

**DISCUSSION PAPER –
LEGISLATIVE FRAMEWORK
CALLAN PARK MASTER PLAN
JUNE 2010**

Introduction

Callan Park has been a major issue for the residents of Leichhardt Local Government Area for more than a decade. In 2001, the NSW Government attempted to close the Psychiatric hospital on the site and sell the land off for redevelopment - the community won a very successful community grassroots campaign and stopped it.

After this, the former member for Port Jackson, the Hon. Sandra Nori introduced legislation into Parliament to protect the site from redevelopment resulting in the passing of the Callan Park (Special Provisions) Act 2002.¹

This discussion paper describes:

- The objects of the Callan Park (Special Provisions) Act 2002;
- Other legislation relevant to Callan Park;
- Permissible uses under the Callan Park (Special Provisions) Act 2002 and other legislation relevant to Callan Park; and
- The implications of applicable legislation on the Master Plan

This discussion paper identifies certain issues of statutory interpretation which need clarification so that the Master Planning process proceeds on a well informed basis.

It concludes that the provisions of the Callan Park (Special Provisions) Act 2002 establish clear objectives and boundaries for the 2010 Master Plan.

¹ Leichhardt Council website: History of Callan Park

EXECUTIVE SUMMARY

Leichhardt Council's tender document for the Master Plan for Callan Park states that the Master Plan must be prepared in accordance with the provisions of the Callan Park (Special Provisions) Act 2002 (the Callan Park Act) and State Environmental Planning Policy 56 – Sydney Harbour Foreshores and Tributaries (SEPP 56). As the first stage of planning, Council called for a series of discussion papers, beginning with a discussion paper on the Callan Park Act.

This site specific Act provides the framework for a very clear vision for the site. The Long Title of the Callan Park Act describes its purpose well: 'An Act to preserve the public ownership of Callan Park; to protect its current features and restrict its future use; and for other purposes.'

The Callan Park Act determines how the site is to be used and managed. It limits permitted land use on the site to health, community and education facilities. Further community and education facilities must provide services on a 'not-for-profit' basis. There are a wide range of uses that could potentially fall within these terms.

The Callan Park Act also describes how land should be leased and controls building envelopes, floor area and retention of existing open space. These factors affect the range of options that can be explored in the Master Plan.

The Callan Park Act requires that the environmental planning instruments that apply to the site are those that existed immediately before the Act commenced on 24 December 2002. The environmental planning instruments that are so 'frozen in time' include:

- State Environmental Planning Policy 56 – Sydney Harbour Foreshores and Tributaries (SEPP 56) which requires a Master Plan approved by the Minister for Planning before development consent can be granted;
- Leichhardt Local Environmental Plan 2000 (the LEP); and
- The Heritage Act 1997 because the site is a State Heritage item.

The Callan Park Act establishes clear objectives and boundaries for a new Master Plan in 2010. However, in reviewing the relevant legislation, we have identified two key questions that require answering early in the Master Plan process:

What does "not-for-profit" mean? The term is not defined in the Callan Park Act. One interpretation suggests that facilities on site should be operated by not-for-profit entities. However the wording of the Callan Park Act applies the test to the service provided by the facility Callan Park Act 7(9) '...facility providing services to the community on a not-for-profit basis'

Do the provisions of the Environmental Planning and Assessment Act 1979 (Sect 107 & 108) which allow for the continuance of an existing use, apply to Callan Park?

Without specific legal advice addressing these questions, the Master Plan cannot identify the full range of appropriate land users under the Callan Park Act.

DISCUSSION OF THE CALLAN PARK ACT

The legislative framework that applies to Callan Park is unique in that there is a specific Act to control the use and management of the site. The Callan Park (Special Provisions) Act 2002 ('the Callan Park Act') was assented to on 24 December 2002.

