



13223
17 May 2013

Sam Haddad
Director General
NSW Department of Planning and Infrastructure
PO Box 39
SYDNEY NSW 2001

Attention: Alan Moroney & Tricia Bancroft – Strategic Assessment

Dear Mr Haddad

**SUBMISSION - NORTH WEST RAIL LINK CORRIDOR STRATEGY
139- 145 CASTLE HILL ROAD, WEST PENNANT HILLS**

JBA Planning (JBA) has prepared this submission on behalf of various land owners in response to the NSW Government's recently exhibited *Draft North West Rail Link Corridor Strategy* (herein referred to as the **draft Strategy**) and the accompanying *Cherrybrook Station - Draft Structure Plan* (herein referred to as **Cherrybrook Structure Plan**).

These landowners include:

- IJ & CA Pignat
- R & ML Pignat
- A Balout
- M Kohlhausen
- S Sandhu
- L Stapley
- K Stapley
- R McMillian

It is requested that the matters raised in this submission be considered in finalising the Strategy and Cherrybrook Structure Plan and be used to further inform the future planning of the land surrounding the future Cherrybrook Station. We appreciate the Department of Planning & Infrastructure (**DPI**) taking time to review this submission and welcome the opportunity to meet with DPI if further clarification is required.

First and foremost, the landowners for whom this submission has been prepared, commends the State Government's initiative to undertake master planning work in support of future rezoning and infrastructure delivery around the nodes of each of the new stations for the North West Rail Link. The delivery of significant transport infrastructure in the North West Sydney region is welcome and necessary for the region's existing and future communities.

While this direction is supported we would like to draw to your attention various elements of the draft Strategy and Cherrybrook Structure Plan that we believe require amendment and refinement.

1.0 SUMMARY OF SUBMISSION

The land owners support the intent of the draft Strategy and Cherrybrook Structure Plan. However the draft Structure Plan ignores the potential for surrounding land in West Pennant Hills to accommodate any new and significant residential accommodation in the close proximity to the future station at Cherrybrook.

The land owners welcome the opportunity to assist in the Government's aims of increasing housing development in the close proximity to the Cherrybrook station by requesting that their land be rezoned to accommodate medium to high density residential development.

The key issues and recommendations raised in this submission include:

- That over half of the walkable catchment of the Cherrybrook Station identified in the structure plans fails to include **any** opportunities to contribute towards the delivery of new housing that would support the Government's objectives to provide additional high density housing with good proximity to public transport.
- Department has appeared to rely upon the Council's own policies and development regime to then recommend preclusion of any alternative forms of residential development from being developed over the sites, and any adjoining sites. These existing Council policies have been implemented and based upon the Soil Conservation Service's out-dated 1977 Urban Capability Study to the Council.
- This approach is contrary to the approach now sought and recommended by the State Government's own White Paper, which is that planning is to be an evidence based system.
- Despite their current planning approach to landslip affected land, the Council supports the potential for the development of medium density development (town house development only) over similarly affected landslip sites.
- We are of the view that all of the subject sites present ideal opportunities for additional and high density residential development on account that they are relatively underdeveloped, are large in site area and are in good proximity to the future Cherrybrook Station.

These factors and the ability to overcome geotechnical site conditions through development make the sites ideal to provide immediate opportunities for medium to high density residential development that will deliver new housing in the short term.

- The land owners support the preparation of more detailed studies to support the future rezoning of land in the Cherrybrook Station Precinct, however this should be limited to a broad ecological study, a Transport Management Access Plan (TMAP) and assessment to identify necessary local and regional infrastructure that would support the expected increases in population in the precinct.
- It is unclear what steps are to be taken herein to lead to the effective rezoning of land in the Cherrybrook Station Precinct; this needs clarification to identify opportunities for the land owners to be involved and consulted.
- We recommend that the Department consider the use of regional infrastructure contributions and increase development opportunities in the southern portion of the Cherrybrook Station Precinct to ensure that:
 - broader infrastructure outcomes such as the delivery of regional parks and facilities;
 - the provision of infrastructure is distributed equitably; and
 - all necessary local and regional infrastructure can be adequately funded.

On the basis of the above, it is requested the draft Cherrybrook Structure Plan be revised to identify capability for medium to high density residential development over the land that is referred to in Section 3.0 of this submission.

We also suggest DPI undertake a review of The Hills DCP geotechnical controls to ensure the Council's requirements do not impede medium density housing and apartment construction in the NWRL Corridor

and ensure that these controls and policies align with current best practice guidelines for landslip affected land.

