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## Summary of cases

1. This case involved an appeal from the Land and Environment Court regarding a breach of s 76A(1) of the *Environmental Planning and Assessment Act 1979 (EPA Act)* by clearing an area of native vegetation on land. The Court of Appeal upheld the trial judge's decision.
2. This case concerned an appeal against an Order issued by the Council under s 124 of the Local Government Act 1993 to keep no more than 33 cats on the premises.
3. This case involved three charges of contempt for failing to comply with a number of court orders imposed in 2015 regarding the use of premises as a boarding house.
4. This case involved an appeal under s 97 of the EPA Act against a refusal of a development application for the construction of a residential housing development. The Court dismissed the appeal and refused the development application for a residential housing development.
5. This case concerned an appeal under s 97 of the EPA Act against a deemed refusal of a development application for demolition and construction of four dwellings. The Court upheld the appeal.

The material contained in the Land and Environment Court Reporter is of the nature of general comment only. No reader should rely on it without seeking legal advice.





## 1. [Elachi v Council of The City of Shoalhaven \[2016\] NSWCA 15](#)

This case concerned Mr Elachi's appeal of the Land and Environment Court's decision that he had breached s 76A(1) of the Environmental Planning and Assessment Act 1979 (EP&A Act) by clearing an area of native vegetation on land at a beach.

In dismissing the appeal and upholding the trial judge's decision, the Court of Appeal (Basten JA, Ward JA and Sackville AJA agreeing) confirmed the relationships between local environmental plans and development control plans (DCPs), and clarified the interaction of the Native Vegetation Act 2003 (NV Act) with development approval processes.

### **Legislative Background**

If an environmental planning instrument provides that specified development may not be carried out except with development consent, a person must not carry the development unless such a consent has been obtained and is in force, and the development is carried out in accordance with the consent and the instrument (EP&A Act s 76A(1)).

Whether consent for the development was required in this case depended on the *Shoalhaven Local Environmental Plan 2014 (LEP)*. Relevantly, cl 5.9:

- applied to trees or vegetation prescribed by a DCP;
- prohibited injuring or destroying any tree or other vegetation to which that DCP applied, without development consent or other Council permit; and
- provided an exception for clearing authorised by the NV Act.

The *Shoalhaven Development Control Plan 2014 (SDCP)* prescribed trees or vegetation for the purpose of cl 5.9. Relevantly to these proceedings, the SDCP provided that clearing authorised under the NV Act does not require a development approval.

### **Issues and consideration**

The Court considered the following issues:

#### *1. Whether the LEP prohibited Mr Elachi carrying out clearing without approval*

Clause 5.9 of the LEP prohibited injuring or destroying any tree or other vegetation prescribed by the SDCP, without development consent or other Council permit. Despite some difficulties with the drafting of the LEP and the DCP, the Court found that the trees and vegetation prescribed by the SDCP included the vegetation cleared by Mr Elachi. Accordingly, Mr Elachi needed development consent to carry out the clearing.

#### *2. Whether the SDCP exempted Mr Elachi's clearing from the need for a permit or development consent*

The Court held that Mr Elachi was not assisted by the SDCP's exemption for clearing of native vegetation authorised by a development consent or property vegetation plan under the NV Act (or otherwise permitted by the NV Act). The main reason was that the SDCP exemption had no





operation. The LEP addressed the question of permission, authority and exemption under the NV Act and required Mr Elachi to obtain consent to clear the vegetation. The SDCP's provisions were categorised as being either substantially the same as or inconsistent with the LEP. Where the provisions of the SDCP were inconsistent with the provisions of the LEP, the LEP prevailed.

### 3. *Whether the NV Act permitted the clearing*

The NV Act permits clearing in certain circumstances, including for 'routine agricultural management activities', which Mr Elachi relied on. The Court of Appeal held that the NV Act did not assist Mr Elachi because section 21 of the NV Act did not permit an otherwise permitted activity where an approval is required under the EP&A Act. In any case, Mr Elachi's clearing did not fall within the definition of 'routine agricultural management activities'.

### **Conclusion**

The Court of Appeal dismissed Mr Elachi's appeal, upheld the orders made by the Land and Environment Court at first instance, and required Mr Elachi to pay the Council's costs.