The Callan Park Act has the following objects:

- (a) *to ensure that the whole of Callan Park remains in public ownership and subject to public control, and*
- (b) *to ensure the preservation of the areas of open space at Callan Park that were in existence immediately before the commencement of this Act, and that extend to and include the foreshore of Iron Cove on the Parramatta River, and*
- (c) *to allow public access to that open space, including that foreshore, for public recreational purposes of both an active and a passive nature, and*
- (d) *to preserve the heritage significance of Callan Park, including its historic buildings, gardens and other landscape features, and*
- (e) *to impose appropriate controls on the future development of Callan Park."*

The Callan Park Act sets out to achieve these objects by:

1. Describing exactly how Callan Park, and parts of it, can be transferred, or leased.
2. Limiting the leasing or licencing of buildings and land in Callan Park to terms of 10 years, unless both houses of the NSW Parliament have allowed terms of longer than 10 years or those leases or licences pre-date the Callan Park Act.
3. Describing exactly what types of uses are permitted in leases, licences and new development at Callan Park.
4. Limiting the management and care of Callan Park to the council of the local government area in which Callan Park is situated (Leichhardt Council) or a trust prescribed under the Regulations (which are subordinate legislation associated with Acts of Parliament).
5. Making Leichhardt Council the consent authority for development at Callan Park.
6. Restricting development at Callan Park to health, education facilities providing 'not-for-profit' services and community facilities providing 'not-for-profit' services.
7. Prohibiting retirement villages.
8. Limiting development to within the footprint and envelope² of buildings that existed in 2002.
9. Prohibiting an increase in the total floor area of buildings.
10. Prohibiting a decrease in the total area of open space at Callan Park.
11. Specifically noting that the Heritage Act 1977 applies to Callan Park.
12. Protecting Broughton Hall Garden, Charles More Garden and Kirkbride Garden from the 'adverse effects' of the new development.

These provisions establish clear objectives and boundaries for a new Master Plan in 2010.

² 'Footprint' and 'envelope' are specialized planning terms. In the simplest sense, 'footprint' means the shape of the building at its base on the ground, and 'envelope' means the three dimensional shape that a building occupies. Planning instruments will offer more detailed explanations of these terms.

DISCUSSION OF OTHER RELEVANT LEGISLATION

Clause 7(1) of the Callan Park Act states that the provisions of environmental planning instruments that apply to the site are those that applied on 24 December 2002. Environmental planning instruments include State Environmental Planning Policies (SEPP's), Regional Environmental Plans (REP's) and Local Environmental Plans (LEP's). At 24 December 2002, numerous environmental planning instruments applied. Those with the most significance for Callan Park are:

- State Environmental Planning Policy No 56 - Sydney Harbour Foreshores and Tributaries (SEPP 56) which determines that the site is of State significance and requires the approval of a Master Plan before any significant development can proceed;
- Sydney Regional Environmental Plan No 22 – Parramatta River (SREP 22) which designates the Rozelle Hospital Site as a conservation area and within this area identifies 2 specific heritage items – Callan Park House and a European Rock Carving (adjacent to the foreshore); and
- Leichhardt Local Environmental Plan 2000 (the LEP) which zones the land “Public Purpose” and provides planning controls and objectives that reflect the local context. The LEP also includes heritage provisions that are particular to Callan Park

Therefore any Master Plan must be prepared within a detailed framework representing the interests of both State and local levels of government. Clause 19 of SEPP 56 notes that a Master Plan should address the following matters:

- (a) *design principles drawn from an analysis of the site and its context,*
- (b) *phasing of development,*
- (c) *distribution of land uses including foreshore public access and open space,*
- (d) *pedestrian, cycle and road access and circulation networks,*
- (e) *parking provision,*
- (f) *subdivision pattern,*
- (g) *infrastructure provision,*
- (h) *building envelopes and built form controls,*
- (i) *heritage conservation, implementing the guidelines set out in any applicable conservation policy, and protection of archaeological relics,*
- (j) *remediation of the site,*
- (k) *provision of public facilities,*
- (l) *provision of open space, its function and landscaping,*
- (m) *the impact on any adjoining land that is reserved under the National Parks and Wildlife Act 1974.*

Under SEPP 56 the Minister for Planning must adopt a Master Plan before any development consent for development on the site can be granted.

