

Objection statement

My objection within the marina precincts is towards the increased height of the hotel complex from 9 story's to 11 story's and the increased height of the proposed apartment buildings from 4 story's to 6 story's. The proposed height increases above what was previously approved will impact all existing residents including residents of homes already living in the marina precincts, it's an unfair change of rules. Additionally residents in neighbouring areas will also be impacted. Keeping the apartment heights to 4 stories will not reduce job opportunities and it will provide a buffer for environmental and infrastructure concerns which if the increase is approve any buffer will be depreciated.

The marina project is a great initiative and is long overdue but increasing the urban density beyond what is currently approved is not what the community is looking for. Some residents have received benefits of increased property values but more importantly there will be up-scaled social problems as the developers take their profit and move on, mistakes in this planning process could be un-reversible.

My question for the approvers of this plan is who from Frasers or the NSW government will be responsible for the resultant community and social outcomes caused by the over development of Shell Cove. ?

The over development of the Shell Cove Marina project will take away from the attraction of the marina and I believe the over development will have a negative impact on overall tourism which has been previously viewed as a key benefit of the marina project.

In my opinion the recent community feedback sessions held by Frasers and supported by the consultants who were engaged to respond to community concerns was a waste of time as the presentations were

biased towards the modification proposal and as expected the reports were not balanced with the community concerns.

Regarding infrastructure, the streets throughout the marina precincts have been built for the current approved plans and any increased densification will induce additional parking and traffic problems. A drive through the precincts outside the construction hours will provide an insight into the parking problems that additional apartments will bring to the community. Already residents are parking on neighbours footpaths where people are now tapping off their footpaths in order to keep cars off their frontages.

I am also encouraging the persons responsible for the approval of this modification to visit the site. In particular to inspect the apartments that are currently under construction in Anchorage Place with emphasis on potential parking and traffic issues. If a site visit can be organised then I further urge an inspection of views from local areas, specifically from the high points of Shellharbour Rd (near Cove Boulevard) and from the Shellharbour Workers Club which will show the indicative impact to the scenic views that currently exist.

For our community there is an expectation that state and local planners will restore confidence and integrity in the planning system, we're asking for a planning process that passes the pub test, the increased heights do not pass the pub test.

Primary reasons for objection

- o It's unfair to change the planning rules after people have bought into a community, it's even more unfair for the people who will live in these apartments.
- o The expansion of the apartment buildings beyond the approved 4 levels should not be approved. Other parts of Shellharbour are being developed with apartment style buildings and this expansion will cater

for controlled population growth.

o Expansion of the hotel in precinct E beyond the approved 9 stories should not be approved, the hotel will still be a prominent landmark at 9 story's.

o This development request is not in the best interest of the Shell Cove community and ultimately only the developers will gain from this expansion.

o Despite Frasers response to previous concerns the increased population density will have an impact on existing and future youth and community services.

o Parking and road access in the marina precincts is already impacted and increasing the population density beyond what is currently approved will further exacerbate the existing parking and traffic problems.

o There will be no contractual obligation on Frasers or the local council to fund the additional police, emergency and medical services to support the population increase.

o Mobile service providers will require additional mobile towers and capacity to support capacity and service demand, history shows there will be community conflict for the provision of new cell towers.

o You only have to look at the previous generation of suburban walk-up blocks in these areas to find the examples of the over densification.

* The large multi-unit buildings in less-prestigious locations will drift inexorably into the lower reaches of the private rental market and town centres like Liverpool, Fairfield, Auburn, Bankstown and Blacktown in Sydney point the way.

Supporting media statements, please review...

Reference #1:

<http://www.abc.net.au/news/2017-08-23/high-rise-vertical-slums-entrench-disadvantage-bill-randolph/8834784>

Reference #2:

An additional article in the Illawarra Mercury reports other concerns,

I have tried to solicit a response from Shellharbour councillors but

it seems the strategy is to ignore and the problems will go away. The

link below is from the Illawarra Mercury story dated

<http://www.illawarramercury.com.au/story/5155228/government-agencies-flag-concerns-on-shell-cove-boat-harbour-changes/>

Reference #3

The density of housing in the marina precincts is already drawing

complaints from community members, with reference in local press

articles as "Lego Land".

<http://www.illawarramercury.com.au/story/4930282/residents-warn-of-shell-cove-lego-land-amid-expansion-plans/?cs=300>

The agencies represented in this article are...

