MinterEllison

20 December 2017

BY EXPRESS POST AND EMAIL: enquiry@planningpanels.nsw.gov.au

The Chair Sydney Central City Planning Panel c/o Planning Panels Secretariat 320 Pitt Street SYDNEY NSW 2000

Dear Mr Blakely

Rezoning Review Application 16 – 26 Chapman Avenue and 17 – 27 Dawes Avenue, Castle Hill Planning Proposal to amend The Hills LEP 2012

1. Introduction

- 1.1 The purpose of this cover letter is to accompany a rezoning review application in respect of the decision of the Hills Shire Council (**Council**) on 28 November 2017 not to proceed with a planning proposal to amend the planning controls applying to land at 16-26 Chapman Avenue and 17-27 Dawes Avenue, Castle Hill (**Site**).
- 1.2 In accordance with the specifications of the Rezoning Review Application Form, this cover letter addresses a number of matters including the proponent's justification to the Strategic and Site Merit Tests to address why a review is warranted.
- 2. Requested review: the modified planning controls as recommended by the Council's Assessment Report dated 28 November 2017
- 2.1 The planning proposal, as originally submitted by the proponent in July 2017, sought to amend the zoning, floor space ratio and height of building controls under *The Hills Local Environmental Plan 2012* (**LEP**) to facilitate a mixed use development. The development was to comprise four residential flat buildings with heights ranging between eight and 19 storeys (accommodating 380 dwellings), a 100 place centre-based child care facility and a 150m café at ground level. Additionally, 2,879m² of the site was proposed to be dedicated to Council for the expansion of Chapman Avenue Reserve. The maximum floor space ratio proposed by the proponent was 3.5:1 (over the total site area).
- 2.2 For the purposes of this letter, we refer to the proposal as lodged in July 2017 as the 'Original Planning Proposal'. We have provided a copy of the Original Planning Proposal with this review application.
- 2.3 Notably, the Council's Assessment Report dated 28 November 2017 recommended for approval a modified version of the Original Planning Proposal. The report proposed an amendment to the LEP as follows:
 - (a) "Rezone the site from R2 Low Density Residential to R4 High Density Residential;
 - (b) Apply a maximum height of buildings of 47 metres on the site (15 storeys including one storey of commercial);
 - (c) Apply a base floor space ratio of 1:1 and an incentivised floor space ratio of 2.3:1 to the site:

- (d) Amend Schedule 1 to include "a restaurant or café" as an Additional Permitted Use on the site, capped at a maximum gross floor area of 150m
- (e) Identify the site as "Area A" on the Floor Space Ratio Map (to allow housing diversity local provision to apply);
- (f) Identify the site as "Area M" on the Key Sites Map (to allow bonus floor space of 20% up to a total FSR of 2.76:1 for master planned outcomes listed in Table 3 of this report to apply); and
- (g) Identify the site as "Item 13" on the Additional Permitted Uses Map."

(Modified Planning Proposal)

- 2.4 Irrespective of the merits of the Original Planning Proposal, it is the Modified Planning Proposal which is the subject of this rezoning review application.
- 2.5 The Modified Planning Proposal was refused by the Council at its meeting on 28 November 2017, for reasons discussed at part 5 of this cover letter.
- 2.6 Thereafter, on 15 December 2017, the Showground Station Precinct was gazetted by the Minister for Planning, and the Showground Station Precinct has come into force by way of the new planning controls in the LEP. The changes to the LEP apply to the precinct as a whole, and for numerous reasons do not take into account the significant site consolidation efforts carried out with respect to the Site, nor the proposed provision of public open space.
- 2.7 One important note for the Panel is as follows. As referred to above at paragraph 2.3(f), the Council's Assessment Report recommended that the LEP be amended to: "Identify the site as "Area M" on the Key Sites Map (to allow bonus floor space of 20% up to a total FSR of 2.76:1 for master planned outcomes listed in Table 3 of this report to apply)."
- 2.8 In the new LEP however, there is no "Key Sites Map" nor a bonus floor space entitlement for master planned outcomes.
- 2.9 Nevertheless, whilst the machinery is absent from the LEP, it is the proponent's view that the outcome is entirely appropriate for the site. Consistent with the controls recommended by Council's Assessment Report, the proponent requests a maximum FSR of 2.76:1 for the Site for a master planned outcome. The proponent concedes that a standalone provision in the LEP may be required to give effect to this control, but submits that the machinery is perhaps a matter that can be finalised by the Department if the matter proceeds to a Gateway determination.
- 2.10 The proponent believes that even in the context of the new provisions of the LEP, the Modified Planning Proposal has significant strategic and site specific merit, and should proceed to a Gateway determination.