The Callan Park Act confirms the application of the Heritage Act to Callan Park. In summary the relevant provisions are:

- Under Part 3B of the Heritage Act, the Minister may enter into a heritage agreement for items that are listed on the State Heritage Register (including those at Callan Park). Such an agreement can include provisions relating to:
 - (a) the conservation of the item,

- (b) the financial, technical or other professional advice or assistance required for the conservation of the item,
- (c) the review of the valuation of the item or the land on which it is situated,
- (d) the restriction on the use of the item or the land on which it is situated,
- (e) requirements for the carrying out of specified works or works of a specified kind,
- (f) the standards in accordance with which the works are to be carried out,
- (g) the restriction on the kind of works that may be carried out,
- (h) the exemption of specified activities or activities of a specified kind from Part 4 (Effect of interim heritage orders and listing on State Heritage Register),
- (i) the repayment of money advanced or loaned by the Minister under section 45 (Financial and other assistance),
- (j) the public appreciation of the State heritage significance of the item,
- (k) the availability of the item for public inspection,
- (l) the charges made for admission,
- (m) such other matters as the Minister considers, on the advice of the Heritage Council, will assist in the conservation of the item,
- (n) such other matters as may be prescribed by the regulations.

It may be that Part 3B of the Heritage Act allows a relevant item to be used for a purpose that would otherwise be prohibited by the Callan Park Act. This issue needs clarification.

- A Development Application for doing any of the following things to the items at Callan Park that are listed on the State Heritage Register, will be integrated development under the EP&A Act and as such approval is needed from the Heritage Council of NSW before a consent can be granted.
 - (a) demolish the building or work,
 - (b) damage or despoil the place, precinct or land, or any part of the place, precinct or land,
 - (c) move, damage or destroy the relic or moveable object,
 - (d) excavate any land for the purpose of exposing or moving the relic,
 - (e) carry out any development in relation to the land on which the building, work or relic is situated, the land that comprises the place, or land within the precinct,
 - (f) alter the building, work, relic or moveable object,
 - (g) display any notice or advertisement on the place, building, work, relic, moveable object or land, or in the precinct,
 - (h) damage or destroy any tree or other vegetation on or remove any tree or other vegetation from the place, precinct or land.

There are exceptions to this as detailed in guidelines published by the Heritage Council of NSW.

SREP 22 provides incentives for heritage conservation which include the ability to use the buildings and land for any purpose. This issue is discussed in greater detail later in this paper.

The Callan Park Act uniquely limits land use and the application of environmental planning instruments, overriding certain provisions of the Environmental Planning and Assessment Act 1979 (EP&A Act). However, where The Callan Park Act is silent on certain issues, such as ecologically sustainable development, it is assumed that the EP&A Act applies.

PERMISSIBLE LAND USES IN CALLAN PARK

For a land use to be permitted in Callan Park it must be permissible under the relevant legislation. The relevant legislation is the Callan Park Act and the environmental planning instruments that applied on 24 December 2002. The only possible exception may be in relation to any lawful existing use at Callan Park which is no longer permitted under the relevant legislation. Under the Environmental Planning and Assessment Act 1979, 'existing uses' are permitted to continue and, subject to development consent, changed or expanded. However whether this is the case needs to be confirmed.

Leichhardt LEP

Callan Park is zoned for 'Public Purpose' under Leichhardt LEP. The objectives of this zone are: *" to facilitate the equitable provision and improve the range, quality and distribution of community and cultural facilities and services to meet the needs of residents, workers and visitors."*

Clause 28 of the LEP contains the development control table for this zone, detailing development that is permitted without development consent and development that is permitted with development consent. All other development not listed is prohibited.

Clause 16 of the LEP contains provisions relating to heritage conservation. Under these provisions an identified heritage item may be used for any purpose subject to development consent and consideration of certain matters.

SREP 22 – Parramatta River

SREP 22 designates the Rozelle Hospital site as a conservation area. Under Clause 27 of SREP 22, any building within a conservation area (or the land on which that building is located) may be used for any purpose subject to consideration of certain matters.

Callan Park Act

Under the Callan Park Act the only land uses that are permitted with development consent are health, community and education facilities. Retirement villages are specifically prohibited. There is a further requirement that community or education facilities must provide services on a 'not-for-profit basis'. This requirement does not apply to health facilities.

Despite the heritage provisions of the Leichhardt LEP and SREP 22 which potentially allow the site to be used for any purpose, the provisions of the Callan Park Act would override these provisions. However, it may be the case that the Heritage Act (by way of a heritage agreement) can allow a use which is not permitted under the Callan Park Act. Ideally this question will be resolved by additional independent legal advice.

The Callan Park Act does not make any provision for development to occur without development consent.

This table provides a summary of potential land uses on the site, having regard to the zoning provisions of the LEP and Callan Park Act.

