

From: [Anaiis Sarkissian](#)
To: [DA Admin Mailbox](#)
Subject: FW: OBJECTION TO PROPOSED ALTERATIONS AND ADDITIONS TO RESIDENTIAL DEVELOPMENT, PROPOSED CONSTRUCTION OF A BOAT SHED, WATERWAY ACCESS STAIRS AND LANDSCAPING, DA 2025/0136, PPTY: 60 HUDSON PARADE, CLAREVILLE
Date: Monday, 24 March 2025 8:44:11 AM
Attachments: [Photos.pdf](#)

From: Tony Moody
Sent: Friday, 21 March 2025 1:03 PM
To: Anaiis Sarkissian; Council Northernbeaches Mailbox
Cc: Maria McCrossin
Subject: RE: OBJECTION TO PROPOSED ALTERATIONS AND ADDITIONS TO RESIDENTIAL DEVELOPMENT, PROPOSED CONSTRUCTION OF A BOAT SHED, WATERWAY ACCESS STAIRS AND LANDSCAPING, DA 2025/0136, PPTY: 60 HUDSON PARADE, CLAREVILLE

ATTENTION: ANAIIS SARKISSIAN, SENIOR ASSESSMENT OFFICER

RE: OBJECTION TO PROPOSED ALTERATIONS AND ADDITIONS TO RESIDENTIAL DEVELOPMENT, PROPOSED CONSTRUCTION OF A BOAT SHED, WATERWAY ACCESS STAIRS AND LANDSCAPING, DA 2025/0136, PPTY: 60 HUDSON PARADE, CLAREVILLE

Dear Anaiis,

I refer to the abovementioned Development Application (DA) seeking approval of Northern Beaches Council (Council) for the proposed “Alterations and Additions to Residential Development, Proposed Construction of a Boat Shed, Waterway Access Stairs and Landscaping”, on a property known as 60 Hudson Parade, Clareville (subject site).

The DA seeks the approval of Council.

I was requested by Maria McCrossin and Michael Still of 62 Hudson Parade, Clareville, to provide my professional opinion on the above DA.

I confirm that I have examined the documents, plans, reports and Statement of Environmental Effects (SEE) lodged in support of the DA.

My Clients' property lies generally to the south of the subject site.

I have inspected my Clients' property.

I have also viewed the subject site not only from my Clients' property, but also the adjoining small tidal beach on Pittwater waterways (to the west) and Hudson Parade (to the east).

For the reasons referred to in this submission, I am strongly of the opinion that the proposed development is most unreasonable and is not worthy of approval of Council.

Prior to providing my points of objection, I wish to make the following preliminary comments:-

- By way of introduction, I wish to advise you of my qualifications and experience. I am a Consultant Planner with 15 years' experience in 3 Local Government Councils, including 9 years as a Senior Development Control Planner. I hold a Bachelor of Town Planning Degree from the University of NSW and a Bachelor of Laws Degree (Hons) from the University of Technology, including a High Distinction in Environmental Studies. I previously practiced as a Solicitor and currently work as a Consultant Planner. I have appeared as an Expert Planning Witness for 9 Councils in the Land and Environment Court (Court) and I have also appeared in numerous Appeals as a Court Appointed Expert.
- My thanks to you for granting me an extension in time in order that I can lodge my submission by close of business today.
- I also express the appreciation of my Clients and I to our recent on-site meeting with your fellow Council Officers to discuss the proposed development.
- One of the primary grounds of objection against the proposed development is that of the impacts on the local eco-system, particularly the stand of vegetation, including the Pittwater Spotted Gum Forest, being an endangered ecological community. I stress that I am not an Arborist nor Horticulturalist and defer to the advice of Geoff Burton, Arborist and Horticulturalist. It can be fairly said that based on his qualifications and experience, Geoff Burton is an eminent Consulting Arborist, Horticulturalist and Garden Designer.