2.0 CHERRYBROOK STATION STRUCTURE PLAN AND DRAFT STRATEGY

Cherrybrook is one of eight new stations proposed along NWRL and is the subject to the Cherrybrook Station Draft Structure Plan (**draft Structure Plan**). The Draft Structure Plan presents the opportunities and constraints for new development in Cherrybrook and West Pennant Hills as a result of the new rail station and within the existing physical and environmental constraints. The area subject to the draft Structure Plan is shown at **Figure 2-1**.

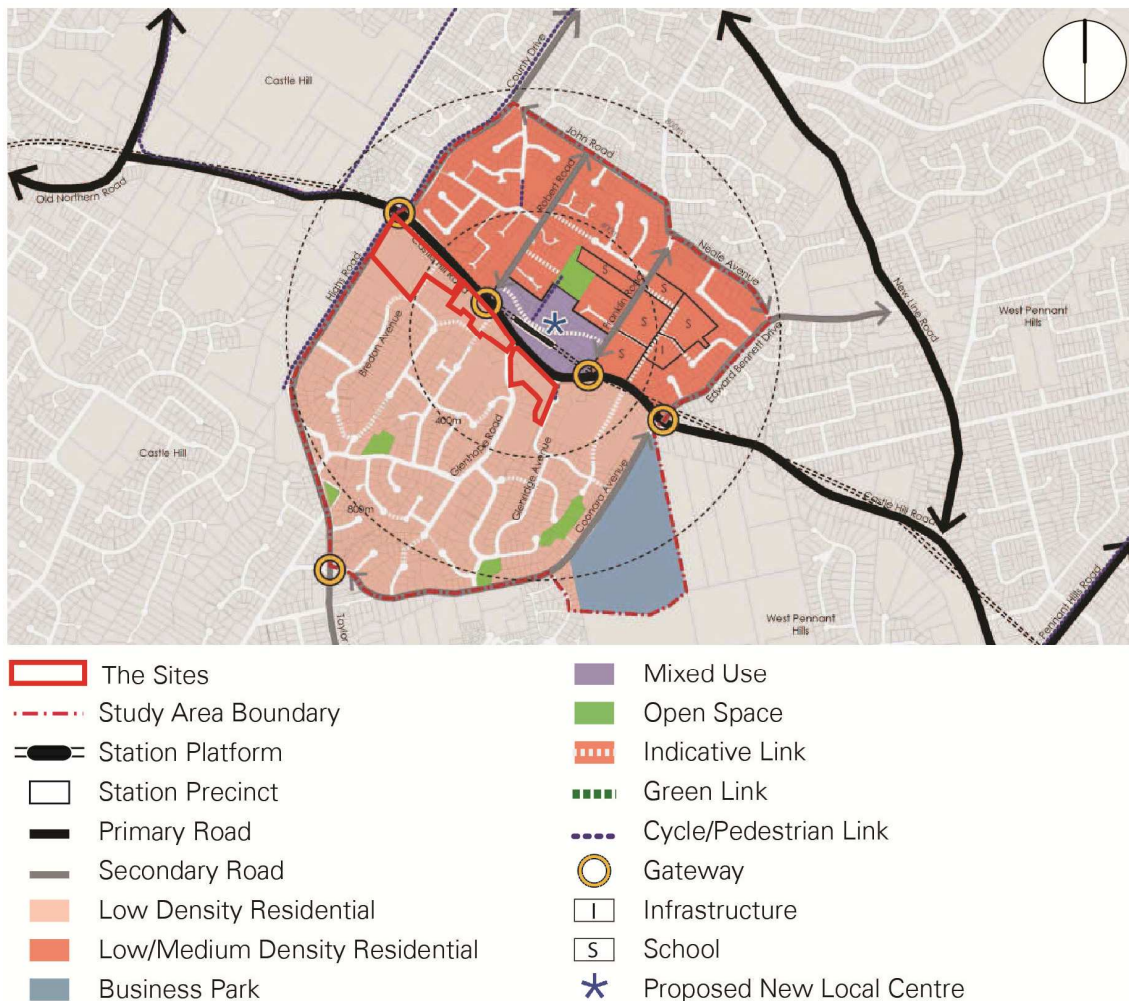


Figure 2-1 – Cherrybrook Structure Plan and the subject sites

The key objectives for the Draft Strategy and Structure Plans are to:

- guide development over the next 20-25 years in the vicinity of the eight new stations for the NWRL;
- “ensure future land use and transport networks around each station are well integrated with adjacent neighbourhoods and reflect the best practices of transit-oriented design”; and
- facilitate the delivery of transit orientated development that maximises the benefits of the State Government’s investment in major rail infrastructure by boosting employment growth by creating 25,000 additional jobs and delivering higher density residential development within the NWRL corridor.