Permissible under Leichhardt LEP 2000 Public Purpose Zone	Permissible under Callan Park Act	Permissible use under both instruments
Advertisements	Only if ancillary to health, educational or community facilities	Yes
boarding houses <i>Boarding house means a building that is let in lodgings and which primarily provides lodgers with a principal place of residence for three months or more and generally has shared facilities such as a communal bathroom, kitchen or laundry and has rooms with one or more lodgers. It does not include a backpacker hostel, serviced apartments, a motel, private hotel or a building elsewhere defined in this Schedule.</i>	Yes if it provides a not for profit community service such as a community boarding home.	Yes
car parking	Only if ancillary to health facilities, educational or community facilities	Yes
child care facilities <i>Child care facility means a building or place used for the purpose of supervising or caring for children (such as a service of the kind provided at centres for long day care, child minding, pre-school or occasional care, or a multi-purpose child care or neighbourhood centre) which:</i> <i>(a) caters for 6 or more children up to 12 years old, and</i> <i>(b) may include an educational function, and</i> <i>(c) may be used for the hourly care of infants to enable their carer to participate in short-term activities, and</i> <i>(d) may operate for the purpose of gain, and</i> <i>(e) is not home based, but does not include home based child care.</i>	Yes if it provides a not for profit community service	Yes

Permissible under Leichhardt LEP 2000 Public Purpose Zone	Permissible under Callan Park Act	Permissible use under both instruments
clubs <i>Club means a building used by persons associated, or by a body incorporated, for social, literary, political, sporting, athletic or other lawful purposes whether of the same or a different kind and whether or not the whole or a part of the building is the premises of a club registered under the Registered Clubs Act 1976.</i>	Yes if it provides a not for profit community service	Yes
community facilities <i>Community facility means a building or place which may provide for the physical, social, cultural or intellectual development or welfare of the local community and may comprise or relate to any one or more of the following: (a) a public library, (b) public health services, (c) rest rooms, (d) meeting rooms, (e) indoor recreation, (f) child minding, (g) a youth facility, (h) any other like place or use, but does not include a building or place elsewhere defined in this Schedule.</i>	Yes if it provides a not for profit community service	Yes
community gardens	Yes if it provides a not for profit community service	Yes
depots	Yes if it provides a not for profit community service or is if ancillary to health facilities or educational facilities	Yes
educational establishments <i>Educational establishment means a building, or buildings, used as a school, college, technical college, TAFE establishment, academy, lecture hall, gallery or museum, but does not include a building used wholly or principally as a child care facility</i>	Yes but only a university or any other facility providing educational services on a not-for-profit basis, but does not include a secondary school or a primary school.	Yes

Permissible under Leichhardt LEP 2000 Public Purpose Zone	Permissible under Callan Park Act	Permissible use under both instruments
<p>hospitals</p> <p>Hospital means a building or place used for the purpose of providing professional health care services (such as preventative or convalescent care, diagnosis, medical or surgical treatment, care for people with developmental disabilities, psychiatric care or counselling and services provided by health care professionals), and includes:</p> <p>(a) ancillary facilities for the accommodation of nurses or other health care workers, ancillary shops or refreshment rooms and ancillary accommodation for persons receiving health care or for their visitors,</p> <p>(b) facilities situated in the building or at the place and used for educational or research purposes, whether or not they are used only by hospital staff or health care workers, and whether or not any such use is a commercial use,</p> <p>(c) a medical centre,</p> <p>(d) a health clinic,</p> <p>(e) any such building or place within a corrective or reformatory establishment,</p> <p>(f) a nursing home,</p> <p>(g) a special needs home.</p> <p>Note – as noted above this definition includes wide range of health facilities</p>	<p>Yes as consistent with health facility definition. Note – does not have to be ‘not-for-profit’.</p>	<p>Yes</p>
<p>high impact telecommunication facilities</p>	<p>No unless ancillary to permitted use</p>	<p>Generally No</p>
<p>markets</p> <p>Markets means the use of land on a temporary basis for the purpose of selling goods or providing services, but does not include a land use elsewhere defined in this Schedule.</p>	<p>No unless community facility.</p> <p>The LLEP 2000 separately defines a market. It would be unlikely that a market could be run on a not for profit basis (unless directly associated with a not for profit community use).</p>	<p>Unlikely</p>