My points of objection against the proposed development are as follows:-

1.0 RESPONSES TO SEE

- In the first paragraph on page 4, the SEE claims that the “boatshed has been integrated into the landform provided with the green roof to reduce its visual impact whilst providing for the retention of significant tree to the north of the structure”. For the reasons raised in this submission and the submission from Geoff Burton, I strongly disagree. I particularly note the following:-
 - i. I consider that the proposed “green roof” is a very unsatisfactory response to the visual impact of the proposed boatshed. Simply put, the green roof will do little to ameliorate the visual impact of the boatshed. Please refer to additional comments below in Section 4.0 and 5.0 below.
 - ii. In terms of the claimed “retention of a significant tree to the north”, I refer to the Arboreal Advice of Geoff Burton who raises concerns relating to the likely impacts of the proposed excavation and construction works on the adjoining significant tree and other trees in the stand of trees.
- In the middle of page 4, the SEE claims that “we confirm that other locations for the boatshed were investigated and deemed less suitable”. There is no evidence of these purported investigations of alternative locations. On this point, I note the previous advice of Council Officers that they considered that there was indeed an alternative preferred location closer to 58 Hudson Parade, resulting in a significant reduction in likely impacts on the stand of trees in the Foreshore Area.
- At the bottom of page 4, the SEE again claims that the proposed boatshed will have “minimal impact” as viewed from adjoining residential properties and from the public domain. This is not the case and for the reasons referred to in Section 4.0 and 5.0 below. I strongly disagree and consider that the bulk and scale of the proposed boatshed are objectionable elements, including the additional potential damage to the adjoining stand of trees. Again, please refer to the advice of Geoff Burton.
- In the 2nd paragraph on page 5, the SEE claims that “the proposed works are permissible with consent and consistent with the legislative framework as it relates to this form of development on this particular site”. I disagree because:-
 - i. As noted by Chief Judge McClellan of the Court in the judgement of BG Properties Pty Ltd v Lake Macquarie Council [2004] NSW LEC 399 in which his Honour held that “in most cases it could be expected that the Court will approve an application to use a site for a purpose for which it is zoned, **provided of course the design of the project results in acceptable environmental impacts**” (emphasis added). In other words, the fact that the proposed boatshed is permissible is not the end of the assessment. The design of the proposed boatshed must result in “acceptable environmental impacts” (emphasis added).
 - ii. Contrary to the claim in the SEE, the proposed development is not “consistent with the legislative framework”. The proposed development breaches numerous Planning Controls of Council. Please refer to additional comments below in Section 4.0 and 5.0 below.

- In the bottom point on page 5, the SEE claims that “the proposal will not give rise to any unacceptable streetscape or residential amenity impacts”. I am not concerned with the streetscape impact of the proposed development. My major concerns relate to the objectionable elements of the proposed boatshed, impact on existing vegetation and visual impact from the Pittwater waterways arising from the proposed building envelope, loss of trees and vegetation, the dimensions of the boatshed and the raised front elevation to the waterways.
- At the bottom of page 6, the SEE claims that boatsheds are also common along the waterfront. This claim is correct. I, however, stress that I am not saying that a boatshed cannot be developed on the subject site. I am saying that the design and location of the current proposed boatshed are objectionable and there is an alternative location, as previously identified by Council Officers.
- In the 1st paragraph on page 7, the SEE states that “the locality evidences a common thread being landscaped, tree frontages and subdued external finishes”. I fully agree. I, however, consider that the proposed landscaping does not comply with a number of Planning Controls of Council and the proposed boatshed is not “subdued” due to the objectionable elements of the proposed boatshed.
- As noted on page 8, the subject site is zoned “C4 Environmental Living”. This zoning and the environmental attributes of the locality require a sensitive response. I strongly consider that the proposed boatshed is not sensitive to the environment given its length, elevation at the foreshore and the impacts on existing vegetation.
- I note page 9 of the SEE contains reference to the Arborist’s Report prepared by Martin Peacock, Tree Care, in support of the proposed development. Again, I am not an Arborist and defer to the advice of Geoff Burton, Arborist. I should, however, wish to make the following responses:-
 - i. As previously advised, I consider that the provision of a “green roof” to the proposed boatshed is a facile response to the unsatisfactory visual impact of the proposed boatshed. On this point, I also note the Planning Principle of then Senior Commissioner Roseth in *Super Studio v Waverley Council* [2004] NSWLEC91 in which he held that proposed landscaping should be given minor weight in terms of privacy due primarily to the likelihood that proposed landscaping will not be maintained. Similarly, the proposed green roof would not likely be maintained to reduce visual impact. As you are aware, one of your fellow Council Officers at our recent meeting made a similar comment to this effect in saying that the proposed landscaping cannot resolve adverse visual impact, primarily from the tidal beach and the waterways.
 - ii. The report of Martin Peacock has not provided comment on the following facts:-
 - a. As part of the original proposed development, there were numerous protected trees permitted to be removed on the subject site, particularly including spotted gums which are scheduled as an endangered species under the **Biodiversity Conservation Act NSW 2016 (BC Act.)**