## 2. [McCudden v Cowra Shire Council \[2016\] NSWLEC 14](#)

This case was an appeal by Mr McCudden against an order given by Cowra Shire Council (**Council**) under s 124 of the *Local Government Act 1993* (NSW) (**LG Act**) to keep no more than 33 cats on his land at any one time. The Court ordered that separate questions be determined regarding the validity of the Council's order.

### **Background**

For more than four years, Mr McCudden has conducted a shelter for abandoned or unwanted cats on the site located in Cowra. The cats were being kept on 3 principal areas of the site, including a shed, a three bedroom dwelling house and a secondary enclosed outdoor area containing two small colorbond sheds.

In 2012 the Council started receiving complaints concerning the manner in which the site was being used. The number of cats reported to have been kept on the site between July 2014 and May 2015 ranged between 174 and 200. On 6 August 2015, the Council issued an order to Mr McCudden under s 124 of the LG Act requiring that no more than 33 cats be kept on the site at any one time (**the Order**). The Order also sought to restrain the manner in which the cats were to be kept on the site.

Paragraph 1 of Schedule A to the Order set out the reason why the order was given. It stated as follows:

- a. you are the occupier of the Premises;
- b. cats are being kept on the Premises in inappropriate numbers and inappropriate conditions;  
and
- c. the welfare of the cats is being significantly compromised as a consequence of:





- i. the cats being kept in groups that are excessively large and therefore socially dysfunctional,
- ii. the cats not having appropriate space and adequate resources to display normal and preferred behaviours, and
- iii. insufficient human resources (carers) being available to properly care for the cats.

### Separate questions

After filing his appeal, Mr McCudden sought the determination of separate questions that challenged the validity of the Order given by the Council. Mr McCudden alleged reasons given for the making of the Order were either insufficient in law or could not, in law, found the giving of the Order. Having considered the submissions made by Mr McCudden and the Council, Craig J determined the following questions.

*Question 1: Upon the proper construction of the Order, does paragraph 1c of Schedule A identify the only reason for which the order was given?*

Craig J determined that the proper construction of the Order indicated that paragraph 1c of Schedule A did not identify the only reason for which the Order was given.

His Honour determined that the submission by Mr McCudden, that the only reason for the Order was that expressed in paragraph 1c of Schedule A, was inconsistent with the proper construction of a statutory order. The proper construction of a statutory notice or order necessitates greater regard to practical considerations and such orders are not to be interpreted as if they were drafted with the precise language expected of a statute.

The Court accepted the Council's submission, that a fair reading of the Order as a whole sufficiently revealed that there was more than one reason expressed for giving the Order, namely the two reasons expressed in subparagraph b, together with the reason expressed in subparagraph c.

*Question 2: Were the reasons given in paragraph 1c relevant considerations to be taken into account in deciding whether to give an order under s 124 of the LG Act; and if irrelevant, was there power to give the order under s 124 of the LG Act.*

The objects of the LG Act require that a council has regard to the principles of ecologically sustainable development. Under its charter, a council must also manage, develop, protect, restore, enhance and conserve the environment in a manner that is consistent with the principles of ecological sustainable development.

Craig J concluded that regulatory measures directed to animal welfare, as stated in paragraph 1c, may be seen as directed to an aspect of the management and control of the environment. It was therefore relevant to the Council's consideration when determining to give the order that it did under s 124 of the LG Act and within Council's power.





*Question 3: For the purpose of determining whether the Order is invalid because the reasons given are inadequate, can the Council lead and rely upon evidence directed to those reasons? If it cannot do so, is the order invalid because of inadequacy of reasons?*

The Court determined that the terms of the Order were sufficient in themselves to provide the reasons required by s 136 of the LG Act, as they exposed the rationale for giving the Order when read as a whole. Craig J accepted the Council's submission, that it would defy the reality of the Order for the Court to be denied receipt of evidence directed to events that occurred on or prior to the Council issuing the Order.

Further, his Honour did not accept that an inadequacy of reasons could invalidate an order that conforms to the requirements for giving such an order by reference to the Table to s 124 of the LG Act.

*Question 4: If the Order is invalid, does the Court have power to make an order under s 180(4) of the LG Act or s 39(2) of the Land and Environment Court Act 1979 (**Court Act**) and, in particular, does it have the power to modify or substitute the Order for any other order that the Council could have made.*

Craig J determined that a legally defective order given by a council is not devoid of any legal consequence until it is declared invalid by a court of competent jurisdiction. Pending any such determination, the order has sufficient existence in law to found an appeal under s 180(1).