 Shellharbour council's city planning manager (Geoff Hoynes)

concerning parking problems and discrepancies with council planning guidelines

 Environment Protection Agency (David Dove) with water quality and sewerage management concerns

 Roads and Maritime Services (Sharon Barbaro) criticised the modification application, saying it did not provide enough information to allow the traffic authority to assess the affects it would have.

 The NSW Heritage's Parramatta office regarding views from the Bass Point Reserve

 Hanson Construction Materials (Andrew Driver) regarding view management and in particular the height of the hotel.

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Introduction & Declared Interest

Les Brooks,



Declared interest

- Concerned about view loss , who wants to surrender an ocean view to the back view of an apartment block.
- Concerned about urban overcrowding
- Concerned about traffic impacts
- Concerned about other members of the community who are afraid or unable to speak up

Meeting discussion points

Department Environment & Planning – MP 07_0027 MOD 1_Secretary's Assessment Report Nov 2018			
Cross Reference	Document Reference	Planning & Environment	My response
#1, #4, #15	Page 1V Executive Summary ----- Section 3 Strategic Context Page 8 Point # 2 (RTS) ----- Page 15 6.1 Density Last bullet point	Increase of dwellings from 1238 – 1566 / +26% The department considers that the proposed modification is appropriate for the site and consistent with the NSW State Priorities to create housing supply and create jobs. This would be achieved by the provision of approximately 328 new dwellings and associated construction jobs. The development is well placed to accommodate additional density, given the new town centre would provide excellent access to retail and other services to meet the needs of future residents.	I would like to declare that I support the marina project, this project will transform Shellharbour, it will provide job opportunities but this is an expected outcome of the current approved project. In my opinion the expansion beyond 1238 dwellings will have a near to zero impact on retail employment because the retail and commercial space is already set and no increased floor space is proposed. The hotel, apartments and dwellings yet to be constructed will provide construction jobs opportunities. There is no firm evidence that increasing the apartments will give a proportional increase in construction jobs as the contractors will most likely use existing staff over a longer period of time using the benefits of scale to be more efficient. Albeit the marina construction jobs will be transient and not long term.
#2, #4, #15	Page 1V Executive Summary ----- Section 3 Strategic Context Page 8 Point # 2 (RTS) ----- Page 15 6.1 Density Last bullet point	<u>The department considers the proposed density is acceptable, as it would be consistent with the strategic planning objectives for the site and increase housing supply within the Shellharbour LGA. The development is well placed to accommodate additional density, given the new town centre would provide excellent access to retail and other services to meet the needs of future residents.</u>	The marina retail and commercial floor space is already set and in my opinion the impact that retail and other services will offer to the apartment community is overstated. I agree that there will be specialty retail, food and dining stores, including Woolworths and the Inn but overall the retail experience at the Marina will be in the retail shadow of Stockland's Shellharbour . It's a fact that the Stockland's Shopping Centre is a prime shopping location for most residents of Shellharbour and surrounds. The department has assessed that the proposed density increase which is 26% above the current approved density level is acceptable. Increasing the dwelling density by 26.1%, is in fact a significant increase. I can't understand how this modification will not have significant impact to traffic in the local roads and how the parking requirements will not be impacted. Let alone how increasing the apartment heights will not cause some residents to experience view loss above what was expected from the initial proposal.