The key conclusions and directions of the draft Cherrybrook Structure Plan are:

- Identifies all land within a walkable catchment of 800m to the new Cherrybrook Station. This is herein referred to as the “Cherrybrook Station Precinct”.
- Constraints to development include land identified to be affected by landslip and/or land that incorporates threatened species, most notably Blue Gum Forest.
- Although well within the 800m walkable catchment of the future Cherrybrook Station, all such land south of Castle Hill Road has been considered incapable of accommodating any further or significant residential development.
- The development of a new mixed use centre focused around the new station and north of Castle Hill Road.
- That the composition of housing types in the Cherrybrook Station Precinct will radically shift from predominantly single separate dwellings to apartments (approximately 50%) and that apartment development will be accommodated in land north of the Castle Hill Road.
- The implementation of two new “gateway” entry points along Castle Hill Road – although these do not appear to connect to existing or new roads south of Castle Hill Road.
- The creation of 10 open space and pedestrian/road linkages through West Pennant Hills, over existing privately owned land that will presumably assist in enabling residents in West Pennant Hills gaining more direct access to the new station.
- The Cherrybrook Station Precinct is expected to deliver 1,800 new dwellings. More specifically the following number of additional dwellings (by dwelling type) are recommended:
 - Single detached dwellings – minus 350 dwellings (ie. a decrease);
 - Townhouses – 400 new dwellings;
 - 3-6 storey apartments – 1,750 new dwellings; and
 - 7-12 storey apartments – 0 new dwellings.

The draft strategy and structure plans will inform zoning and planning control changes to then encourage the delivery of expected supply driven housing and employment targets along the NWRL corridor. However, it is understood that the draft Strategy and structure plans were prepared without the support of relevant and recent studies that would ordinarily be prepared to properly identify constraints and opportunities for additional development. Moreover, references in the structure plan indicate that further some studies will need to be carried out. However, with exception of the ecological studies, it is unclear what other specific studies these may be and when these will be prepared in relation to the timing to implement rezoning and development control amendments.

3.0 SITE ANALYSIS

The sites to which this submission relates are located to in West Pennant Hills directly south of Castle Hill Road and bounded by Highs Road to the west and include the following lots:

- 109 Castle Hill Road – Lot 1 DP 785672
- 113 (Glenhope), 115 & 115A Castle Hill Road – Lots 5,6 & 7 DP 1012463
- 117 Castle Hill Road – Lot 4 DP 1012463
- 2 Glenhope Road - Lot 1 DP 864230
- 1 Glenhope Road – Lot 12 DP 809362
- 123 Castle Hill Road – Lot Q DP 378655
- 125 Castle Hill Road – Lot P DP 378655
- 127 Castle Hill Road – Lot 1001 DP 800162

- 18A Carioca Way – Lot 12 DP 1016426
- 133 Castle Hill Road – Lot 201 DP 786607
- 137 Castle Hill Road – Lot 2 DP 220867
- 139 Castle Hill Road (Dunrath) – Lot 1 DP 220867
- 141 Castle Hill Road – Lot 1 DP 210585
- 143 Castle Hill Road – Lot A DP 153486
- 145 Castle Hill Road – Lot 111 DP 101828
- 6-8 Highs Road – Lot 10 DP 577670

Collectively these sites account for approximately 12ha, two of which are the heritage items listed under The Hills Local Environmental Plan 2012 (LEP 2012) known as “Dunrath” and the other “Glenhope”. All of the sites are located within The Hills Shire Local Government Area (see **Figure 2-1**).

This area is currently zoned E4 Environmental Living under LEP 2012. Dwellings and dual occupancies are the only forms of residential development permitted within the E4 zone and the minimum lot size for this land in zone is 2,000sqm, thereby restricting development to ‘very low residential development’.

The sites are sloping and are generally cleared with stands of trees at the corner of Highs and Castle Hills Roads. It is noted that the Cherrybrook Structure Plan identifies this and other parts of the site as accommodating an extensive area of ‘Blue Gum Forest’, which is a critically endangered community. However, this is not substantiated by any relevant and qualified studies that underpin the draft plan. Nor do any of Council’s own development control plans or policies or publicly available information indicate that the sites include Blue Gum Forest.

The suburb of West Pennant Hills is characterised by large scale houses, with street layouts that are dominated by cul-de-sacs and fragmented open spaces. The Australian Bureau of Statistics (ABS) Census data for 2011 illustrates that the composition of dwellings types in West Pennant Hills are predominantly separate dwellings (90.1%). Comparatively to the rest of NSW West Pennant Hills lacks any real dwelling variety (see **Table 1** below).