In reaching that conclusion, his Honour noted that section 39 of the Court Act, coupled with the broad discretion afforded to the Court by s 180(4) of the LG Act, demonstrate the capacity of an appellant under s 180(1) to have considered afresh the decision to give an order under s 124 and, if applicable, the terms of such an order.

## **Conclusion**

The answers to the separate questions did not resolve the proceedings. The matter was stood over for further directions for the purpose of merit determination.

### **3. [Cumberland Council v Khoury \(No 3\)\\* \[2016\] NSWLEC 55](#)**

This case involved three charges of contempt brought by Holroyd City Council (**Council**) against Mr Khoury for failing to comply with a number of court orders imposed in 2015 regarding the use of premises at South Wentworthville as a boarding house.

## **Background**

In 2003, the Council gave Mr Khoury development consent for the erection of a part one-storey, part two-storey duplex development on his property at 36 Frances Street, South Wentworthville. However the development as constructed, was not within the classification under the National Construction Code for dwellings of the type approved by the Council.

Two sets of orders were made by the Court on 12 February 2015 and 7 April 2015. Both sets of orders required that Mr Khoury cease the use of the premises as a boarding house, with the latter also requiring him to demolish and remove certain structures erected on the premises within 6





months. When Mr Khoury was served with copies of the orders of the Court made on 7 April 2015, he was also served with a Penal Notice that explained that disobedience of the order rendered him liable to imprisonment or to sequestration of property in addition to liability for a fine.

On 10 March 2016, an application by the Council for Utility Service Cessation Orders proposed to be directed to the relevant water and electricity supply authorities was also heard by Pain J in class 1 proceedings. Justice Pain made the orders sought by the Council on that occasion.

## **Contempt charges**

The three charges of contempt brought by the Council against Mr Khoury were:

- failure to abide by the order of 12 February 2015 to cease use of his premises as a boarding house;
- failure to abide by the further order to the same effect of 7 April 2015; and
- failure to abide by the order of 7 April 2015 requiring Mr Khoury to undertake a series of remedial works.

Moore J noted that he had to be satisfied that an appropriate factual basis existed beyond reasonable doubt for him to conclude that the premises were being used as a boarding house in breach of the February 2015 and the first of the April 2015 orders.

## **Evidence of Council**

The Council led evidence relating to the Council Development Compliance Officer's inspection, assessment, and conversations with residents of the premises as well as expert reports in relation to the ongoing construction and use of the building, which Moore J noted were not challenged on any relevant factual basis during cross-examination by Mr Khoury. The Council also led affidavit evidence of a NAB officer regarding business records of Mr Khoury's that suggested the premises were being used for the purpose of a boarding house.

Moore J accepted the Council's evidence, that at the date of inspection, the works required to be carried out by the April 2015 order had not been carried out. His Honour was also satisfied that there had been no application by Mr Khoury or any other person for consent to use the premises as a boarding house as required by the Holroyd Local Environmental Plan 2013 and that the premises continued to be used as such, in breach of the February 2015 and April 2015 court orders.

## **Evidence of Mr Khoury**

Although Mr Khoury expressly and by inference stated that he was motivated to provide affordable accommodation to those in the community who were unable to afford accommodation other than of the type that he was prepared to make available at the rental levels that he was charging, Moore J stated that was a matter to be taken into consideration at sentencing.

The submission by Mr Khoury, that the presence of personal effects, unmade beds and refrigerators should not be a basis for concluding that any of the unoccupied units were in fact occupied by a boarder, was not accepted by Moore J. Conversations between the Council's





Development Compliance Officer and residents provided a sufficient basis for his Honour to conclude that the premises were, as at the date of the inspection, occupied in a fashion to provide an adequate foundation to satisfy the relevant element of the definition of ‘boarding house’.

### **How should the contempt be classified?**

His Honour determined that the contempt in the proceedings demonstrated a deliberate and ongoing intention to disregard the orders of the Court. The contempts fell within the worst category and were therefore regarded as contumacious.

### **Conclusion**

Moore J convicted Mr Khoury on all three charges of contempt and deferred sentencing for six months. His Honour also referred Mr Khoury to the Probation and Parole Service for the purpose of preparing a presentence report as to his suitability to serve a full-time custodial sentence.