3. Strategic Merit Test

- 3.1 Planning Circular PS 16-004 issued by the Department on 30 August 2016 (**Planning Circular**) provides that in cases of rezoning reviews, the relevant Planning Panel will undertake a strategic and site-specific merit assessment of rezoning review proposals.
- 3.2 The key factor in determining whether a proposal should proceed to a Gateway determination is its strategic merit. Proposals will now be assessed to determine if they are:
 - "consistent with the relevant regional plan outside of the Greater Sydney Region, the
 relevant district plan within the Greater Sydney Region, or corridor/precinct plans applying
 to the site, including any draft regional, district or corridor/precinct plans released for
 public comment; or
 - consistent with a relevant local strategy that has been endorsed by the Department; or
 - responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognized by existing planning controls."

3.3 The 'change in circumstances' is relied upon for the purposes of this rezoning review application.

Change in circumstances

The proponent has consolidated 12 lots on the Site which contain detached dwelling houses with frontages to Chapman Avenue to the north and Dawes Avenue to the south. The total site area is 11,322m². A suburban park known as Chapman Avenue Reserve (2,220m²) is adjacent to the eastern boundary of the site. The location of the Site is indicated below.



Aerial view of the site and surrounding locality

- 3.5 The site consolidation is significant, unique and perhaps unprecedented in the local government area. It has put the proponent in a position to deliver a major expansion and embellishment of the local park (a proposed 2,789m²), free of charge to the Council. There are several relevant local and State Government plans and policy documents which recognise the need for the provision of further public open space in the locality. However, these documents fail to resolve a strategy for the delivery of such open space and leave open matters including timing and/or cost.
- 3.6 The location and size of the proposed park (under the Original Planning Proposal) is depicted below.



Figure 2
Development Concept

3.7 The Council's Assessment Report agrees that there is significant public benefit associated with the provision of the public park as part of the Modified Planning Proposal. It provides:

"Strategically the planning proposal offers an opportunity to expand the Reserve further to the west by up to 2,789m providing the potential for a community hub and meeting place centred on the enlarged local park. This is an important element of this proposal as there really is very limited open space within the precinct and limited opportunity to expand what there is. Adjoining the existing Chapman Avenue Reserve, the provision of additional open space will improve liveability in this location and help acquire more land to make this space more meaningful." (Page 242)

"It is agreed that the proposed expansion and the embellishment to the existing reserve provides an opportunity to better design the open space to meet the needs of current and future residents including informal activities such as children's play, meeting friends and reading, as well as planned activities such as markets and other events. Additionally, the proposed café at ground level will be an appropriate interface with the park that provides passive surveillance to the open space while most residents are at work." (Page 250)

- 3.8 It is readily conceded that the Showground Precinct Plan also proposes an increase in the size of Chapman Avenue Reserve by rezoning other parcels of land (further to the south east of the Site) to 'RE1 Public Recreation'. Of course, this does not resolve the issue of delivery: the Council will have to acquire this land at its cost, and embellish it, so there is no guarantee of if and when the park will be delivered.
- 3.9 In addition, the proponent is not aware of any reason why a larger park than the one proposed by the LEP would not provide additional benefits: it permits a wider range of potential uses for a larger number of people, and has the potential to become a landmark recreational area in the locality. This is particularly important given Council and public concerns regarding the inadequacy of local parks in the Showground Precinct Plan.
- 3.10 Indeed, when the Modified Planning Proposal is combined with the existing park (and the new areas zoned RE1 Public Recreation in the LEP, the park has the potential to reach up to an estimated 7,229m² in site area. Although modest in size compared to parks in some other areas in metropolitan Sydney, the public benefits of an enlarged park in this precinct at no cost to Council should not be underestimated particularly when one takes into account the well-recognised absence of existing public open space in the precinct.