Table 1 – Dwelling composition comparison West Pennant Hills and NSW (ABS Census 2011)

Dwelling Type	West Pennant Hills	NSW
Separate Dwellings	90.1%	69.5%
Semi-detached, row and townhouses	7.8%	10.7%
Flat, unit and apartments	1.6%	18.8%

Under the Council’s current planning controls there are very few opportunities exist in West Pennant Hills to generate any additional dwellings and as such the area has realised its development potential for ‘very low residential development’. The only remaining lot larger than the 2,000sqm minimum permitted are located directly south of Castle Hill Road, including the subject sites.

Under the Cherrybrook Structure Plan the sites are identified:

- as being within 400-600m radius of the future train station for Cherrybrook;
- as containing significant stands of Blue Gum Forest;
- as being affected by landslip conditions; and
- as retaining current zoning and planning regimes that reinforce very low residential development outcomes.

3.1 Geotechnical Considerations

Under clause 7.6 of The Hills LEP 2012 the sites are all identified as 'landslip risk' (see **Figure 3-1**). The objective of this clause is to “ensure that development is commensurate to the underlying geotechnical conditions and to restrict development on unsuitable land.” Under Council’s DCP part of the site is identified as ‘restricted development’, which relates to a small riparian corridor.

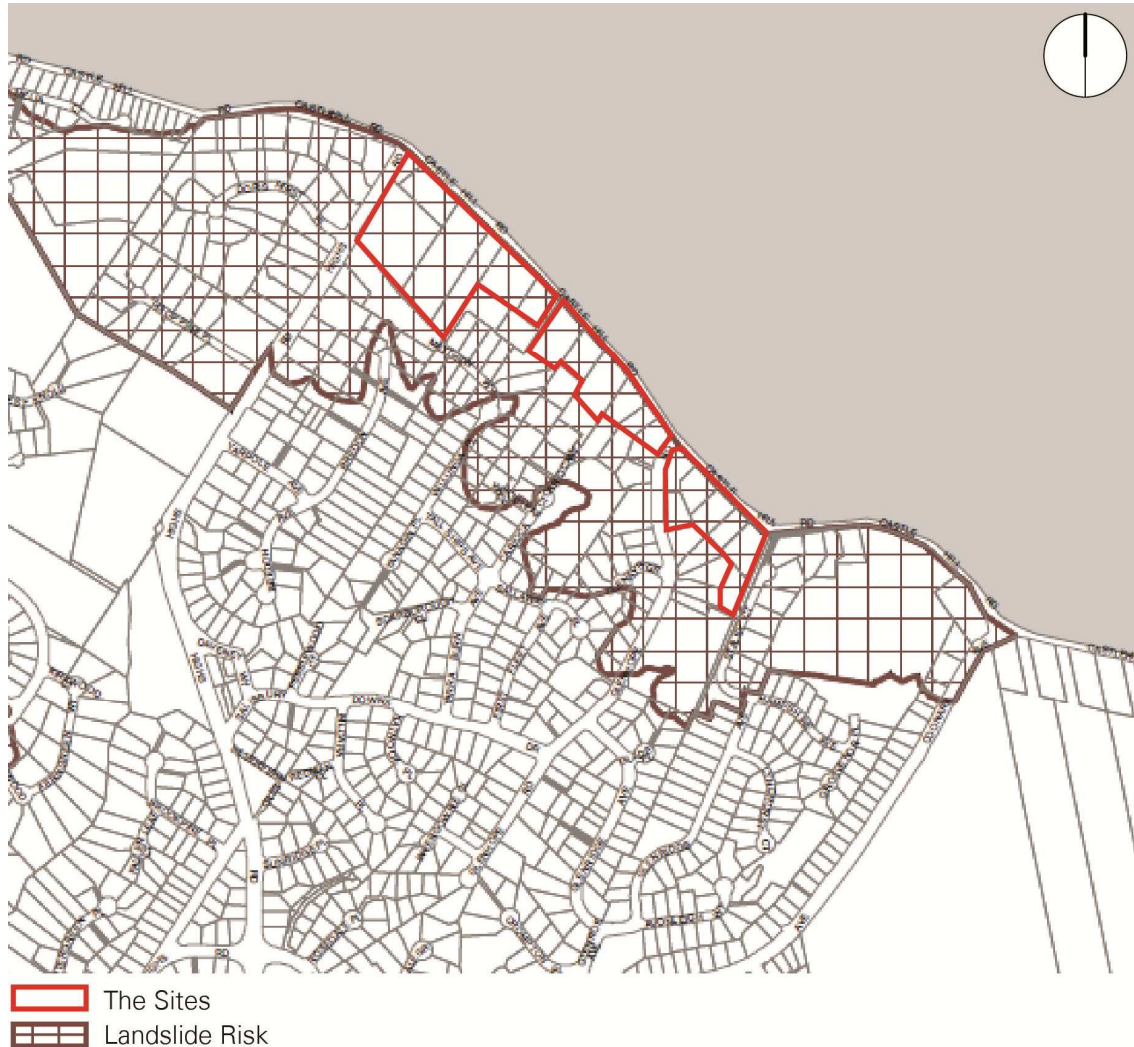


Figure 3-1 – Landslip map from The Hills LEP 2012 and the subject sites

It is understood that this E4 Living zone has been applied to the sites given this land is at risk of landslip. However, this is based upon the Soil Conservation Service of NSW (SCS) Urban Capability Study (UCS) which was prepared in 1977. This out-dated report continues to the principal document that Council has relied upon to this retain the landslip risk classification over the subject and adjoining sites directly south of Castle Hill Road.

Despite this reliance, the 1977 UCS report states clearly that:

“The report describes the capacity of the study area to support various intensities of urban use in terms of the inherent stability of the land. It is not, of itself, a recommendation for specific forms of development on specified areas. The report takes no account of other town planning considerations which must influence any final decision. It provides a useful basis onto which these may be imposed to derive a suitable development plan.” (emphasis added)

Despite this disclaimer the Council has insisted upon relying on this out-dated report to then retain the sites' landslide risk classification and restrict development to very low density residential development, much of which has resulted and encouraged the development of larger scale dwellings that could rival the scale of small residential flat buildings.

In preparing the Cherrybrook Structure Draft Plan it is our view that the landslide classification and Council's own restrictive development approach to the sites and its surrounds has contributed to the Department proposing to preclude any opportunity for increased residential densities in the land directly south of Castle Hill Road.