\*Holroyd City Council became part of Cumberland Council as a consequence of the *Local Government (City of Parramatta and Cumberland) Proclamation 2016* from 12:10pm on 12 May 2016.

## **4. [Mount Annan 88 Pty Ltd v Camden Council \[2016\] NSWLEC 1072](#)**

This case involved an appeal by Mount Annan 88 Pty Ltd (**the Applicant**) pursuant to s 97 of the *Environmental Planning and Assessment Act 1979* (NSW) against a refusal by Camden Council (**Council**) of a development application for the construction of a residential housing development on a vacant site.

### **Background**

The site is located in Mount Annan and zoned B2 Local Centre under *Camden Local Environmental Plan 2010 (LEP)*. The site is currently vacant and largely cleared of vegetation with a total area of 5.5ha. Retail/commercial development of the Mount Annan town centre adjoins the site to the south and east. The areas to the west, south and east surrounding the Mount Annan town centre area are characterised by residential dwellings.

The Applicant sought development consent for the construction of a 3 storey residential housing development that included 246 dwellings in 9 precincts and 16 separate buildings. The development included 12 different unit types. The 1 bedroom dwellings were contained on ground level, while the 2 and 3 bedroom dwellings were designed over two levels and located above the ground floor units. Basement car parking was to be provided for the dwellings.

### **Issues**

The key issues in dispute between the parties were whether:

- the proposal was a prohibited development within the zone; and
- the proposal breached the height development standard and the written request provided by the Applicant justified the contravention.





## Development controls

The relevant development controls that the Court was required to consider related to characterisation of use and maximum building height. Under the LEP, the maximum building height permitted in zone B2 is 10m, although cl 4.6 enables the development standard to be varied. The *Camden Development Control Plan 2011 (DCP)* sets out the desired planning outcome in relation to design and other relevant controls.

### Is the proposed development a prohibited use?

Under the LEP 'residential accommodation' is a prohibited use in zone B2. However the LEP provides that development for the purposes of 'multi dwelling housing' is permitted on the proposed site with development consent.

The issue between the parties was whether the proposed development was characterised as 'multi dwelling housing' and is permissible with consent, or 'residential flat housing' and is prohibited. For the development to be characterised as 'multi dwelling housing' the dwellings must be on one lot of land, each with 'access at ground level'.

The Applicant argued that the development satisfied the definition by ensuring that each dwelling was accessible from ground level, with direct access to ground level dwellings or via stairs to the upper level dwellings. Importantly, the stairs to the upper dwellings formed part of each dwelling. The Council submitted that the words 'at ground level' had to be compared with other definitions in the LEP Dictionary where the word 'access' was used. It was argued that the other definitions used the phrase 'access to' rather than 'access at', so have a different meaning to the words used in the definition of 'multi dwelling housing'.

The Court agreed with the submissions of the Applicant, finding that the proposed development was 'multi dwelling housing' and a permissible use within the B2 zone.

### Did the proposal breach the height development standard?

All but 3 of the proposed buildings breached the maximum building height permitted in zone B2. However, consent could be granted for non-compliant development if the Court was satisfied that the Applicant's written request demonstrated:

- that the proposed development was consistent with the objectives of the zone;
- that the proposed development was consistent with the objectives of the standard in question;
- that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case and matters required to be demonstrated have been adequately addressed; and
- that there are sufficient environmental planning grounds to justify contravening the development standard and matters required to be demonstrated have been adequately addressed.





To demonstrate that the development was consistent with the objectives of the height development standard, the buildings had to be compatible with the height, bulk and scale of both the existing and future character of the locality. The Court agreed with the Council's expert evidence that the development had an overwhelming amount of visual sameness in built form that was incompatible with the nearby residential development in the locality. The Court accepted that the Council's concerns about lack of variety and the impacts of the height, bulk and scale would remain valid even if the future character of the locality transitions to a higher density form.

The Court was also not satisfied that the written request provided by the Applicant demonstrated that the development standard was unreasonable or unnecessary in the circumstances or that there were sufficient environmental planning grounds to justify contravening the standard.

## Conclusion

The Court dismissed the appeal and refused the development application for a residential housing development.