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Cross Reference	Document Reference	Planning & Environment	My response
#3	Page 1V Executive Summary	2% increase in traffic generation, the proposal does not seek to change the approved amount of retail and commercial floor space.	A 2% traffic impact at afternoon peak has been assessed but what I expect from a 26% increase in dwelling density will be longer delays in peak hour at streets intersecting with Shellharbour Rd. At present turning right from Shellharbour Rd into Harbour Boulevard on average allows 2-3 cars to turn legally. Turning right from Harbour Boulevard into Addison Rd also allows time for 2-3 cars to turn. Similarly turning left from Addison Rd into Harbour Boulevard is often restricted when 2 cars in Addison Rd (Left lane) turning right are stopped at traffic lights.
#4	Section 3 Strategic Context Page 8 Point # 2 (RTS)	The department considers that the proposed modification is appropriate for the site and consistent with the NSW State Priorities to create housing supply and create jobs. This would be achieved by the provision of approximately 328 new dwellings and associated construction jobs.	Many parts of the Departments document refers to dwelling density and related issues, this was discussed at the first 2 responses. The department considers the proposal is consistent with NSW state priorities for housing and jobs.... For brevity please consider Discussion reference #1 #2
#5	Section 3 Strategic Context Page 8 Point # 4 (RTS)	The department considers that the proposed modification is appropriate for the site and consistent with the NSW future Transport strategy 2056, as it would concentrate additional density close to the proposed town centre, <u>thus reducing the need for private vehicle use by minimising walking and cycling distances.</u>	The statement by the department suggesting the need for private vehicle use will reduce by minimising walking and cycling distances in my opinion is difficult to understand. While it's true that the distances are not great it's incorrect that motor vehicle use will reduce, this is a presumption. Many people will drive 500 metres to Woolworths rather than walk. It's a fact that residents and visitors to the marina precincts will have a strong reliance on motor vehicles. In the 2016 Shell Cove census vehicle to dwelling numbers increased to 2.2 vehicles per dwelling, where 25.9% have 3 or more vehicles and the NSW average for 3 or more vehicles increased to 16.7%. In comparison, the 2011 ABS reported 2.1 vehicles per dwelling, 21.1% have 3 or more vehicles, NSW average for 3 or more vehicles is 14.6%. There are no council controls on street parking, boats, trailers, caravans and the council can't control how garage spaces are utilised. A drive through the harbour precincts on a weekend afternoon will show the dependency on street level

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Cross Reference	Document Reference	Planning & Environment	My response
			parking. Many residents resort to street parking and in some streets bi-directional traffic is not possible without special care to avoid collisions. The ratio of cars to dwellings reflects the current requirements to have timely transport to work locations and other recreational sites. Visitors to the marina have no designated parking other than Woolworths parking and Tavern parking areas. I'm concerned for how visitors to the apartments will park. The first thoughts will be as close as possible street parking, else parking at Woolworths or the Tavern parking and this may not be particularly convenient. The likely outcome will be increased pressure on street parking.
#6	Section 5.1 Page 10	210 submissions received, 8 from public authorities, 202 from general public with 192 objections (96%). The second RTS drew 5 additional submissions from public authorities and 12 submissions from general public.	There were 202 submissions from the public with 96% objections, the level of response to the Department of Planning and Environment from the general public demonstrates the community concern that the density and view loss are major concerns of the community.
#7	Section 5.2 Table-1 Page 10 / 11 Council RTS Pt #1	Sufficient on-site parking should be provided to minimise reliance on street parking, particularly as some precincts have narrower lots reducing capacity for street parking.	I would like to acknowledge the parking concerns of the council. This concern cannot be understated as Shell Cove residents are currently experiencing traffic and parking impacts.
#8	Page 11 Bullet point #1	Council also requested that conditions related to parking rates, driveway and kerb design, provisions of flexibility for road design, Crime Prevention Through Environmental Design principles (CPTED), building design and public access be incorporated into the modification. RTS Point 1 – states that CPTED and building design not be included.	Council want CPTED to be incorporated into the modification but the RTS states that CPTED and building design not be included. By not including CPTED into design indicates a lack of concern for our community and my concern is that profits over people is the riding factor in this project. As an example, the new intersection at Shellharbour Rd and Addison Ave is confusing and access to and from Addison Rd is not entirely safe, a recent social media post referred to the intersection as spaghetti junction. There is a camber on an exit from Addison Rd that in my opinion presents a road safety hazard.

