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**EDITHVALE/BONBEACH LEVEL CROSSING
REMOVAL PROJECT INQUIRY AND
ADVISORY COMMITTEE**

SUBMISSION OF KINGSTON CITY COUNCIL

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1 INTRODUCTION

- 1.1 Kingston City Council (**Council**) wishes to make submissions in response to the below road solution for the removal of the rail crossings at Edithvale and Bonbeach (the **Projects**).
- 1.2 Council personnel had the benefit of involvement and consultation through the EES, including representation of the Technical Reference Group and has been satisfied with the rigour of investigations undertaken to inform the EES preparation.
- 1.3 Understandably and typically with Projects of this scale:
- Council identified in its submission (number 226) some recommendations, which we will explain again in this submission, noting some account of these has already been taken by LXRA; and
 - Particular issues, warranting further attention have arisen during these Committee hearings which the Committee will need to consider and in respect of which the Council will comment.
- 1.4 Noting Council's broad satisfaction with the rigour of the EES it was still considered an appropriately conservative action, in the interest of Council's constituents, for Council to retain experts to review particularly important aspects of Projects. Ultimately, due to a division of tasks and expertise this resulted in four (4) expert statements, namely:
- Hydrogeology (Dr Andrei Woinarski, Senversa)
 - Geotechnical, Contaminated Land and Soil Vapour (John Piper, Senversa);
 - Wetland Impact (Lance Lloyd, Lloyd Environmental); and
 - Vegetation Impacts (Jeff Yugovic, Biosis).
- 1.5 These submissions:
- 1.5.1 discuss from a regulatory perspective under the Planning Scheme, the Incorporated Document, the EES, including its Environmental Management Framework (**EMF**) and its Environmental Performance Requirements (**EPRs**);

- 1.5.2 address in more detail specific issues arising through these Committee hearings, including Council's views and preferred recommendations in respect of those issues;
- 1.5.3 summaries particular other issues set out in Council's EES submission;
- 1.6 Issues arising requiring the Committee's attention in terms of recommendations include:
- Groundwater impact solution and contingencies at Edithvale;
 - Local drainage (surface and stormwater) solutions at both Edithvale and Bonbeach;
 - Foreshore vegetation at Bonbeach;
 - Local road user impact (cyclists, parking, infrastructure services, landscaping).
- 1.7 Broadly, the Council submits that none of those issue specific matters, subject to the implementation of appropriate solutions (or processes to achieve those solutions) should impede a positive recommendation from this Committee arising out of the EES and overall support of the Projects.
- 1.8 Notably the approach of LXRA prior to and through the Committee hearings, both through its independent experts and its representation, has been to acknowledge particular issues, provide further detail and assessment of those issues and in many cases indicating likely acceptance of pragmatic, potential, solutions.

2 THE INCORPORATED DOCUMENT AND OTHER PLANNING CONTROLS

- 2.1 Through use of an Incorporated Document it is proposed to grant overall planning approval for the Projects, exempting the need for other planning approvals. Two (2) Incorporated Documents (for Edithvale and Bonbeach) are proposed.
- 2.2 The use of Incorporated Documents for major projects, in particular, has become relatively common. The approach provides project certainty, substantial timing benefits for project delivery and subject to its proper drafting and implementation, is a beneficial and appropriate planning tool.