## 5. [Zhang and Anor v Council of the City of Ryde \[2016\] NSWLEC 1179](#)

This case was an appeal by Mr Zhang and Mr Wang (**the Applicants**) pursuant to s 97 of the *Environmental Planning and Assessment Act 1979* (NSW) against a deemed refusal by Council of the City of Ryde (**Council**) of a development application for the demolition of all existing improvements and the construction of a four dwelling in-fill affordable housing development.

### Background

The site is located in Denistone and zoned R2 Low Density Residential under the *Ryde Local Environmental Plan 2014 (LEP 2014)*. It is rectangular in shape with a total area of 1,011.7sqm and street frontage to Blaxland Road. A brick single storey dwelling house with a tiled roof and detached fibro shed/garage is already located on the site.

The area surrounding the site is characterised by detached dwelling houses and multi-dwelling housing development. Multi-dwelling housing is a permissible use in the R2 Low Density Residential zone under LEP 2014. The relevant development controls that applied to the development included maximum building height and density standards. The *Ryde Development Control Plan 2014 (DCP 2014)* and *State Environmental Planning Policy (Affordable Rental Housing) 2009 (SEPP Affordable Housing)* also applied to the proposed development.

### Issues

The Council argued that the proposed development must be refused as the development was:

- not in-fill affordable housing consistent with provisions of SEPP Affordable Housing in that the site was not in an 'accessible area';
- incompatible with the character of the local area, pursuant to SEPP Affordable Housing; and





- in breach of the height development standard and density development standard in the LEP 2014.

### **Is the site within an ‘accessible area’?**

SEPP Affordable Housing defines ‘accessible area’ to include land that is within 400 metres walking distance of a bus stop used by a regular bus service that has at least one bus per hour servicing the bus stop between 06.00 and 21.00 each day from Monday to Friday and between 08.00 and 18.00 on Saturday and Sunday.

The issue between the expert town planners centred on the Sunday bus service. The Council’s expert argued the Sunday service did not satisfy the ‘one bus per hour’ standard, as three Sunday bus services fell outside the hourly timetable standard by a maximum of 3 minutes.

The Court held that a small amount of common sense needed to apply and it would be unreasonable to refuse the application on the basis of three exceedances for services on a Sunday where the maximum exceedance is 3 minutes, particularly given the practical uncertainty of a bus arriving exactly at the time set out in the timetable. The Commissioner determined that the site was within an ‘accessible’ area for the purposes of SEPP Affordable Housing.

### **Is the development compatible with the character of the area?**

SEPP Affordable Housing requires the Court to make a finding on ‘whether the design of the development is compatible with the character of the local area’, which requires a consideration of the local area, the character of the local area, and whether the design of the proposed development is compatible with the character of the local area. The expert town planners agreed that the local area was the visual catchment in which the development will be viewed and that the character of the local area was predominately single storey residential development but with other multi dwelling housing development.

In determining compatibility with the character of the local area, the Court accepted the opinion of the Applicants’ expert town planner, that under the R2 zone, a range of land uses are permissible and as a consequence, the area surrounding the site is comprised of a range of built forms.

Further, the proposal provided for an outcome which would be consistent with both the existing character of the local area as well as with the desired future character envisaged by the Council through its existing controls.

The Commissioner was also satisfied that the proposed development adequately addressed the principal design elements that make up the Desired Future Character for a dwelling or an attached dual occupancy in DCP 2014 such that it was ‘compatible with the character of a local area’, including the streetscape.

### **Did the proposal breach the height development standard and the density development standard?**

Under LEP 2014, the maximum building height permitted in the R2 Low Density Residential zone for any dwelling that does not have street frontage is 5m. The expert town planners agreed that two of the four proposed dwellings breached this height standard. The proposed development also





breached the density development standard, which specifies only 3 dwellings with 1, 2 or 3 bedrooms are permitted on the site. The development proposal had 4 dwellings on the site.

The Court considered the Applicants' written request for exemptions to these development standards, on the basis that:

- the proposed development was consistent with the objectives of the zone;
- the proposed development was consistent with the objectives of the standard in question;
- compliance with the development standard was unreasonable or unnecessary in the circumstances of the case and matters required to be demonstrated had been adequately addressed; and
- there are sufficient environmental planning grounds to justify contravening the development standard and matters required to be demonstrated had been adequately addressed.