- b. The fact that 2 trees were illegally removed, and those trees were required by Council to be retained in perpetuity. The illegal removal of these 2 trees has not been referred to in any of the DA documentation. This is not a criticism of Martin Peacock because or other Consultants because I strongly suspect that Martin Peacock and other Consultants were not advised of the illegal removal. Nonetheless, the Applicant, Builder and or a representative of the Applicant should have advised Council of the illegal removal of the 2 trees in the front setback area.
 - c. That Council's determinations in respect of DA2022/1715 and Mod2024/0422 were conditional upon identified trees on the subject site being retained in perpetuity by Council.
- At page 10, the SEE evidences the objectives of the zoning, being C4 Environmental Living. The subject site and its adjoining environs are clearly of high environmental quality which are also reflected in the fact that one of the objectives is "to encourage development that retains and enhances the environment and foreshore vegetation and wildlife corridors". For the reasons referred to in this submission and the Arboreal submission of Geoff Burton, I consider that the proposed development is insensitive to the above objective.
- In the bottom of page 12, the SEE proposes the removal of a number of trees as detailed within the accompanying Arborist's Report prepared by Martin Peacock of Tree Care on behalf of the Applicant. Martin Peacock also considers that such tree loss appropriately compensates for the loss of trees through implementation of the integrated site landscape regime. I strongly disagree and say as follows:-
 - i. The Applicant in respect of DA 2025/0136 is in breach of the conditions outlined in respect of DA 2022/1715 and Mod 2024/0422 by reason of the illegal removal of Trees 3 and 4 identified **for retention** in Landscape Referral Response dated 28/09/2023 with respect to DA2022/1715. These trees have been **cut down**. Photographs of the stumps are attached. See Drawing DA_2 Rev 2 and DA_400 Rev 1 for siting of Trees 3 and 4. Photos of the stumps are attached.
 - ii. Based on the advice of Geoff Burton, Arborist, there will be additional adverse impact on existing trees within the Foreshore Area because of the established interconnectedness between the native flora growing on the subject site.
 - iii. The Consultants for the Applicant also appear to rely upon a green roof to compensate for the adverse visual impact and the removal of trees. Again, I consider that the proposed green roof is a facile response to the adverse environment impacts that would be caused by removing T17 and seriously threatening the viability of T16 as noted in the Arboreal Report prepared by Geoff Burton.
 - iv. The Applicant's Consultants also consider that the proposed landscaping will compensate for the loss of trees. Geoff Burton does not agree because replacement trees will take many years to re-establish the existing ecosystem. Furthermore, the scenic presentation

of the mature trees, their canopy and the wildlife habitat they provide, will also be lost for many decades to come before the replacement trees grow to a mature height.