The landowners have instead engaged Shirley Consulting to review Council's current approach and review the 1977 SCS report, giving regard to what suitable development could be achieved on the sites and similar sites in the surrounds. A copy of Shirley Consulting's report and relevant attachments are attached at **Attachment A**.

Shirley Consulting's report finds that:

- The land instability conditions at 143-145 Castle Hill Road is of the 'surficial soil' type, where development of this land would require the removal of the surficial soil and construction/excavation within bedrock to then remove land instability issues.
- Land stability problems in the LGA have not been attributed to the site conditions, but rather the poor design of structures and inappropriate way in which land has been developed. Hence it is recommended that Council's approach should be amended to ensure suitable assessment and appropriate engineering and structural approaches are implemented to support development and minimise impacts over affected lands.
- Land instability does not preclude the opportunity for increased intensification and densities of development from occurring. Rather, higher density forms of development, such as apartments and community development (such as strata) development can assist in bringing about collective engineering solutions to deal with geotechnical/landslip affected land that cannot be achieved by very low or low scale residential development.
- The Hills Shire Council's should adopt best practice in dealing with geotechnical constraints of land identified as 'landslip'. Namely it should implement the guidelines adopted by the Australian Geomechanics Society (AGS) and implement hazard mapping that better classifies potential risk (ie. Low, medium, high). This approach to the development of instable land has been and continues to be implemented by Hornsby, Gosford, Wyong, Pittwater, Manly, Warringah, Wollongong, and Marrickville Councils.
- Based on current practice of Council to recommend particular geotechnical consultants there is potential legal risk of liability to Council should the recommended engineered solutions be employed then fail and/or cause significant impacts to the development and its surrounds.

In summary, landslide affectation should not preclude the opportunity for medium to high density residential development on the sites or other land similarly affected in West Pennant Hills, particularly as these types of development can implement collective, robust and more expensive engineering solutions to overcome geotechnical constraints.

On review of Council's report at its 14 May 2013 meeting, Council has recognised that landslide should not preclude the opportunity for increased residential density on land identified as landslide (see **Attachment B – Council's Report**), albeit it only recommends medium density residential development potential. However, it is unclear why Council's report recommends that the some subject sites be excluded from being afforded the same residential development potential as these are similarly affected and characterised sites (see **Figure 3-2**).