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Cross Reference	Document Reference	Planning & Environment	My response
#9	Page 11 EPA Bullet point #3 EPA response	The numerical building heights identified are not supported by a definition. <u>The building heights proposed are different from SEPP65 floor to ceiling heights and the department should review the height provisions to minimise visual and amenity impacts.</u>	This reference states that the Department should review the height provisions to minimise visual and amenity impacts, this is the crux of the community concern and for this reason the apartments should not be allowed any height increase.
#10	Page 11 Council Bullet point #4	Provision of a building height in metres may impact on population numbers, traffic, parking and infrastructure provisions for additional stories.	The council expresses a concern that building height in metres may impact on population numbers and parking etc... if this is a concern of the council then the modification proposal should not be approved.
#11	Page 11 EPA Bullet point #4 EPA response	The modification should ensure there is adequate capacity in the existing sewerage system to cater for additional load and that the systems environmental performance will not be compromised.	EPA expressed a concern over sewerage capacity, a similar concern from Sydney Water #25... The capacity of the sewerage system seems to be at 1422 dwellings (tbc) with recommendations to limit dwellings to 1420. The capacity needs to cater not only for normal dwelling occupancy but allowances for tourist and visitors to the area need to be included. Dwellings today mean average people per household in Shell Cove (2016 ABS) is 3.2 people vs the national average of 2.2 persons per household. In essence neither the developer and the EPA nor the council can limit the population density of the proposed dwellings. In my opinion the increased density will present an unacceptable risk to the environment.
#12	Page 12 RMS RTS	After a review of the traffic report, RMS is satisfied that the modification will only have a minor traffic increase and not significantly impact on the State road network.	The RTS response refers to a minor impact to the state road network, this not argued however the document does not state anything about the local road network impacts which is a community concern.
#13	Page 12 Sydney Water RTS point #2, #3	The proponent will need to undertake further servicing investigations, in consultation with Sydney Water, to determine whether there is sufficient capacity in the wastewater system to accommodate the additional growth. The additional investigation is to commence soon.	Sydney Water suggest that further servicing investigations are required... this demonstrates an existing concern from Sydney Water. Given the actual population to be serviced is unknown then the dwelling density increase should not be approved.

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Cross Reference	Document Reference	Planning & Environment	My response
#14	Page 12 TfNSW	No comment from TfNSW =----- Busses??	TfNSW had no comment, there is no suggestion that bus and train services will be increased to cater for the increased population. The reliability on private transport will not reduce and as population increases then the motor vehicle ratio per dwelling will also increase placing more pressure on roads and parking.
#15	Page 15 6.1 Density Last bullet point	<u>The NSW state Priorities to increase housing supply and create jobs. This would be achieved by the provision of approx. 328 new dwellings and associated provision of construction jobs.</u>	Many parts of the Departments document refers to dwelling density and related issues, this was discussed at the first 2 responses. The department considers the proposal is consistent with NSW state priorities for housing and jobs.... For brevity please consider Discussion reference #1 #2
#16	Page 16 Density Final paragraph	The department is satisfied that the increased density is acceptable as it would be consistent with the strategic planning objectives for the site and would not result in unacceptable impacts subject to future assessment requirements and conditions.	The department is satisfied that the increased density is acceptable... In my opinion the department has not considered the full impacts and is only seeking to fit the proposal into existing guidelines which should be just guidelines allowing for changes to be considered on a site by site basis. For this site the full modification should not be approved.
#17	Sect 6.2 Page 18 Building Heights	Follows figure 9 #1 The hotel exceeds LEP by 22 metres #2 most of the 5 and 6 story apartments would exceed LEP height control by 4-7 metres	How can increase hotel 22 metres and some apartments by 4-7 metres be seen as acceptable? It seems that guidelines are applied when it suits a developer but when the community has a concern the guideline favours the developer. These heights adjustments should not be approved.
#18, #28	Page 20 5/6 Apartments Second paragraph below Figure 11 Page 20/21 3/4 story apartments Sect 7 Bullet Pt #4Evaluation	Due to the relatively flat nature of the site and surrounding area the proposed increase in height would have limited impacts on view sharing, noting that most existing views would be lost by the current approval. Where distant views over the site would be available under the approved concept plan, the change from four to 5/6 story built forms is considered to result in only marginal or minor impacts, and the overall view loss impacts are considered acceptable.	The department is satisfied that the view loss would be marginal or minor... The change from 4 to 5/6 story apartments will in fact adversely affect a higher number of dwellings across Shell Cove and Shellharbour , this is not marginal to the people who have chosen to live in this community and therefore have helped develop our community.