Controls that are less than 5 years old

- 3.11 Finally, it is noted that the Planning Circular provides that a proposal that seeks to amend controls that are less than 5 years old will only be considered where it clearly meets the Strategic Merit Test. For reasons above, it is the proponent's view that the Modified Planning Proposal clearly does so.
- 3.12 In support of this proposition, it is noted that the Council's Assessment Report has reached the same conclusion. It states:

"Having regard to the preceding sections of this report, the planning proposal has some strategic merit for residential uplift on the site, primarily due to its proximity to the future Hills Showground Railway Station and the public benefit that would be delivered, should the planning proposal for the site proceed. It does represent a significant opportunity for a master planned outcome and a significant (addition) to the local park. It represents a potentially superior outcome to just having the site developed to the base controls (page 262)."

4. Site Specific Merit Test

- 4.1 If the Planning Panel is satisfied that the Modified Planning Proposal meets the Strategic Merit Test, the Panel must then determine if the proposal has site-specific merit, having regard to:
 - "the natural environment (including known significant environmental values, resources or hazards);

- the existing uses, approved uses and likely future uses of land in the vicinity of the land subject to the proposal; and
- the services and infrastructure that are or will be available to meet the demands arising from the proposal and any proposed financial arrangements for infrastructure provision."
- 4.2 Although these matters are dealt with comprehensively in the Planning Proposal documentation provided with this application, we deal with each briefly below.

Natural environment

- 4.3 The Planning Proposal prepared by JBA dated July 2017 provides at section 2.1 2.2 that:
 - (a) the site has an area of 11,322m² and comprises 12 rectangular residential lots ranging in size from 932m² to 976m²;
 - (b) the site has a steep topography with a north easterly to south westerly fall of approximately 8m from Chapman Avenue to Dawes Avenue. The level in the east corner of the site, adjacent to Chapman Ave, is approximately RL112.16, which falls to approximately RL104.20 in the west, adjacent Dawes Ave
 - (c) several native and introduced species of trees are located in the front and rear gardens of the residential lots; and
 - (d) stormwater flow is westwards, consistent with topography, draining via the municipal stormwater system to Cattai Creek, located approximately 450m to the south-west of the site.
- 4.4 It is clear that there are no material site constraints relating to the natural environment that are of relevance to the Modified Planning Proposal.

Existing, approved and future uses of land

- 4.5 Section 2.3 of the Planning Proposal provides that the subject site is made up primarily of existing residential dwelling houses, largely one to two storeys, fronting both Dawes and Chapman Avenue.
- In relation to the future uses of the land, the Site has been rezoned 'R4 High Density Residential' under the LEP. As detailed at section 5, the planning controls have been amended significantly, to include a maximum building height of part 27m and a maximum incentivised FSR of 2.3:1.

Available services and infrastructure

- 4.7 The Site specific merit test invites a consideration of the services and infrastructure that are or will be available to meet the demands arising from the proposal, and any proposed financial arrangements for infrastructure provision.
- 4.8 According to the Council's Assessment Report, the Modified Planning Proposal would facilitate a yield of around 312 dwellings with an FSR of 2.76:1. Clearly, the additional population will place demands on existing and proposed infrastructure.
- 4.9 There are two types of 'services and infrastructure' of relevance: services and infrastructure provided by government, and those provided by the proponent.
- 4.10 Services and infrastructure provided by government:
 - (a) North West Metro: this is dealt with in detail in the Planning Proposal and at Error! Reference source not found. Error! Reference source not found. above.
 - (b) Traffic upgrades: as detailed below at part 5, a number of major improvements will be carried out as part of the delivery of the Sydney Metro Northwest by the NSW Government and the development of areas within the Precinct; Infrastructure upgrades will be provided by parties other than Council (including Transport for NSW, UrbanGrowth NSW and future individual developers within the Precincts) as development occurs, at no cost to Council In addition, infrastructure upgrades are also proposed under a draft Contributions Plan to respond to expected future demand, whilst ensuring an acceptable level of access, safety and convenience for all street and road users within the Showground Precinct