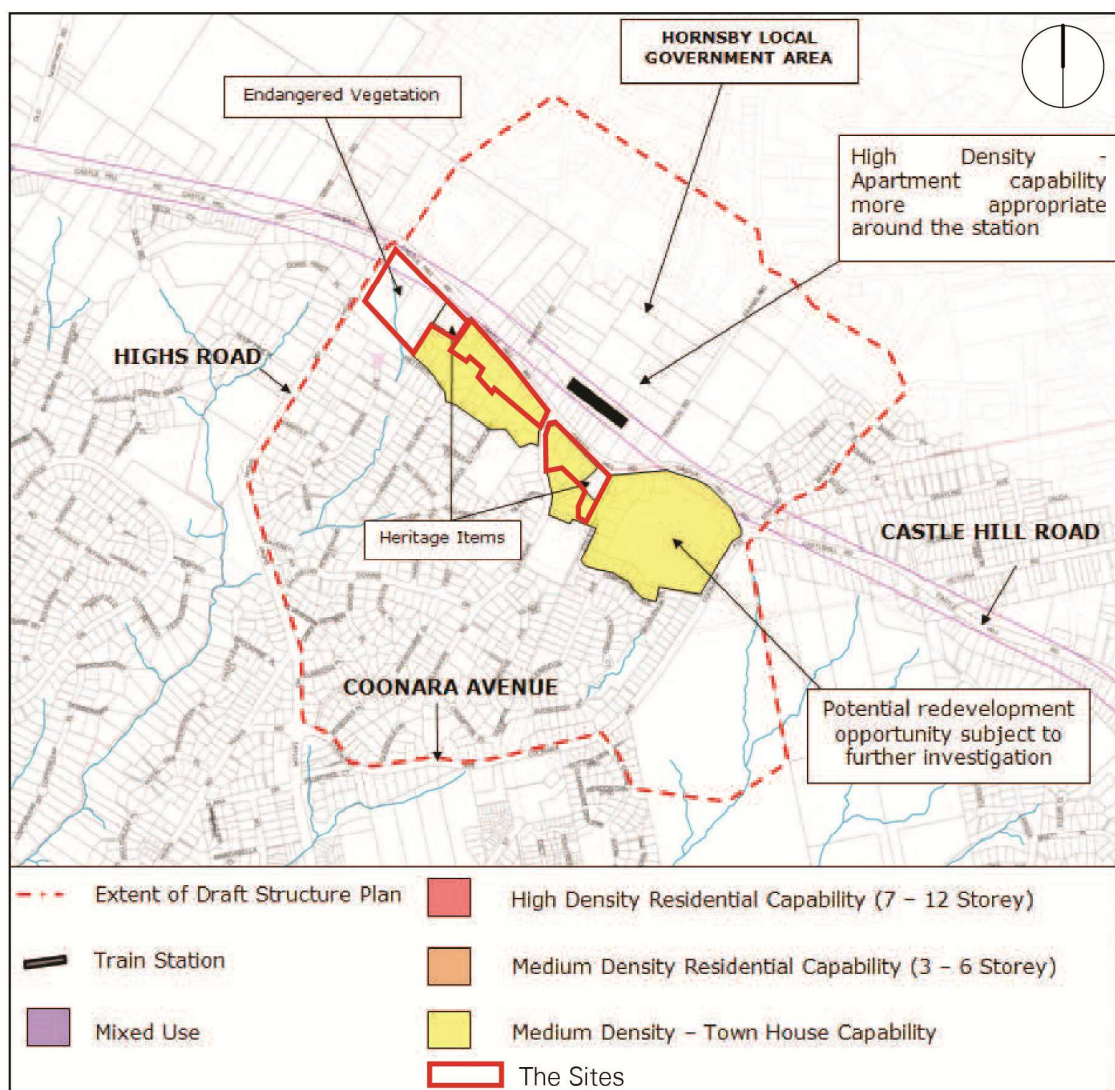


Figure 3-2 – Figure from Council Meeting Report dated 14 May and the sites that are subject of this submission

To facilitate medium and high density residential outcomes over the site we strongly recommend that DPI undertake a review of The Hills DCP geotechnical and development controls to ensure the Council's requirements do not impede medium density housing and apartment construction in the NWRL Corridor and to bring these controls in alignment with current best practice (see more detail at **Attachment A**).

3.2 Blue Gum Forest

The Cherrybrook Structure Plan indicates that *"Detailed ecological studies will be required to identify impacts on native vegetation and threatened flora and fauna as part of any future rezoning investigations within the Study area"* (ie. The Cherrybrook Station Precinct). The Structure Plan does however clearly identify that Blue Gum Forest is situated the land being the subject of this submission. And yet, the structure plan does not source where this information was obtained to then qualify that it is Blue Gum Forest and covers the area identified in the structure plan.

To illustrate what vegetation cover exists over part of the land to which this submission relates at the corner of Highs and Castle Hill Road, a recent aerial photo (taken on 14 May 2013) has been provided and included at **Figure 3-3**. This illustrates that the existing vegetation cover over these sites is not as extensive as shown in the structure plan and that these sites have in reality less than half the vegetation cover shown in the structure plan.

Furthermore, it is understood that Council is proposing to remove all trees along the southern boundary of Castle Hill Road adjacent to the sites to construct a share pathway along this edge of the road reserve. Cumulatively this will remove a significant number of trees.