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Cross Reference	Document Reference	Planning & Environment	My response
#19, #29	Conclusion Page 21	The department has considered the proposed changes to building heights in detail. In the context of the entire site, the proposed changes would not be significant, and areas of increased height would generally be offset by other areas of lower heights. Key areas of increased building heights have been shown to result in no significant impacts on the character of the area and no unacceptable overshadowing or view loss impacts. The department's assessment therefore concludes the proposed building heights are acceptable.	The department has considered the proposed changes to building heights in detail. In the context of the entire site, the proposed changes would not be significant...
	Sect 7 Bullet Pt #5Evaluation		The suggestion that increased building heights have been shown to result in no significant impacts on the character of the area with no unacceptable overshadowing and view loss impacts does not reflect the opinion of the wider community who will be impacted by the increased building heights.
#20	Page 22 Town Centre Fig 12/13	5th point <u>Increase in height of residential buildings and the number of dwellings to add vitality to the town centre</u>	Vitality within the Town Centre has already been promised with the current approved proposal. In my opinion vitality within the Town centre can be achieved with existing plan.
#21	6.3 View Sharing Page 24/25 Last paragraph	While the proposal would result in some minor view impacts, the overall view loss impacts are considered to be negligible compared to the approved concept plan.	overall view loss impacts are considered to be negligible... There were lots sold by Frasers based on the approved concept plan, on this basis it seems unfair and unethical to change the rules and to steal views by adding additional levels to the apartments. In my opinion the loss of any view is most important to the people who are directly affected.
#22	Section 6.5 Page 28 Parking Bullet Point #2	Council raised concerns that on-site parking rates should not be locked in at the Concept Plan stage, but rather be a matter for future consideration as part of the assessment of future DA's.	Council raised concerns that on-site parking rates should not be locked in at the Concept Plan stage On street parking has a limited capacity and for this reason parking rates should be locked in at Concept Planning.
#23	Page 28 Parking Point #4	596 parking spaces vs 578 parking spaces	596 parking spaces vs 578 parking spaces, +18 ... This result is an additional 18 car spaces which in the overall scheme is negligible and does not translate to afternoon traffic predications or to the 26% increase in dwelling density.

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#24	Page 28 #5	The hotel building will require 209 spaces, which is less than the 265 spaces previously estimated due to the inclusion of concessions for shared use parking between serviced apartments and restaurant/function area and applying RMS rates for high density residential.	If the hotel is considered high density residential then apartments should consider a car to apartment ratio of 2.2, to be aligned with abs statistics.
#25	Section 6.5 Page 28 Water Servicing	Sydney water appear to have concerns that infrastructure is adequate to support 1422 dwellings and the departments recommendation proposed a limit of 1420 dwellings,	On this point it seems that sewerage management design is down to the wire, in my opinion there needs to be capacity to support future growth allowing for peak visitor and tourist periods for the entire marina, a similar concern from the EPA #11.
#26	Page 30 Social Infrastructure Provision	Contains reference to <u>support infrastructure is available within a 10Km catchment area...</u>	For social support infrastructure there remains a strong requirement for private transport to access catchment area facilities. In many cases walking is not optional, as timely transport to support services within 10Km is a significant issue.
#27	Page 32 Operation of the quarry Bullet Point #3	The department notes that the development closest to the quarry will be 2 story, low density dwellings with minimal overlooking opportunity into the quarry. <u>The development with the tallest heights, typically apartment and mixed use development, will generally be located centrally on the site and away from the site closest to the quarry....</u>	In my understanding Precinct B has a proposed 6 story apartment and this is much closer to the quarry than the apartments located in other precincts, this apartment block should remain as approved by the original concept plan.
#28	Sect 7 Bullet Pt #4Evaluation	#4 building heights located centrally... The department is satisfied that the view loss would be marginal or minor...	Discussion reference #18 The change from 4 to 5/6 story apartments will in fact adversely affect a higher number of dwellings across Shell Cove and Shellharbour , this is not marginal to the people who have chosen to live in this community and therefore have helped develop our community.
#29	Sect 7 Bullet Pt #5 Evaluation	#5 view loss impacts would be negligible... The department has considered the proposed changes to building heights in detail. In the context of the entire site, the proposed changes would not be significant...	Discussion reference #19 The suggestion that increased building heights have been shown to result in no significant impacts on the character of the area with no unacceptable overshadowing and view loss impacts does not reflect the opinion of the wider community who will be impacted by the increased building heights.

Summary

We moved to Shell Cove knowing there would be development at the marina, including apartments and a hotel however I'm concerned that excessive development will occur, this could be overdevelopment similar to what has happened at Wolli Creek, Rhodes, and Liverpool etc, where concerns of overcrowding and over development have attracted a new level of media interest. A similar issue made the Sunday news (Channel- 9 on 3/2/2019) where the Premier was interviewed.