Permissible under Leichhardt LEP 2000 Public Purpose Zone	Permissible under Callan Park Act	Permissible use under both instruments
passenger transport terminals	Yes if it provides a not for profit community service	Yes
places of assembly Place of assembly means a building or place used for functions, conferences, theatre, cinema, concerts or dances or for any other similar use, and whether used for the purpose of gain or not, but does not include a place of public worship or an educational establishment.	Yes if it provides a not for profit community or education service or is part of a health facility	Yes
place of public worship	Yes if it provides a not for profit community service or is part of a health or education facility	Yes
police facilities	Yes if it provides a not for profit community service	Yes
public amenities	Yes if it provides a not for profit community service	Yes
public buildings Public building means a building used as offices or for administrative or other like purposes by the Crown, a statutory body, a council, Australia Post or an organisation established for public purposes.	Yes if it provides a not for profit community or education service or is a health facility (or part of one)	Yes
public transport stops	Yes if it provides a not for profit community service	Yes

LEP 2000 Clause 28 Public Purpose Zone	Permissible under Callan Park Act	Permissible use under both instruments
recreation facilities Recreation facility means a building or place used for indoor or outdoor recreation, or a table tennis centre, squash court, swimming pool, gymnasium, health studio or bowling alley, or any other building of a like character used for recreation, whether used for the purpose of gain or not, but does not include a place of assembly	Yes if it provides a not for profit community or education service or is a health facility. Many of the uses in the definition of a recreation facility could either be defined as a community facility or as a health facility. For example, a health studio or gym could be either. The major difference however is that a community facility must provide a service on a not for profit basis but there is no such restriction on a health facility.	Yes
transport depots	Yes if it provides a not for profit community service	Yes
water-based commercial and recreational facilities	No as it related to commercial use it is unlikely to qualify as a community facility	No
demolition	Yes if in relation to health facilities and educational or community facilities	Yes
subdivision	Yes in accordance with the requirements of SEPP 56 and only if ancillary to the use of the land for a permissible use.	Yes
roads	Yes if ancillary to facility providing a not for profit community or education service or a health facility	Yes

LEP 2000 Clause 28 Public Purpose Zone	Permissible under Callan Park Act	Permissible use under both instruments
<p>SEPP 5 housing</p> <p>SEPP 5 housing means housing described and provided for in <u>State Environmental Planning Policy No 5—Housing for Older People or People with a Disability</u>.</p>	<p>7(3) of The Callan Park Act specifically excludes ‘development for the purpose of retirement villages’. 7(4) of the Callan Park Act states that SEPP 5 does not apply to Callan Park. The objective of SEPP 5 is to ‘create opportunities for the development of housing that is located and designed in a manner particularly suited to those older people who are independent, mobile and active as well as those who are frailer, and other people with a disability regardless of their age’.</p> <p>Part 2 of SEPP 5 allows the development of housing for older people and people with a disability despite the provisions of any other environmental planning instrument. The Callan Park Act cancels out this provision that SEPP 5 should override other EPI’s.</p> <p>However, the Callan Park Act does not exclude all forms of SEPP 5 housing, which is defined as ‘residential accommodation which is or is intended to be used permanently as housing for the accommodation of older people or people with a disability which may consist of a residential care facility, a hostel or a grouping of 2 or more self-contained dwellings, or a combination of these, but does not include a hospital’.</p> <p>The fact that SEPP 5 is excluded does not necessarily mean that ‘SEPP 5 housing’ is not permitted as it is a permissible use under the LEP and does not rely on SEPP 5. Provided such housing provides a not-for-profit community service, it could potentially be permitted under the Callan Park Act.</p>	<p>Yes</p>

Under the LEP, ‘recreation areas’ are permitted on the site without development consent.

Recreation area means:

(a) an area used for sporting activities or sporting facilities, or

(b) an area used to provide facilities for recreational activities which promote the physical, cultural or intellectual welfare of persons within the community, being facilities provided by:

(i) the Council, or

(ii) a body of persons associated for the purpose of the physical, cultural or intellectual welfare of persons within the community, but does not include a club, racecourse or a showground or other place elsewhere defined in this Schedule

As long as recreation facilities provide community or educational services on a not-for-profit basis or are part of a health facility they would be permitted under the Callan Park Act.

There are also a wide range of uses which may not be permitted in isolation but could be considered to be ancillary to a permissible use. For example, a restaurant or café that formed part of a permitted use (but not the predominant part) could be permissible.