Figure 3-3 – Aerial photo of sites at the corner of Highs and Castle Hill Roads (with all existing dwellings erased other than 'Dunrath') to show full extent of vegetation cover

While it is acknowledged that this is some vegetation over these sites, it has not been qualified that this constitutes a Blue Gum Forest community or that this community is of high quality vegetation to then presumably require retention. Rather it is our view that the retention of this vegetation could provide opportunities for compatible land uses (such as open space) that could support medium to high density development, which is proposed for the remaining land to which this submission relates.

4.0 KEY ISSUES

The following identifies key concerns and issues associated with the Draft Structure Plan and Cherrybrook Structure Plan. This section of the submission also makes recommendations for the Department to consider in refining and finalising the Cherrybrook Structure Plan.

4.1 Capacity for Increased Residential Densities in West Pennant Hills

The sites are suitable for medium to high residential development and should not be restricted to very low density residential density development as is currently afforded under Council's controls given that:

- the sites are ideally located within 400-600m of the future Cherrybrook Station and will have good accessibility to the station and the future mixed use centre;
- the sites and all have direct access to Castle Hill Road and/or Highs Road and are not identified as high risk for bushfire;
- each site is sizeable thereby providing immediate development opportunities to delivery medium to high residential development without the need for site consolidation. This is particularly in contrast to those residential areas north of Castle Hill Road identified for development potential – see **Figure 3.3**;

- little development exists over the each of the sites to then preclude or severely limit development outcomes;
- the geotechnical landslip classification of the sites should not preclude development. Rather higher density development such as apartments would provide consolidated and engineered outcomes that would overcome and better manage this constraint (see previous comments in Section 3.1); and
- the opportunity for the introduction of new forms of residential accommodation to West Pennant Hills, such as the provision of apartments, would inturn assist in achieving core aims set by Council's own Residential Housing Strategy and the Metropolitan Plan in that this would deliver:
 - smaller and more varied dwelling types that to suit the diverse needs of the community;
 - increased household diversity and therefore community diversity;
 - increased opportunities for ageing in place;
 - provide affordable housing opportunities; and
 - provide housing in areas that will be served by public transport.

Although the Council has recommended that some medium density development (being only town houses) should be achieved over some of the land south of Castle Hill Road (see **Figure 3-2**), the logic for which these lands were selected and not other land is unclear. For instance, much of the land within the walkable catchment and in West Pennant Hills continues to be precluded from the opportunity to deliver alternative and increase density forms of housing, even though much of this land is unconstrained. Moreover, it unclear why more other forms of residential development have been overlooked for the remainder of West Pennant Hills as this type of development would ensure efficient use of land in the vicinity of the NWRL and deliver significantly more opportunities for residential accommodation in the shorter term to then realise the vision for the NWRL

In this regard it is disappointing that if the current draft structure plan were to be delivered as it is currently, then more than half of the walkable catchment for the Cherrybrook Station would be precluded from contributing and providing opportunities for new housing in and around the station. This outcome is considered to undermine the Government's aims to encourage greater dwelling densities in the NWRL corridor, such that the Cherrybrook Station could be then regarded as underutilised infrastructure in a region that has the highest car use in the Sydney metro area. Moreover, the decision to preclude any development in over half of the Cherrybrook Station Precinct has been made in the absence of any qualified information to support this. This approach goes fully against the State Government's 'evidence based' planning methods outlined in its own White Paper for a new planning system.

In addition to this, it is questionable that those areas currently identified under the Cherrybrook Structure Plan as being suitable for medium and high density development would be in fact be able to achieve the high proportion of apartments sought by the plan (ie. a target of 1,750 additional units by 2036) given that this area:

- includes a high proportion of land that is already developed under community or strata title arrangements;
- has significant proportion of small lot and recently constructed housing in other areas, that would take considerable time to consolidate to then bring about large scale medium to high density residential development outcomes; and
- is severed by an existing and large electricity transmission easement over the proposed mixed use centre and medium density areas. This infrastructure only serves to further sterilize opportunities for new housing in the land north of the station.

On this basis the subject sites referred to in this submission and other sites with similar characteristics like these in West Pennant Hills should be identified for potential medium to high density residential development to then assist in utilising the station and providing opportunities for housing in good proximity to well connected public transport.

4.2 Poor integrated development outcomes and lack of clarity regarding infrastructure funding

Relevant to the sites the Cherrybrook Structure Plan has indicated that two additional intersections or 'gateways' (as they are referred to in the plan) are to be provided along Castle Hill between the intersections of Highs Road and Coonara Avenue. It appears these gateways will provide road connections with Robert and Franklin Roads and Castle Hill Road. However, these intersections will not provide any road connections to any existing or new roads through the land south of Castle Hill Road.