The Court was satisfied that the Applicants' written request satisfied each of these four preconditions in relation to the breach of both the height development standard and density development standard. In particular, the Court held that the zone objectives were broad and did not specifically relate to the matters of whether the height standard or density standard should be varied. Similarly the specific objectives of the height and density standard were considered to not preclude the proposed development.

## **Conclusion**

The Court upheld the appeal and approved the development subject to conditions.





## Definitions

**Appeal** – an application or proceeding for review by a higher tribunal or decision maker.

**Consent authority** – the body having the function of determining the application, usually a council.

**Deemed refusal** – where a consent authority has failed to make a decision in relation to a development applications within the statutory time limit for determining development applications.

**Development** means:

- a. the use of land, and
- b. the subdivision of land, and
- c. the erection of a building, and
- d. the carrying out of a work, and
- e. the demolition of a building or work, and
- f. any other act, matter or thing referred to in section 26 that is controlled by an environmental planning instrument, but does not include any development of a class or description prescribed by the regulations for the purposes of this definition.

**Development Application** – an application for consent under Part 4 of the *Environmental Planning and Assessment Act 1979* (NSW) to carry out development but does not include an application for a complying development certificate.

**Environment** – includes all aspects of the surroundings of humans, whether affecting any human as an individual or in his or her social groupings.

**Existing use rights** – rights under Planning Legislation to continue previously lawful activities on land which would no longer be permitted following the introduction of changes to environmental planning instruments.

**LEP** – Local Environmental Plan, planning tool created by councils to control the form and location of new development.

**Local heritage significance** – in relation to a place, building, work, relic, moveable object or precinct means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.

**Objector** – a person who makes a submission to a consent authority objecting to a development application for consent to carry out designated development.

**Occupier** – includes a tenant or other lawful occupant of premises, not being the owner.

**Planning principle** – statement of a desirable outcome from a chain of reasoning aimed at reaching, or a list of appropriate matters to be considered in making, a planning decision.





**Premises** means any of the following:

- a. a building of any description or any part of it and the appurtenances to it
- b. a manufactured home, moveable dwelling and associated structure
- c. land, whether built on or not
- d. a tent
- e. a swimming pool
- f. a ship or vessel of any description (including a houseboat).

**Procedural fairness** – this term is interchangeable with “natural justice” and is a common law principle implied in relation to statutory and prerogative powers to ensure the fairness of the decision making procedure of courts and administrators.

**Prohibited development** means

- a. development the carrying out of which is prohibited on land by the provisions of an environmental planning instrument that apply to the land, or
- b. development that cannot be carried out on land with or without development consent.

**Public authority** includes:

- a. a public or local authority constituted by or under an Act
- b. a government Department
- c. a statutory body representing the Crown.

**State heritage significance** – in relation to a place building, work, relic, moveable object or precinct means significance to the State in relation to the historical, scientific, cultural, social, archeological, architectural, natural or aesthetic value of the item.

**Subpoena** – a document by which a court compels a person to attend a court to give evidence or to produce documents within that person’s possession.





## Useful links

Land and Environment Court website: [www.lec.justice.nsw.gov.au](http://www.lec.justice.nsw.gov.au)

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Case Law NSW: [www.caselaw.nsw.gov.au](http://www.caselaw.nsw.gov.au)

Environment Protection Biodiversity Conservation Act - subscription to EPBCA group:  
<http://groups.yahoo.com/group/epbc-info/>

Environment and Planning Law Association NSW: [www.epla.org.au](http://www.epla.org.au)

Development and Environmental Professionals Association: [www.depa.net.au](http://www.depa.net.au)

Urban Development Institute of Australia: [www.udia.com.au](http://www.udia.com.au)

Property Council: [www.propertyoz.com.au](http://www.propertyoz.com.au)

Housing Industry Association: [www.hia.com.au](http://www.hia.com.au)

Planning NSW: [www.planning.nsw.gov.au](http://www.planning.nsw.gov.au)

Environment Australia: [www.erin.gov.au](http://www.erin.gov.au)

Environmental Protection Authority (NSW): [www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

EDONet: [www.edo.org.au](http://www.edo.org.au)

NSW Agriculture: [www.agric.nsw.gov.au](http://www.agric.nsw.gov.au)

NSW National Park and Wildlife Service: [www.nationalparks.nsw.gov.au](http://www.nationalparks.nsw.gov.au)

Planning Institute of Australia: [www.planning.org.au](http://www.planning.org.au)

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