61] In summary, I recommend the street wall height requirements are revised in Table 5 in relation to Precinct 5C to a discretionary 8-9m (2 storeys) to respond to both the existing and emerging character. In relation to upper level setbacks, I recommend the requirement for a 6m upper level setback Table 5 is deleted and replaced it with the following:

0 metres subject to a change in materiality distinguishing the upper levels from the street wall.

5.0 Side and rear setback requirements

5.1 Exhibited DDO16

[62] The exhibited DDO16 includes General design requirements which require the following boundary wall height and setback requirements for development adjoining a residential zone:

Table to Clause 2.2 boundary wall height and setback requirements for development adjoining a residential zone

	boundary wall height	setback
Common boundary	5 metres	45 degrees above boundary wall height
Laneway interface	8 metres	45 degrees above boundary wall height

5.2 Post-Exhibition DDO16

[63] The post-exhibited DDO removes the above table and introduces Upper level setback requirements that apply to side walls:

Development must:

- *be designed so that side walls are articulated and read as part of the overall building design.*

[64] Precinct 5 Design requirements pertaining to side and rear setbacks include:

- ensure buildings in Precincts 5B and 5C read as a series of separate development parts with building separation above the street wall.

[65] Table 5 introduces preferred requirements for side and rear setbacks in Precinct 5C as follows:

For upper levels, where a habitable room window is proposed:

- *4.5 metres from the common boundary or from the centre line of the laneway.*

For upper levels, where a non-habitable room window or commercial window is proposed:

- *3 metres from the common boundary or from the centre line of the laneway (on a where the laneway is less than 6 metres wide).*

5.3 Assessment

[66] In relation to the exhibited DDO16, I support the removal of the Table to Clause 2.2 and the boundary wall height and setback requirement for development adjoining a residential zone. The site and adjacent properties are within a MUZ, which suggests the requirements of Clause 2.2 would apply, which is inappropriate in a high density precinct such as this with no interfaces to residential hinterland.

[67] I support the introduction of requirement regarding side walls and articulation into the post exhibition DDO. I consider side wall articulation important to ensure a building is well designed in the round and has a positive impact when viewed from the public realm.

[68] In relation to the side and rear setbacks, I support the introduction of the preferred requirement for a 4.5m setback from the upper levels where a habitable room is proposed. This will ensure the amenity and outlook of the habitable room is maintained, creating a 9m setback in total should an adjacent site develop in the future.

[69] I also support the preferred 3m setback for upper levels where a non-habitable room window or commercial window is proposed. As this will ensure an appropriate building separation is achieved and therefore a degree of openness and views to the sky.

[70] I note, the proposed non-habitable and habitable room setbacks are proposed as a preferred control, allowing for a variation subject to different contextual situations, which I support.

6.0 Conclusion

[71] In conclusion, I support the Exhibited Amendment and the preferred built form outcome for the site outlined within DDO16. However, I recommend the following changes:

- The Design Objectives are replaced with the post-exhibition DDO16 version to better articulate the built form outcomes sought in each precinct;
- The street wall height requirement is revised in Table 5 in relation to Precinct 5C is reduced to 8-9m (2 storeys) to respond to both the existing and emerging character; and
- The upper level setbacks requirement in Table 5 in relation to Precinct 5C is removed; and
- Other matters raised in this report.

[72] I understand that there is a drafting workshop in the timetable and I would be happy to review proposed the changes put forward.

Appendix A: Summary of Experience and Personal Details

Name and Address

Julia Chloe Bell
Associate Urban Designer
David Lock Associates (Australia) Pty ltd
2/166 Albert Road
SOUTH MELBOURNE VIC 3205

Qualifications

- Member of the Planning Institute of Australia, 2008
- MA Urban Design, Oxford Brookes University, UK, 2013
- Diploma Urban Design, Oxford Brookes University, UK, 2013
- Bachelor of Urban Planning and Development, University of Melbourne, 2007

Professional experience

- Associate Urban Designer and Planner, David Lock Associates (Australia), March 2015 to present
- Senior Strategic Planner, Hume City Council (Australia), 2014 to 2015
- Strategic Planner, Hume City Council (Australia), 2010 to 2014
- Development Planner, GHD (Australia), 2005 to 2010

Area of Expertise

I have over ten years' experience in private and public practice with various planning and urban design consultancies in Victoria, Queensland and Tasmania.

Expertise to prepare this report

I have been involved in the design and assessment of numerous site-specific development projects and planning scheme amendments in Victoria. These have included:

- Evidence for Amendment C120 (Banyule City Council) for the Postcode 3081 built form controls.
- Evidence for Amendment GC81 (Port Phillip City Council) Fishermans Bend Urban Renewal Precinct.
- Evidence for Amendment C205 (Hume City Council) for the implementation of the Lindum Vale PSP.

- Evidence for Amendment C178 (Moreland City Council) Gronn Place Brunswick West.
- Evidence for Amendments C207 & 208 (Hume City Council) for the implementation of the Sunbury PSPs.
- Evidence for Amendment C223 (Stonnington City Council) for the implementation of Glenferrie Road Structure Plan.
- Evidence for Amendment C194 (Whitehorse City Council) in relation to 517, 519-521 Station Street, Box Hill.
- Evidence for Amendment C123 (Port Phillip City Council) for the implementation of the residential zones.
- Evidence for Amendment C175 (Whitehorse City Council) as it related to the land at 813 Whitehorse Road, Mont Albert.
- Evidence for Amendment C161 (Darebin City Council) for Fairfield Village, Fairfield.
- Built Form Framework for Bridge Road and Victoria Street (Yarra City Council).
- Structure Plans for Hawksburn Activity Centre (Stonnington City Council) and Greensborough Activity Centre (Banyule City Council).
- Policy writing in relation to Activity Centres (Clause 21.07 – Hume Planning Scheme).
- Prepared Hume City Council's submission to the Reformed Zones.
- Representation of Council as an advocate at Planning Panels Victoria.
- Involved in the independent review of numerous inner urban development projects from an urban design perspective.

Other significant contributors

I was assisted by Jane Witham (Planner) in the preparation of this report.

Instructions which define the scope of this report

I am engaged by Samcas Pty Ltd.

	I have received verbal and written instructions from Stephan Koenig Planning Pty. Ltd and Rigby Cooke Lawyers including various documents relating to the proposal.
Facts, matters and assumptions relied upon	• Inspection of the subject site and surrounding area; and • Review of planning controls and policies affecting the area.
Documents taken into account	In forming my opinion, I have relied on: • The Yarra Planning Scheme and reference documents; • Yarra Planning Scheme Amendment C231 documentation, including: → *Queens Parade Built Form Review (Hansen Partnership 2017);* • Application plans for 267-271 Queens Parade, prepared by Petridis Architects (reference 17-143, dated 1 June 2018); • RFI plans for 267-271 Queens Parade, prepared by Petridis Architects (reference 17-143, dated 24 October 2018); • 3D modelling prepared by Petridis Architects; and • Various correspondences relating to the proposed development.
Summary of opinions	Refer to the conclusion of this statement.
Provisional Opinions	There are no provisional opinions in this report.
Questions outside my area of expertise, incomplete or inaccurate aspects of the report	This report does not address questions outside my area of expertise, and is complete and accurate to the best of my knowledge.
	I have made all the inquiries that I believe are desirable and appropriate and confirm that no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

Julia Bell

Appendix B: Expert Independence Policy

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