Extensive and new links are proposed by the structure plan to be provided in West Pennant Hills. These are thought to improve pedestrian and cycle connections to Castle Hill Road, and therefore presumably to the station and mixed use centre. However, it appears that these linkages will likely require the land acquisition of numerous private properties to then enable the delivery of 10 linkages in this area.

No other local or regional infrastructure is noted as being required to support the new community in the Cherrybrook Station Precinct.

Despite this, it is unclear how much of the identified infrastructure will be delivered by developer contributions or additional State or Local Government funding. However, if more than 50% of the precinct is expected to then be retained under existing very low residential densities and does not include any further opportunities for development, then the only opportunity for Local or State Governments to levy for contributions to pay for these linkages rests solely with the limited development potential north of Castle Hill Road.

Whereas if development opportunities were afforded to sites south of Castle Hill Road, then developer contributions could more likely be levied to provide these and other necessary infrastructure (such as community facilities, open space, drainage, public works, etc) that would support the new community and encourage greater use of the NWRL. This approach further supports our case that additional development opportunities are required, most particularly in West Pennant Hills, to support the station and its use and the provide linkages that would otherwise need to be paid for by other public monies.

4.3 Insufficient Studies support the draft Structure Plan

There appears to be no additional studies undertaken to support the preparation of the Draft Strategy and Cherrybrook Structure Plan and that all constraints and opportunity mapping undertaken has been based on a desktop review. Moreover, the Strategy and Structure Plans do not reference any previous studies either by Council or the Department to then qualify the indicated constraints and opportunity mapping provided and then relied upon to inform the structure plans.

There are some references to additional studies that are still to be carried out prior any rezoning of land. The proposed preparation of ecological studies is supported, but those areas identified as being ecological significant and therefore constrained should be considered as opportunities for open space and other compatible land use that will ultimately support future incoming populations in the Cherrybrook Station Precinct. Moreover, these studies should only be broad studies given that as part of any future development applications, further more detailed assessment will be required to be carried out in accordance with section 5A of the EP&A Act, or the under new legislative equivalent.

We also recognise that the prior to the rezoning of any land in the Cherrybrook Station Precinct that a suitably detailed traffic, transport and access assessment, such as a 'Transport Management Accessibility Plan' (TMAP) needs to be carried out. This assessment would confirm what improvements that would be required to roads, pedestrian and cycleway, bus routes and infrastructure and commuter parking to support the precinct and ensure integrated transport outcomes.

It is noted that Council recommends additional studies to be undertaken. These include heritage, flooding, geotechnical and drainage studies. We are of the view that these are not required prior to rezoning of any land with West Pennant Hills as Council has a good understanding of the site conditions and constraints of this area, and has suitable development controls to regulate these aspects of development. More specifically all drainage works in the area of West Pennant Hills is further regulated by the Upper Parramatta River Catchment Authority, who works closely with Council to ensure water quality outcomes and to minimise impacts of localised flood events.

4.4 Lack of clarification regarding the next steps in the process leading to rezoning

The draft Strategy lack details regarding what procedural steps will be taken to finalise the draft Strategy and Structure plans and what involvement land owners and Council will have in finalising these. Moreover other than the ecological studies, it is unclear what specific studies will be also undertaken to then presumably inform rezoning of land in Cherrybrook Station Precinct.

Clarification of these steps and the role of land owners is sought. We request that all land owners be provided further opportunities to comment and be involved in the plan making for the Cherrybrook Station Precinct.

4.5 Shared Local Government responsibilities to deliver Cherrybrook Station Precinct

Unlike other station precincts the Cherrybrook Station Precinct is unusual in that it straddles two local government areas. In this regard we recommend that the Department take the lead on the planning direction for the precinct to ensure that consolidated and integrated development outcomes are achieved, especially with regard to local and regional infrastructure that will support new communities and businesses in the precinct.

In addition to this and taking this factor into consideration, we recommend that the Department consider the use of regional infrastructure contribution planning to ensure broader infrastructure outcomes such as the delivery of regional parks and facilities and that contribution funds and infrastructure are distributed equitably.

Should you have any queries about this matter, please do not hesitate to contact me on 9956 6962 or aharvey@jbaplanning.com.au.

Yours faithfully



Amanda Harvey
Principal Planner

CC: Dr Michelle Byrne – Mayor (The Hills Shire Council)
Dave Walker – General Manager (The Hills Shire Council)
Stewart Seale – Manager Forward Planning (The Hills Shire Council)

Attachment A – Comments on Hills Shire Council Geotechnical Policies Relating to Planning – dated 8 May 2013 – Prepared by Shirley Consulting Engineers

Attachment B – Council report for 14 May 2013 Meeting – Submission on NWRL Corridor Strategy and Structure Plans