This could also apply to infrastructure related to sustainability, e.g. example, tri-generation plants or solar panels. Alternatively, infrastructure related to sustainability could be considered to be a community facility as it relates to the 'welfare of the local community'.

In summary, the Callan Park Act potentially permits a wide range of land uses 'for the purpose of health facilities and educational or community facilities'.

We recommend that Council seek specific additional independent legal advice to confirm this statutory planning interpretation.

IMPLICATIONS OF LEGISLATION ON MASTER PLAN

Any Master Plan must be consistent with relevant legislation. Where there are inconsistencies in the legislation, the dominant legislation, in this case the Callan Park Act, takes precedence. This is particularly the case with land use. Whilst there are some peripheral questions that require investigation, the Callan Park Act nominates the desired use of the land as:

- health facilities;
- education facilities (providing services on a not-for-profit basis); and
- community facilities (providing services on a not-for-profit basis).

The objectives of the Callan Park Act and its specific requirements to retain open space indicate that the provision of open space and its use, is a key use of the site that would come under the umbrella of 'community facilities'.

As well as land use, the other key aspects of the Callan Park Act relate to:

- public ownership and management;
- heritage conservation.

The only issue of great significance that is not dealt with in the Callan Park Act is sustainability. Encouraging ecologically sustainable development is an object of the EP&A Act which also needs to be embraced in any Master Plan for Callan Park.

Taken together, these implications form the basis for creating a clear vision for Callan Park, and for preparing a Master Plan designed to achieve that vision.

ISSUES REQUIRING CLARIFICATION

This discussion paper has highlighted a number of issues that require further clarification. We recommend seeking expert, independent legal advice on the following questions:

- What does “not-for-profit” mean? Council’s earlier legal advice indicates that this test relates to the specific facility on the site. However the wording of the Callan Park Act applies the test to the service provided by the facility. It is considered that a community or education facility that provides a ‘service’ on a not-for-profit basis is permissible. The consideration of whether a ‘service’ was not for profit would logically apply to the broader operation of an organization. Such organizations typically operate in more than one location and provide other services. For example a ‘Salvos’ second hand good store provides a community service of selling affordable and pre-used goods. Whilst an individual store may make a profit, the ‘service’ is provided on a not-for-profit basis.
- Another example would be a sporting club that is granted a lease for an oval with an ancillary kiosk/café. It may be the case that the kiosk returns a profit that is used to supplement other sources of income of the club. However, assuming that like most sporting clubs, the subject club operated on a ‘not-for-profit’ basis, the ‘service’ provided by the sporting (community) facility could therefore be considered to be a ‘not-for-profit’ service. These examples of the Salvos store, and the sporting club kiosk/café, are considered uses that are consistent with the Callan Park Act.
- Can a heritage agreement under the Heritage Act permit a use which would not otherwise be permitted, included uses not permitted by the Callan Park Act?
- The extent to which the Callan Park Act overrides the EP&A Act needs to be clarified. The Callan Park Act deals with certain matters which are normally covered by the EP&A Act (such as permitted uses) but is silent on other matters such as ‘existing use rights’, development permitted without development consent and sustainability;
- The Lyons advice included a number of questions that do not appear to have been answered. The permitted use table seeks to address these areas, but ideally Council will seek an independent, expert legal opinion to resolve all unanswered questions
- Any issues arising from the comments in the permissible uses table on pages 9 – 14 of this discussion paper;
- No information has been provided regarding any legal advice prepared by SHFA or any other authority that has been involved with the management of the site. We recommend that Council ask SHFA to make any such advice available.

BIBLIOGRAPHY

To inform this discussion paper, the following background documents were reviewed:

- Callan Park (Special Provisions) Act 2002
- Environmental Planning and Assessment Act 1979
- Heritage Act 1977
- Sydney Harbour Foreshores and Tributaries (SEPP 56)
- Sydney Regional Environmental Plan No 22 – Parramatta River (SREP 22)
- Leichhardt Local Environmental Plan 2000
- State Environmental Planning Policy No 5 – Housing for Older People or People with a Disability (SEPP 5)
- Callan Park Land Use Plan, prepared for SHFA (November 2007)
- Leichhardt Council submission on the SHFA Callan Park Land Use Plan
- legal advice prepared by Council's solicitor, Margaret Lyons on 9 June 2009