In my opinion Shellharbour and Shell Cove will, over time evolve into a medium to high rise community. This is happening now with apartments being built in close proximity to the Council hub and Stockland shopping centre as well as there are apartments being built in Addison Rd and nearby streets. The growth of apartment style dwellings should be organic and not revolutionary as I believe is this proposal.

I trust that I've been able to express my concerns today and I'm hoping I've relayed the fundamental concerns of the community.

Please consider the decision carefully and I urge the IPC to reject the modification proposal to increase apartment and hotel heights.

Harbour Boulevarde (Saturday 2/2/2019 approx 4:00pm)

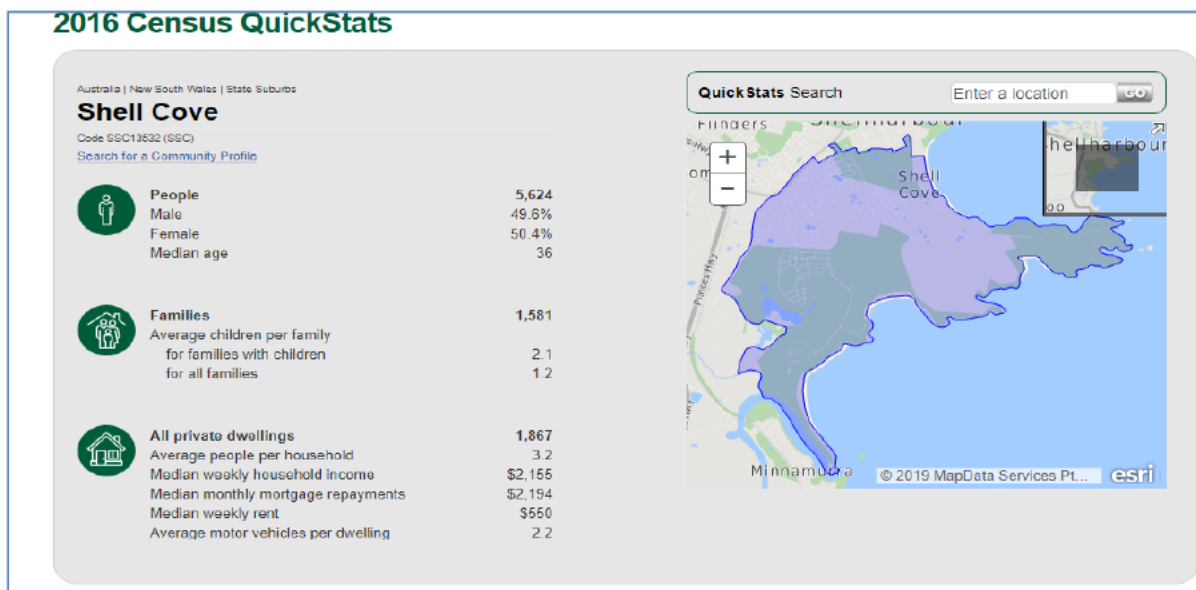
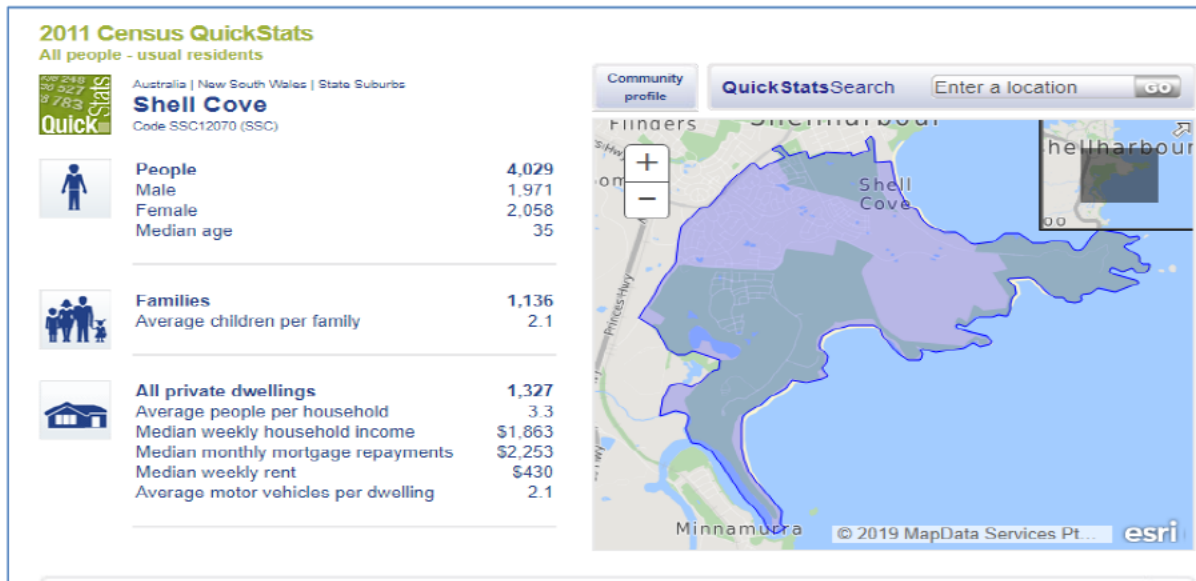
These examples of on street parking is typical of what is seen on most days.