- At the bottom of page 12 and the top of page 13, the SEE makes reference to the Flora and Fauna Assessment prepared by Narla Environmental which contains an acknowledgment that 0.01ha, being 100sqm, of native Pittwater Spotted Gum vegetation will be impacted as a result of the proposed development. By any measure, an area of 100sqm (being 0.01ha) is significant, particularly as it is all below the Foreshore Building Line of the subject site, is on the foreshore of Pittwater and the stand of protected Spotted Gum are contained within the area which would be affected.
- The subject site has suffered a significant loss in the number of trees due to the original approved development and the illegal removal of an additional 2 trees required to be retained by Council. To contemplate additional tree loss arising from the proposed development based on the advice of Geoff Burton is, in my opinion, totally unacceptable given the environmental qualities of the locality and the conditions of the initial DA for redevelopment of the subject site which continue to apply to the whole of the subject site, regardless of this further DA
- On pages 15 and 16, the SEE refers to the Planning Controls relating to the “Avalon Beach Locality”. I simply again refer to the objectives of the Avalon Beach Locality which speak of the locality having a “leafy character that should be maintained and enhanced”. I consider that the proposed development rather than “maintaining and enhancing” the leafy character will reduce the leafy character.
- Pages 20 and 21 of the SEE make comment in relation to Control C1.1 entitled “Landscaping” under Pittwater Development Control Plan 21 (DCP 21). Please refer to my responses below in Sections 4.0 and 5.0.
- In the middle of page 24 the SEE refers to “landscaped area environmentally sensitive land” under Control D12.10. The SEE claims that there is compliance with Control D12. 10. I disagree for the reasons referred to in this submission.
- At the bottom of page 24, the SEE notes that the proposed boatshed does not comply with Control D15.15, but claims variation is “worthy of merit” without identifying why. I strongly disagree for the reasons referred to in Sections 4.0 and 5.0 below.
- At page 27, the SEE claims that “the proposed boatshed is to integrate with the existing development along the foreshore and set within an enhanced landscape setting”. I strongly disagree because in addition to the reasons already outlined, the proposed development will not enhance the landscape setting but rather will significantly reduce the landscape setting due to the erection of the proposed boatshed, excavation works and the loss of at least one spotted gum and 2 established bottlebrush trees at the Pittwater foreshore. The SEE, on behalf of the Applicant, asserts that the proposed green roof on top of the proposed boatshed will ensure the landscaped character remains a dominant feature of the area when viewed from the water and that any “adverse amenity impact in terms of visual impact or scenic quality are minimised”. I strongly disagree. The proposed green roof is a facile and specious response to the environmental qualities of the area and

should be given little weight, particularly as the design requires significant excavation in the Foreshore Area and raises the boatshed form by some 60cm from the height of the existing sea wall at the foreshore to Pittwater. Again, I note that Council's Landscape Officer at our recent meeting expressed a similar opinion that landscaping cannot solve the problem of adverse visual impact.

- In the Conclusion section at pages 33 and 34, the author of the SEE reiterates previous comments made in the SEE. For the reasons referred to in this submission, I consider that the proposed development is a very unsatisfactory response to the environmental qualities of the locality.

2.0 ADVICE OF GEOFF BURTON, CONSULTING ARBORIST AND HORTICULTURALIST

- I note the advice of Geoff Burton, Arborist and Horticulturalist.
- I again defer to the advice of Geoff Burton given that I am not an Arborist nor Horticulturalist.
- I wish to briefly note the comment of Geoff Burton that "Pittwater DCP identifies outcomes as the retention of vegetation to visually reduce the built form, the conservation of natural vegetation and biodiversity and the preservation and enhancement of the rural and bushland character of the area". It is the strong opinion of Geoff Burton that the proposed development does not achieve these Planning Outcomes, and I fully support this opinion of Geoff Burton.

3.0 ILLEGAL TREE REMOVAL

- As you and fellow Council officers acknowledged at the recent on-site meeting, there are 2 trees in the front setback area which Council Officers required to be retained "in perpetuity" under Condition 71 of the approved development. These 2 trees have been clearly **cut down**.
- Clearly, neither the Applicant nor the Builder has advised Council of this illegal removal of the subject trees. It is also clearly the case that the Applicant's Consultant Planner and Arborist were also not advised of the Illegal removal of the 2 trees. Obviously, Council was also not advised.
- Consistent with the advice of you and your fellow Council Officers, one of my Clients have lodged a complaint with the Compliance Section of Council relating to the illegal removal of the 2 trees which were required by Council to be retained in perpetuity.
- I note that my Client has also forwarded a complaint to Council regarding the illegal removal of the 2 trees, and other irregularities.

4. BREACHES OF LANDSCAPED AREA CONTROL UNDER PITTWATER 21 DEVELOPMENT CONTROL PLAN (DCP 21)

- The SEE claims that there is compliance with Control D1.14 entitled "Landscaped Area-Environmental Sensitive Land".
- The Landscaped Area Control requires that **"the total landscaped area shall be**

60% of the site area”.