- 4.11 **Services and infrastructure provided by proponent**: The Modified Planning Proposal seeks approval for amended planning controls in response to the provision of substantial public benefit, including:
 - (a) Land dedication to Council of 2,879m of public open space
 - (b) Embellishment and extension of the existing Chapman Avenue Reserve to provide a substantial north-facing neighbourhood park with considerable opportunities for active and passive recreation:
 - (c) Delivery of two through-site links with a total area of 777m2, increasing permeability through the provision of a clearly defined east-west link.
- 4.12 **Proposed financial arrangements for infrastructure provision**: The proponent has also offered to enter into a VPA for the delivery of public domain improvements including:
 - (a) the dedication of land as an expansion of Chapman Avenue Reserve which is valued at \$13 million in a valuation report provided by the proponent (included with this application);
 - (b) the embellishment of the existing Chapman Avenue Reserve and land proposed to be dedicated is valued at \$1,880,941; and
 - (c) the design and delivery of two (2) through-site links with public right of carriageway is valued at \$485,217.
- 4.13 A copy of the Proponent's letter of offer is included in the attached bundle.
- 4.14 In light of the above, it is clear that the Modified Planning Proposal has site-specific merit.
- Relationship between the Showground Station Precinct and the Modified Planning Proposal
- As referred to above, the Showground Station Precinct has been finalised and the new planning controls are now provided for the in the LEP.
- For the purposes of the rezoning review, is necessary to briefly assess the relationship between the Modified Planning Proposal and the LEP.

Aims and objectives of the Showground Station Precinct

- 5.3 As set out at section 1.2 of the Finalisation Report, the Priority Precincts program is a NSW Government initiative which aims to:
 - (a) provide for new housing and jobs in centres with good existing or planned transport services;
 - (b) coordinate the delivery of infrastructure to support the growth; and
 - (c) make these centres attractive places to live, work and visit.
- 5.4 It is the proponent's view that the Modified Planning Proposal is entirely consistent with these objectives.
- 5.5 The Finalisation Report also provides that the vision for the Showground Station Precinct is guided by the following principles including:
 - (a) provision for a range of housing, employment and retail services close to public transport, the regional road network and high quality open spaces including the revitalised Castle Hill Showground;
 - (b) provision of high quality, pleasant network of public open space areas;
 - (c) delivery of more homes close to the station to meet growing demand and increase housing choice to reflect changing household sizes and lifestyles;
 - (d) improving access and connections to the new station and throughout the precinct through improved bus services, pedestrian and bicycle paths, and crossings over Cattai Creek;

5.6 Again, the Modified Planning Proposal is entirely consistent with these objectives: it provides for a range of housing opportunities close to the Showground Metro Station, proposes the immediate delivery of high quality open space, increases housing stock and improves access via site links.

New planning controls in the LEP

5.7 A comparison between the new planning controls in the LEP and the Modified Planning Propsal is below.

Control	Hills LEP	Modified Planning Proposal
Zoning	Part R4 High Density Residential	Part R4 High Density Residential
	Part RE1 Public Recreation	Part RE1 Public Recreation
Maximum building height	Part 27 metres	47 metres
	Part 21 Metres	
Maximum Incentivised Height of Building	N/A	47 metres
Maximum Base Floor Space Ratio	1.6:1 & 1.9:1 (10 lots 1.6:1 & 2 lots 1.9:1)	1:1
Maximum Incentivised Floor Space Ratio	2.3:1 & 2.7:1 (10 lots 2.3:1 & 2 lots 2.7:1)	2.3:1
Key Sites Bonus	N/A	20% - 2.76:1

- 5.8 By reference to clause 9.8 of the LEP which now provides that the consent authority must not grant development consent to development that results in more than 5,000 dwellings, the proponent notes:
 - (a) the Modified Planning Proposal with an FSR of 2.76:1 would permit approximately 312 units on the Site. This is a moderate numerical increase from the approximately 260 units permitted under the provisions of the new LEP with an FSR of 2.3:1. The increase of 62 units is approximately 1% of the overall cap;
 - (b) the Panel would be aware that notwithstanding new planning controls which apply to the precinct as a whole, there are numerous merit issues which will need to be resolved for each development at the development application stage (including overshadowing, privacy, built form, articulation, design excellence, view loss, heritage, streetscape, modulation of buildings etc). As a result, each site in the precinct is unlikely to reach or exceed the key development standards under the new LEP;
 - (c) it will take a some time for the cap under clause 9.8 to be exhausted. By this time, it may be that a new cap is announced (as foreshadowed by Minister Roberts, referred to at section 7).
- 5.9 Finally, there are three clear advantages to the coming into force of the new planning controls:
 - (a) firstly, the increase in yield is contextualised and can be seen as a modest increase against the existing planning controls;
 - (b) secondly, the maximum building height in the area above the station is now set at 68m stepping down to 52m. This ensures that the 47m proposed does is not overbearing or in excess of the maximum height around the station;
 - (c) thirdly, here is now more certainty on the inter-relationship between Chapman Gardens and Showground Station in relation to built form, building height and density.