The Farm Way (Saturday 2/2/2019 approx 4:00pm)



ABS Quick Statistics 2011 & 2016



ABS Statistics – Number of motor vehicles per dwelling

AUSTRALIAN BUREAU OF STATISTICS 2011 Census of Population and Housing

Shell Cove (SSC12070) 10.1 sq Kms

B29 NUMBER OF MOTOR VEHICLES(a) BY DWELLINGS

Count of occupied private dwellings(b)

[List of tables](#)

Find out more:

[Number of Motor Vehicles](#)

[Dwellings](#)

Dwellings

Number of motor vehicles per dwelling:

No motor vehicles	11
One motor vehicle	287
Two motor vehicles	642
Three motor vehicles	175
Four or more motor vehicles	83
<i>Total</i>	<i>1,198</i>

Number of motor vehicles not stated 15

Total 1,213

(a) Excludes motorbikes/scooters.

(b) Excludes 'Visitors only' and 'Other non-classifiable' households.

AUSTRALIAN BUREAU OF STATISTICS 2016 Census of Population and Housing

Shell Cove (SSC13532) 10.1 sq Kms

G30 NUMBER OF MOTOR VEHICLES(a) BY DWELLINGS

Count of occupied private dwellings(b)

[List of tables](#)

Find out more:

[Number of Motor Vehicles](#)

[Dwellings](#)

Dwellings

Number of motor vehicles per dwelling:

No motor vehicles	4
One motor vehicle	337
Two motor vehicles	882
Three motor vehicles	280
Four or more motor vehicles	160
<i>Total</i>	<i>1,664</i>

Number of motor vehicles not stated 29

Total 1,690

This table is based on place of enumeration.

(a) Excludes motorbikes/scooters.

(b) Excludes 'Visitors only' and 'Other non-classifiable' households.

Please note that there are small random adjustments made to all cell values to protect the confidentiality of data. These adjustments may cause the sum of rows or columns to differ by small amounts from table totals.

ABS Statistics – Number of registered motor vehicles per dwelling

ABS 2011

Number of registered motor vehicles	Shell Cove	%	New South Wales	%	Australia	%
None	12	1.0	258,153	10.4	665,852	8.6
1 motor vehicle	289	23.8	933,953	37.8	2,778,576	35.8
2 motor vehicles	643	53.0	840,655	34.0	2,802,468	36.1
3 or more vehicles	256	21.1	360,074	14.6	1,279,134	16.5
Number of motor vehicles not stated	14	1.2	78,462	3.2	234,292	3.0

In Shell Cove (State Suburbs), 23.8% of occupied private dwellings had one registered motor vehicle garaged or parked at their address, **53.0% had two registered motor vehicles and 21.1% had three or more registered motor vehicles.**

ABS 2016

Number of registered motor vehicles	Shell Cove	%	New South Wales	%	Australia	%
None	4	0.2	239,625	9.2	623,829	7.5
1 motor vehicle	337	19.9	946,159	36.3	2,881,485	34.8
2 motor vehicles	882	52.2	887,849	34.1	2,999,184	36.2
3 or more vehicles	438	25.9	435,053	16.7	1,496,382	18.1
Number of motor vehicles not stated	29	1.7	95,623	3.7	285,197	3.4

In Shell Cove (State Suburbs), 19.9% of occupied private dwellings had one registered motor vehicle garaged or parked at their address, **52.2% had two registered motor vehicles and 25.9% had three or more registered motor vehicles.**