- 2.3 One of the benefits of the Incorporated Document approach is that it allows purpose built changes to address particular issues that can arise where some additional detail or approval process is required. It is not a carte blanche approval.
- 2.4 For example native vegetation removal is still required to comply with the relevant DELWP Guidelines, alterations to the VicRoads roads still requires Roads Corporation (VicRoads) approval and, importantly, the development must accord with the EMF approved by the Minister for Planning through the EES process.
- 2.5 It is within the Incorporated Document this Committee can recommend the inclusion of amendments or new requirements in a highly visible and more easily regulated way.
- 2.6 Another way for the Committee to identify and recommend the need to address, particular issues, is through the suggested modification of, or new inclusions in, the EPRs.
- 2.7 Balancing the appropriate location for suggested changes between the Incorporated Document and the EPRs, in a particular case, is something upon which reasonable opinion can differ, however, generally it is suggested modifications or new inclusions are better included in the EPRs unless the issue is of particular import. One important example is the Council's view that there should be an appropriate clause within the Incorporated Document in respect of local drainage discharge, which is elsewhere discussed in this submission.
- 2.8 One issue with Incorporated Documents is that they invariably include an expiry date. In the present case the controls expire on 1 December 2025.
- 2.9 Expiry provisions for an Incorporated Document is a sound approach, however one element of this is that controls within the Incorporated Document no longer apply.
- 2.10 For example the need for future groundwater Monitoring¹ reporting and implementation of Mitigation² measures (including that obligation falling upon any particular entity) is no longer legally enforceable.
- 2.11 It is apparent from the evidence that long term Monitoring and potential Mitigation measures may be appropriate and that is to be set up through the EMF and EPR process both of which must be complied with pursuant to the Incorporated Document, however only until the Incorporated Document has expired.

¹ Monitoring: This submission refers to "monitoring" (of groundwater and vegetation) on an ongoing basis.

² Mitigation: This submission refers to future potential "mitigation" action required for groundwater and vegetation.

- 2.12 Short term requirements (for example Council suggested local drainage requirements) can form part of the construction phase under the control of the Incorporated Document.
- 2.13 Contingency³ measures, for example building as part of the Project, a secondary/fallback groundwater diversion system at Edithvale, can also form part of the construction phase.
- 2.14 The long term accountability issues and how and to what extent, to manage those through either the Incorporated Document and/or EPRs relates to:
- the Edithvale trench construction and the solutions to address groundwater rising and falling; and
 - the Bonbeach foreshore vegetation; and
- these potentially include Contingency and/or Monitoring and Mitigation, or a combination of both.
- 2.15 Consideration of amendment to the EPRs or Incorporated Document may include:
- Construction Contingency at Edithvale (building in a secondary/fall-back groundwater solution);
 - requiring the identification within the Groundwater Management and Monitoring Plan (**GMMP**) of which entity or agency is responsible for Monitoring, reporting and future Mitigation of potential groundwater impacts due to the Edithvale Project;
 - confirming particular plans (eg GMMP) must actually be prepared and that the plans do not “trigger”, rather the mitigation does;
 - requiring the identification within the Groundwater Dependent Eco System Monitoring and Mitigation Plan (**GDESMMP**) of which entity or agency is responsible for any Monitoring, reporting and possible Mitigation of foreshore vegetation impacts for the Bonbeach Project;
 - whether some form of “Foreshore Work” Contingency in respect of foreshore vegetation forms part of the Project either in preference to or in addition to some ongoing Monitoring and Mitigation obligation;

³ Contingency: This submission refers to “contingency” built into the prospect to avoid or minimise potential impacts (eg a secondary/fallback groundwater diversion system at Edithvale and Foreshore Works at Bonbeach).

- 2.16 The Committee could also recommend extending the life of the Incorporated Document, thus extending the ability to enforce any Monitoring and Mitigation obligations.
- 2.17 More traditional methods of securing ongoing Monitoring and Mitigation such as Section 173 Agreements registered upon land (binding the owner of the land) are arguably not appropriate in these circumstances. Such agreements are generally not entered into in relation to public land and cannot be entered into in relation to crown land.
- 2.18 If Contingency measures are built in to the projects, namely:
- the secondary/fall-back drainage solution at Edithvale; and
 - Foreshore Works Contingency is brought upfront as part of the Project at Bonbeach;
- whilst future Monitoring and Mitigation remain important, the potential for impact is lessened.
- 2.19 With these concepts in mind the Council makes various suggestions in relation to amendment of the Incorporated Document and the EPRs, a number of which became clearer with the benefit of the Committee Hearing and for a number of which LXRA have already indicated acceptance.