5.10 For these reasons, the proponent considers that the new LEP controls support the Modified Planning Proposal rather than detract from it.

6. Reasons for refusal by the Council

- As referred to above, at its meeting of 28 November 2018, the Council resolved not to proceed with the Modified Planning Proposal for seven reasons. These reasons are addressed below.
- 1. The proposal is inconsistent with the objectives of the State Government Corridor Strategy and the exhibited Showground Priority Precinct, specifically growth projections and desired future character;
- 6.2 The proposal is neither inconsistent with the objectives of the State Government Corridor Strategy nor the exhibited Showground Priority Precinct, specifically growth projections and desired future character.
- 6.3 This is dealt with at section 3.0 of the Planning Proposal and at paragraph 5.3 above
- 2. The proposal is inconsistent with The Hills Corridor Strategy in that it would allow for a dwelling yield and built form well in excess of the envisaged outcome for the Precinct;
- The proponent accepts this is the case, but it is not relevant to the Strategic Merit Test or the Site Specific Merit Test for the purposes of this rezoning review.
- 6.5 The proponent also notes that the new LEP also prevails over the Hills Corridor Strategy.
- 6.6 Finally, the proposal is also consistent with other recent Council policy documents. According to the Council's Assessment Report:

"Strategic Plan - Hills Future

The planning proposal seeks to promote better usage of existing land and capitalise on the strategic location of the site. The proposal is consistent with the vision and objectives of The Hills Future – Community Strategic Plan as it will facilitates a desirable living environment and assists Council in meeting its growth targets. It is also consistent with the key strategy of managing new and existing development with a robust framework of policies, plans and processes that is in accordance with community needs and expectations."

- 6.7 It is considered therefore that this reason would be of no weight in the Panel's decision making process.
- 3. The proposal is likely to result in unacceptable impacts in terms of streetscape and residential amenity by way of a dominating built form, loss of privacy/overlooking and overshadowing;
- The proponent does not agree that the proposal will result in the impacts complained of and submits that these matters are all considerations to be addressed at the DA stage.
- 6.9 In relation to this matter, the proponent relies on the Council's Assessment Report which provides:

"Apart from funding the open space the increased yield also funds a better designed building. The buildings will need to be of outstanding architectural design and this proposal will need to be supported by independent design review panel advice. That advice will focus on materials and design at the interface with the public realm to ensure the materials are of outstanding quality and supported by outstanding landscaping that will contribute in a strong way to the sense of place. This will be controlled through the Local Environmental Plan, site specific Development Control Plan and the Voluntary Planning Agreement."

- 4. The proposal fails to adequately address the demand for additional local infrastructure or provide a significant community benefit to justify the increased yield on the site;
- 6.10 On the contrary, the entire basis of the proposal is to address the demand for additional local infrastructure by providing a significant community benefit to justify the increased yield on the site.

- 6.11 This is clearly supported by the findings of the Council's Assessment Report, as quoted above. Page 261 of the Assessment Report provides:
 - "However, it is noted that this location and the master planned opportunity on offer are distinct from the majority of sites within the Precinct. Very few sites can offer the proposed public domain improvements including the expansion of Chapman Avenue Reserve at minimal cost to Council. Accordingly, apart from the site to the east of Chapman Avenue Reserve there is limited opportunity for similar justification for the increase in yield currently under consideration"
- 6.12 It is considered therefore that this reason lacks merit.
- 5. The impacts on the local road network have not been adequately addressed;
- 6.13 For the purposes of a planning proposal, the impacts on the local road network have been addressed to the extent practicable. The proponent's traffic report is provided as part of this review application.
- 6.14 The Council's Assessment Report also agrees that the traffic impacts have been adequately addressed at page 259. It states:
 - (a) the traffic and transport network within and around the Showground Precinct will be subject to a number of major improvements as part of the delivery of the Sydney Metro Northwest by the NSW Government and the development of areas within the Precinct;
 - (b) Infrastructure upgrades will be provided by parties other than Council (including Transport for NSW, UrbanGrowth NSW and future individual developers within the Precincts) as development occurs, at no cost to Council;
 - (c) upgrades include new local and collector roads within the precinct, intersection upgrades and signalisation at Showground and Carrington Roads as well as Showground Road and Victoria Avenue and upgrades to the intersection of Windsor Road and Showground Road (left-turn into Showground Road);
 - (d) infrastructure upgrades are also proposed under a draft Contributions Plan to respond to expected future demand, whilst ensuring an acceptable level of access, safety and convenience for all street and road users within the Showground Precinct. The Report anticipates that the draft Contributions Plan will be reported to Council shortly in conjunction with the progression of the Showground Priority Precinct.
- 6.15 Finally, the Assessment Report refers to the Gateway Process, which allows for refinements to the proposal as necessary. In the event that the proposal proceeds to Gateway:

"it is recommended that an amended traffic assessment be submitted prior to public exhibition to assess the impact of the proposed development and surrounding development on the performance of the surrounding road network and key intersections.