- Variation of the 60% Control is permitted to include some impervious areas but only **“provided the Outcomes of this Control are achieved”** (emphasis added). Thus, if the Outcomes are not achieved, Council must not vary its Landscaped Areas Control to include any impervious areas.
- I consider that the proposed development **does not** comply with the Landscaped Areas Control under D1.14 for the following reasons:-
 - i. I wish to firstly note that there are discrepancies in a number of figures contained in the DA documents, plans and reports. For example, the area of the subject site is not consistent throughout the DA documents, plans and reports. I assume that you will use the area of the subject site on the Deposited Plan when calculating the required “Landscaped Area” under Control D1.14 of DCP 2021.
 - ii. I note the drawing entitled “Calculations-Landscaped Areas” being Drawing No. DA03 dated 28 August 2023. During our above meeting, I requested that Council require a Surveyor to certify the calculated “Landscaped Area” on the above drawing. I am pleased to note the advice of Council Officers that Council has computer technology sufficient to precisely check the accuracy of the “Landscaped Area” figure of 55.5% referred to in the above drawing.
 - iii. Assuming that the figure of 55.5% of Landscaped Area in the Applicant’s above drawing is correct, there is clearly a breach of Control D1.14 “Landscaped Area”. DCP 21 requires a Landscaped Area of 60% not 55.5% .
 - iv. As previously noted, variation is permitted by Council, **but subject to the Outcomes being achieved.**
 - v. It is clearly the case that the following Outcomes are **not** achieved:-
 - a. One of the required Outcomes is that vegetation is retained and enhanced to visually reduce the built form. The vegetation has **not** been retained. On this point, I refer to the 2 trees that have been illegally removed as outlined above and again note that the 2 trees were required to be “retained in perpetuity”. Thus, compared to the Council approved plans, 2 trees have now been removed which must be a relevant consideration of Council’s assessment of the current DA. As you are keenly aware, an Applicant must not benefit from a “wrong doing”. The loss of 2 trees is a relevant factor for consideration in the assessment of the Landscaped Area.
 - b. It is clearly the case that the illegal removal of the 2 trees in the front setback area is a relevant matter for Council’s consideration as a part of its assessment of the DA. Firstly, the subject site comprises the totality of the subject site and not just the area proposed to be occupied by the proposed boatshed. One must consider the totality of the subject site given the fact that the DA

is over the subject site. Secondly, if the 2 trees had not been illegally removed, they would still be contributing to the local ecosystem, as well as contributing to the “leafy character” of the Avalon Locality. Now that this is not the case, there is adverse streetscape impact and adverse environmental impact arising from the removal of the 2 trees. Thirdly, one of the required Outcomes to vary the Landscaped Areas Control is that existing vegetation be retained. Obviously, this Outcome has not been achieved because the 2 trees required to be retained in perpetuity by Council Officers have now been illegally removed. Thus, the Outcome requiring retention of vegetation cannot be satisfied. Finally, to disregard the illegal removal of the 2 trees will, in effect, give benefit to the person who undertook the illegal removal. Simply put, the Applicant should not benefit from an Illegal act by granting variation of the Landscaped Area Control.

- c. Furthermore, based on the advice of Geoff Burton, Arborist, further additional trees in the Foreshore Area will likely be impacted by the proposed development which is also contrary to a number of the required Outcomes.
- d. Thus, I strongly consider that the Outcomes of the Landscaped Area Control requiring retention of vegetation are not achieved.

- vi. A second Outcome which is breached is the requirement for “conservation of natural vegetation and biodiversity”. The illegal removal of 2 trees and the likely impact of existing foreshore trees based on the advice of Geoff Burton, is clearly contrary to this Outcome.
- vii. A further Outcome which is breached is the requirement for the preservation of the “bushland character of the area”. The illegal removal of 2 existing trees in the front setback area and the likely adverse impact on existing trees in the Foreshore Area is contrary to the above Outcome.

- Overall, I am of the strong professional opinion that there is a breach of the Landscaped Area Control by the proposed landscaped area and that variation of the Landscaped Area Control should not be allowed due to the fact that the Outcomes are not achieved by the proposed development.
- Given the environmentally sensitive nature of the subject site and locality and the significant impact on previously existing trees based on the previous approval, the illegal removal of 2 trees in the front setback area and likely adverse impact on existing trees in the Foreshore Area, I strongly consider that the proposed landscaped area is unacceptable and contrary to relevant Planning Controls.