3 EDITHVALE GROUNDWATER

- 3.1 Initial attention in relation to the modelled rise (upstream) and fall (downstream) of the Edithvale trench rightly focused concern on the Edithvale Wetland. However, including as part of the Committee Hearing, attention has also been drawn to more localised issues of water logging propensity and subsidence.
- 3.2 Common amongst the issues of the Edithvale Wetland and potential water logging is the proposed groundwater drainage solution at Edithvale as a measure, if properly instigated, is considered very likely (based on the modelling) to ameliorate those impacts to a sufficient degree.
- 3.3 The proposed “horizontal pipeline” solution has obvious attractions as a passive and practical solution. LXRA advanced a number of experts who support the horizontal pipeline solution, including examples of similar drainage solutions however some of those examples are best described as comparable in concept only and certainly none are identical. Council’s own expert Mr Piper recognises the value of the horizontal

pipeline solution however like experts for LXRA he raises key issues of the need for that to work through the design phase, the need to build in maintenance methods and whether some secondary/fall-back construction Contingency ought to be built in to the Edithvale Project.

- 3.4 The concept of actually building into the Projects EPRs, a requirement for a construction Contingency at Edithvale, is not considered lightly as it will add both cost and time to the Projects. If the Committee were to be satisfied with the construction of the horizontal pipeline and the prospect that some form of future Mitigation could be implemented by retrofitting an alternate groundwater diversion method then consideration of what the likely impacts of that might be is worthy.
- 3.5 The surface interception solution which was offered as a potential retrofit would bring with it delays associated with implementation, including from the time of discovery of an issue, together with substantial disruption around the railway station and trench affecting newly established vegetation, pedestrian access, parking and a range of other factors.
- 3.6 Some discussion about the potential extraction or injection of groundwater through either existing or new groundwater monitoring wells was also discussed.
- 3.7 Council's preference is that a secondary/fall-back groundwater drainage solution is implemented as part of the construction which, to the extent that it is possible, also includes a substantially passive component. Relatively superficial information given and discussion before the Panel included under-slab pipeline provision and cross connections between and/or in addition to parts of the horizontal pipeline.
- 3.8 Notably this Committee should not be called upon to specify what form of design is appropriate either for the initial solution (the current favourite is the horizontal pipeline) nor for the secondary/fall-back solution.
- 3.9 In our respectful view the Committee ought to recommend an appropriate modification to the EPRs that specifies the need for the additional necessary design work, which still incorporates the relevant peer review and includes the installation of the secondary/fall-back drainage solution as part of the Project.
- 3.10 In addition the GMMP (EPR GW3) should require the identification of the relevant entity or agency to conduct the future Monitoring, maintenance of the groundwater diversion infrastructure and to implement any Mitigation.

- 3.11 An obvious candidate for that role is VicTrack as relevant infrastructure will be located within railway land. Even in respect of monitoring wells located off VicTrack land, VicTrack remains the logical candidate as the owner of the railway land and infrastructure. No doubt VicTrack will be able to enter into arrangements with other appropriate entities, upon whose land Monitoring wells are located. Those are likely to include the Kingston City Council and DELWP and Melbourne Water.
- 3.12 Whether the Committee wishes to include an obligation for VicTrack (or the other nominated entity) to enter into agreements effectively as part of its GMMP obligations, to ensure the ability to undertake that monitoring may be an unnecessary additional step.
- 3.13 One important issue relates to the potential transfer of contamination through groundwater to locations which it previously would not be transferred. The Committee should assess whether the transfer of contaminated groundwater from where it was going, to another location along the horizontal pipeline, is satisfactory. We suggest it is unlikely the EPA would support this. Importantly, it appears likely the groundwater diversion system can be built to avoid or minimise this.
- 3.14 A number of further suggested changes to the EPRs in respect of groundwater (**GW**) and contamination (**CL**) will be made after presentation of these submissions and LXRA and Committee comment.

4 LOCAL DRAINAGE

- 4.1 Council has been in ongoing discussions with LXRA representatives regarding appropriate drainage solutions, in particular for discharge from the respective trenches through their stormwater collection systems and in relation to aboveground stormwater runoff.
- 4.2 Dealing with stormwater discharging from the two (2) Project sites raises capacity issues and stormwater quality issues in terms of appropriateness to release to waterways or Port Phillip.
- 4.3 Further to the information advanced in relation to surface water at the Committee, which concentrated on capacity at the Project localities and the need for on-site retention and primary treatment, LXRA have also been advised of the need for construction of local stormwater infrastructure connection (local pits and pipelines and the like) together with relatively significant financial contributions to the Council by which Council has or will enhance stormwater retention, treatment and potential re-use and/or discharge to the environment.