This must take into account the yields proposed within the most up-to-date plan for the Hills Showground Precinct."

- 6.16 The proponent would be prepared to comply with this recommendation.
- 6. The proposal cannot provide sufficient amenity for future residents of the development by way of common open space at ground level
- 6.17 Considering the contents of this letter, it is not necessary to go into any further detail in respect of this reason. Suffice to say that if the Modified Planning Proposal does not proceed, there will be far less public open space at ground level to provide for amenity of future residents.
- 7. Permitting high density residential development on the site prior to the completion of the Hills Showground Station Precinct would be premature and could undermine the outcome of the State Government's Priority Precincts process.

- 6.18 The proponent has always been of the view that the merits of the proposal could be established, separate to and independent from the outcome of the Priority Precinct Process.
- 6.19 As the Panel would be aware, the Showground Priority Precinct has now been finalised and the changes appear in the LEP. This has one advantage: there is now far more certainty on the relationship between Chapman Gardens and surrounds in relation to built form, building height and density.
- 6.20 There is no longer any risk of the proposal undermining the precincts process.
- 6.21 In summary of the Council's reasons for refusal, the Council's opposition to the increased building heights and densities in the Showground Station Precinct is well known. It has been well reported in the media and indeed, it is set out at Part 4 of the Finalisation Report.
- 6.22 It is difficult to escape the conclusion that the Council's decision to refuse the proposal is inextricably linked with the political context in which the decision was made.
- 7. Conclusion: the provision of a generous and 'future proof' public park in this area will only be achieved if the Modified Planning Proposal proceeds
- 7.1 The concept of balanced urban growth should involve a consideration of increased development yield against the provision of public benefits and community infrastructure associated with the proposal.
- 7.2 It is the proponent's view that the Modified Planning Proposal is a good example of balanced urban growth and that it clearly satisfies the Strategic Merit Test and the Site Specific Merit Test.
- 7.3 The proponent is also of the view that the rezoning review should be properly considered in its long term context. In this regard, we refer to the media coverage of the finalisation of the Showground Station Precinct and the stated intentions of Minister Roberts to increase housing from 5,000 to 8,500 (as reported on 14 December 2017 on 2GB and the Sydney Morning Herald) in the long term.
- 7.4 It is clear that the provision of a generous public park (as proposed) will not be possible once the precinct is developed. In particular, it will not be possible or practicable to acquire land already developed for urban purposes, then demolish buildings, and retrofit the land as public open space. The cost of acquiring the land alone would be prohibitive.
- 7.5 It is the view of the proponent therefore that the Modified Planning Proposal represents a once-off opportunity to ensure the provision of public open space for new residents and their children in the Castle Hill area, regardless in the increase in dwellings over time
- 7.6 In light of the above, the Modified Planning Proposal has abundant strategic and site specific merit, and should proceed to a Gateway determination.

Yours faithfully **MinterEllison**

John Whitehouse Partner

for whomense

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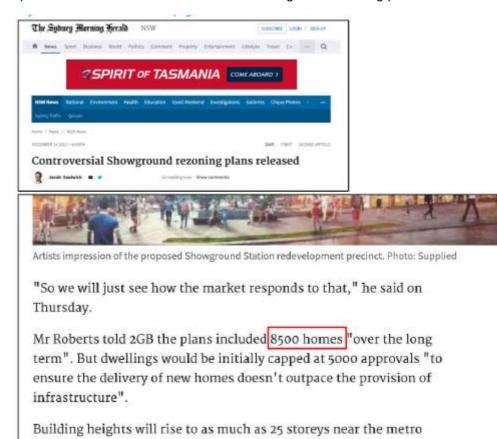
OUR REF:

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Appendix 1

http://www.smh.com.au/nsw/controversial-showground-rezoning-plans-released-20171214-h04gyd.html



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