5.0 OBJECTIONABLE ELEMENTS OF PROPOSED BOATSHED

- I consider that the proposed boatshed breaches a number of Planning Controls of Control D15.15 entitled “Waterfront Development”, including the following:-

- i. It does not “blend with the natural environment” by reason of the likely adverse impact on existing trees canopy cover and reduction of wildlife habitat based on the advice of Geoff Burton, Arborist and Horticulturalist.
 - ii. The length of the proposed boatshed is in breach of the 6.0m length requirement.
 - iii. The proposed boatshed is elevated above the line of the Estuarine Hazard Control. On this point, the extended height of the proposed boatshed above the line of the Estuarine Hazard Control will be clearly evident from the waterway and tidal beach of Pittwater.
 - iv. As previously advised, I consider that the proposed green roof which is proposed by the Applicant to resolve adverse Visual Impact is a facile response to this significant concern.
- On this point, the extent of proposed excavation to accommodate the boatshed is obviously of concern to Geoff Burton and myself. I further note that Council Officers expressed similar concern relating to the proposed location when it assessed the original application. Council Officers considered that the proposed boatshed should be relocated towards the northern boundary of the subject site well away from the existing trees. Geoff Burton holds a similar opinion.
- I must add one final point regarding the proposed boat shed. It is inexplicable to me that the proposed boat shed is not only elevated higher than the required floor level to comply with Estuarine Hazard Control, but the proposed boatshed provides no details of how crafts/boats are raised and dropped to and from the water. The Plans indicate a hoist will be used. I, however, have not seen details of the proposed hoist to raise and drop the boats and craft to and from the water to the proposed boatshed. Details of any proposed hoist must be provided as part of the current DA in order that adjoining owners and Council have the opportunity to assess the proposed hoist and associated machinery. Issues such as visual impact and potential noise impact must be assessed at this stage. I cannot understand why the floor level of the proposed boatshed is raised so much higher than required by the Estuarine Hazard Control and, as a result, a hoist is required but no such details have been provided. Details of the proposed hoist must be provided by the Applicant now as part of the assessment of the DA and the adjoining owners, including my Clients, must be given the opportunity to assess such details.

6. **CONCLUSION**

- For the reasons referred to in this submission, I am strongly of the opinion that the proposed boatshed and associated works are most unreasonable and are insensitive to the high sensitivity of the immediate environment.
- The proposed boatshed has a number of objectionable elements which are contrary to the high environmental qualities of the immediate locality.
- Of particular note is the opinion of Geoff Burton contained in his detailed assessment which is highly critical of the likely adverse impacts on the existing

stand trees in the Foreshore Area.

- A further objection is the inadequate Landscaped Area arising from the proposed development. I strongly consider that current breach of the Landscaped Area Control should not be accepted by Council because variation should only be allowed where the specific Outcomes are achieved. For the reasons outlined in Section 4.0, I strongly consider that the Outcomes are not achieved by the proposed development.
- The illegal removal of 2 previously existing trees, which were required to be retained in perpetuity, is also of significant concern and is a relevant matter impacting Council's consideration of this DA insofar as this DA proposes the removal of additional trees on a site where a condition of consent of the current development is that the remaining trees were to remain in perpetuity. Obviously, Council has not been advised by the Applicant nor the Builder of the removal of the illegal removal of these 2 previously existing trees, contrary to Condition 71 of Council approval. This illegal removal is a very relevant factor in Council deciding whether to allow variation of its Landscaped Area Control. Given the illegal removal of the existing trees and the advice of Geoff Burton that the proposed boatshed will have an adverse impact on the existing trees in the Foreshore Area, I strongly consider that variation of the Landscaped Area control to allow this boatshed development is without merit for the reasons I have identified and would be an unreasonable exercise of Council's discretion in the circumstances outlined above.
- Not only will the proposed development breach Council's Landscaped Area Control, there are objectionable elements of the proposed boatshed building and associated works which also warrant refusal of the Application.
- For the reasons referred to above, including the advice of Geoff Burton, I strongly consider that the proposed development is not worthy of approval.

Again, thank you for the time and courtesy of yourself and fellow Council Officers in attending the recent meeting at my Clients' property.

Thank you also for considering this submission and the submission of Geoff Burton.

Yours Sincerely,

Tony Moody

[Redacted Signature]

U10/21 Sydney Road, Manly 2095

[Redacted Address Line]

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