- 4.4 Authorisation for discharge occurs for most normal developments through the Planning Permit controls for the development to impose a requirement for an appropriate stormwater plan and design to be prepared and the imposition of drainage contributions where appropriate. The Incorporated Document process avoids that opportunity and whilst the EPRs may have objectives incorporated they do not provide direct power to the Council to have its requirements met. The EPRs contain purposes and objectives however in the majority of cases the relevant plan or signoff is not allocated to a particular body, rather the plan is prepared under the Alliance contracting arrangement and must simply exist. One example where this is not the case is the need for the GMMP to be prepared at the satisfaction of the EPA.
- 4.5 The Council seeks in the Incorporated Documents new sub-clauses to clauses 4.2.11 (Edithvale) and 4.2.10 (Bonbeach) as follows:

“Drainage

Drainage must be provided to the development:

- (a) through a design; and*
- (b) onsite retention and treatment capacity, local infrastructure connections and financial contributions to outfall treatment, re-use and discharge;*

to the satisfaction of the Kingston City Council.”

- 4.6 Local drainage has revealed itself as an important issue, particularly at Edithvale where the presence of the Special Building Overlay and the most recent groundwater modelling and more importantly that the groundwater diversion system at Edithvale works well, including Contingency. Notably it is appropriate in the Incorporated Document to include particular provision securing the requirements of key agencies that otherwise would be incorporated in the normal Planning Permit process such as DELWP in relation to offsets and VicRoads in relation to Category 1 Road access.
- 4.7 We respectfully suggest incorporation of Council's ability to apply appropriate drainage requirements should be similarly achieved.

5 FORESHORE VEGETATION

- 5.1 With respect of the experts and views of others, the evidence in relation to the Bonbeach foreshore vegetation would appear to be that whilst impact on that vegetation appears unlikely there is at least a level of uncertainty of what that modelled groundwater draw down impact may be.
- 5.2 This is not a criticism of the EES process or work, to the contrary, Council's expert Mr Yugovic agrees that assuming the groundwater modelling is correct it is difficult to predict there will be a discernible impact, particularly when issues of climate change and weather variability are contemplated.
- 5.3 LXRA's ecology expert advanced the proposition that applying a series of improvements to foreshore vegetation now to improve its health and resilience would effectively be a form of Contingency. That may take the form of land and soil treatments, weeding, further planting, fencing and other protection measures.
- 5.4 One of the issues with Bonbeach is that as there is no groundwater diversion system in place, given the modelling predictions do not warrant it, there is no immediately available method to apply Mitigation measures in respect of groundwater.
- 5.5 Implementation of a Contingency for the foreshore vegetation now could also occur through funds provided to the relevant land manager, which in the circumstances, given the location and ability to deliver such improvements, would appear to be the Council.
- 5.6 An alternative to specifying a particular set of Foreshore Works through a project or scheme, could be to adopt an assumption that the relevant vegetation will effectively be lost and calculate some form of offset which again could be paid to a fund (managed by Council) for foreshore works.
- 5.7 LXRA have been cooperative and forthcoming in discussions in relation to this issue however it is not yet resolved.
- 5.8 As to implementation, modification could be made to the relevant EPR reflecting the need for agreement between LXRA and Kingston City Council with reference to the purpose of that agreement (that is either the implementation of actual works or some form of funding arrangement) as the Committee sees fit.

- 5.9 A further question is what level (if any) the Committee recommends in respect of ongoing Monitoring of the foreshore vegetation at Bonbeach. Further whether that Monitoring ought to include vegetation groundwater inspection, or only include groundwater level monitoring.
- 5.10 Thereafter whether it is appropriate to specify a requirement for future Mitigation if, in combination, the Project together with the groundwater impact is reasonably seen to be impacting the foreshore vegetation.
- 5.11 It is the Council's view that:
- Contingency of foreshore vegetation improvements instigated as part of the Bonbeach Project should be instigated; and
 - the imposition of Monitoring or Mitigation obligations should be modified in part as for credit, those Contingency measures, to expire when the Incorporated Document expires.

6 LOCAL ROAD USER IMPACTS

- 6.1 The Committee hearing has raised the issue of bike lanes on Station Street, in particular the potential loss of bike lanes around the railway station and the balancing act between cars, bikes and to the extent relevant, future landscaping.
- 6.2 It is difficult for Council to provide even early views around preference for retention of on-road cycle marking, the value of a potential shared pedestrian/cycling path contemplated, the loss of car parking on Station Street or a designed landscape design outcome. Part of that difficulty is the decision about Council's view would be the Council (via resolution) however a range of other factors will impact.
- 6.3 There are a significant number of factors to be contemplated in respect of Council adopting a firm view including:
- the need to engage both the commuter and recreational cycling community, including high volume bike users (eg schools);
 - expectations of residents and local traders around car parking;
 - tolerance of the local community for car parking spill in to residential streets;
 - impacts on existing and the capacity for replacement of vegetation;

- the expectation of the rail operator;
- lane width capacity analysis (road/cycle demand management);
- other cycle options (eg long beach trail – roughly parallel 1.3 kilometres to west);
- bus stop implications;
- impact of other works (eg Mordialloc Freeway potentially creating cyclist road space on current highway corridor).

6.4 There is not enough information before this Committee for any definitive recommendations to be made however certainly comments within the Committee report or the inclusion of particular references in the EPRs may provide the opportunity to drive a “sooner rather than later” assessment of this issue and appropriate decisions in relation to the balancing of needs or perceived needs.

6.5 The EPRs T1 and T2 concentrate on the construction phase whereas T3, T5 and T6 relate to pedestrian, cyclist and vehicle access and use. T5 gives a level of prominence or precedence to “*no net loss of car parking*” which appears to have directed at least initial design proposals in relation to the shared path arrangements. Any modifications to be suggested would likely occur in these EPRs.

7 STATION DESIGN AND LANDSCAPING

7.1 One of the issues with the Urban Design Guidelines is that they are entirely within the LXRA Design Framework and the listed considerations are, with respect, very high level. For example new powerpoles (now located within the railway) will be relocated onto a new footpath creating further visual impact, an outcome that tends to slip through the higher level approval process.

7.2 Recommendation 4 in the Council submission asks that the station design and landscaping include a consideration of resilience and comfort for the community in the climate change future and include consultation about this and vegetation replacement during the design.

7.3 The vegetation removal over the estimated 2.5 kilometre stretch for the 2 Projects over the length and width of the rail corridor is extremely significant. Council would prefer to be in a position whereby an appropriate landscape plan is provided as would be entirely normal for even much smaller private projects. An additional Urban Design Guideline requirement that required incorporation of a detailed landscape plan would be appropriate.

7.4 We suggest UD1 be amended on the following basis:

“UD1 Urban Design Guidelines

Design Projects in accordance with the LXRA Urban Design Framework and project specific Urban Design Guidelines, including landscape design and plans. The Urban Design Guidelines must consider:

- a. identity*
- b. connectively and waive finding*
- c. urban integration*
- d. resilience and sustainability*
- e. amenity*
- f. vibrancy*
- g. safety*
- h. accessibility*
- i. resilience and comfort for the community in a climate change future*
- j. vegetation replacement as a design and development component*

Seek the advice of the LXRA Urban Design Project Advisory Panel (chaired by the office of the Victorian Government Architect, and includes officers of Kingston City Council) during the preparation of detailed design to ensure an appropriate response to the LXRA Urban Design Framework.”

8 OTHER COUNCIL RECOMMENDATIONS

EMS table designating key plan preparation and approval

- 8.1 Various plans are referred to through chapter 9 of the EES required under the EMF and under the EPRs.
- 8.2 Table 9.1 sets out various roles and responsibilities (noting as an aside no designated responsibility for ongoing Monitoring or Mitigation).
- 8.3 Table 9.2 sets out a list of roles and plans but does not designate responsibilities and table 9.3 sets out key environmental management documentation, again not designating responsibility for preparation.
- 8.4 Table 9.4 refers to the major plans required and indicates approval requirements with one overarching reference to approval for the EMF (with EPRs) in the Minister for Planning with approval status for State of Victoria (presumably DEDJTR as the legal entity within which LXRA exists).
- 8.5 The EPR is then referred to a series of other plans (eg Business Disruption Plan, Spoil Management Plan, Acid Sulphate Soil Management Plan, Groundwater Dependent Eco System Monitoring and Mitigation Plan (Foreshore Native Vegetation), Groundwater Dependent Eco System Monitoring and Mitigation Plan (Edithvale Wetland), Groundwater Management and Monitoring Plan, Public Transport Disruption Management Plan, Urban Design Guidelines). None of which, with the exception of the Groundwater Management and Monitoring Plan which is to be to the satisfaction of the EPA, designate who is to approve the relevant Plan. Also if these various plans are to be enforced as an element of compliance with the Incorporated Document, there is no reference to whom the finalised approved plan should be provided.
- 8.6 It should be noted that the various high level plans described at table 9.4 are referenced within the EPRs as well.
- 8.7 Council's suggestion was that a table much like that appearing at 9.4 is reprepared to describe the relevant "Document/Plan/Guideline", designate responsibility for who is to prepare it, designate which entity it to approve or adopt it, with an extra column of "copy to" which should include the Minister and Kingston City Council, given their respective status under the Planning Scheme.

- 8.8 Council is not suggesting that there be additional or different approval entities, noting that in a number of cases approval or adoption of a particular plan is something quite appropriately within the operation of the Alliance.
- 8.9 Council does recommend a minor change to the suggested Incorporated Document to make it clear all plans under the EMF and EPR must be complied with. A modification to the last provided version of the respective Incorporated Documents, at clause 4.2.1 reads:

“Prior to the commencement of development (excluding preparatory buildings and works under clause 4.3), an Environmental Management Framework (EMF) must be approved by the Minister for Planning. The EMF must:

- a) include the Environmental Performance Requirements (EPRs) and the plans specified for approval in the EMF and EPRs applicable to the design, development and operation of the Project;*
- b) be prepared generally in accordance with the Environment Management Framework contained in the Environment Effects Statement for the Edithvale and Bonbeach Level Crossing Removal Projects except where otherwise agreed to by the Minister for Planning including to give effect to the outcomes of the Minister’s Assessment under the Environment Effects Act 1978.”*

Communication of potential land and/or groundwater contamination

- 8.10 Council sought reporting to relevant land owners of any land or groundwater contamination identified.
- 8.11 By way of example EPR CL2 requires an Acid Sulphate Soil Management Plan. There is no requirement for the locations and extent of potential acidic sulphate soils (once established) to be advised to EPA or any private or public landowner potentially impacted.

- 8.12 Similarly, whilst in part addressed above, GW2 in relation to groundwater performance outcomes does not require the reporting of any groundwater contamination which may move through and from the groundwater, including no obligation to report to any relevant agency or other public or private landowners that may be impacted.

Spoil Management Plan

- 8.13 Council's recommendation 5 asked that LXRA engage with Council to explore the potential for sites within the Kingston Green Wedge to be utilised as locations for the depositing of fill.
- 8.14 Notably EPR CL1 currently at item f relates to disposal sites and a possible modification to this EPR could include:

“f. identifying potential sites for the management and disposal of spoil, including consultation with Kingston City Council to identify proximate sites within the Kingston municipality”.

9 CONCLUSION

- 9.1 Kingston City Council has valued the opportunity to participate both through this Committee Hearing and earlier with LXRA and other stakeholders through the EES preparation process.
- 9.2 Broadly, Kingston City Council encourages the Committee's positive consideration of the Projects and the works undertaken through the EES, noting the need for and appropriateness of, various recommendations to refine and improve the EES outcomes in the form of modifications to the Incorporated Document or the EPRs.

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