

SUBMISSION WITH REGARD TO
Brighton
INTERIM PLANNING SCHEME 2015
PROPERTIES IN THE VICINITY OF
CLARRIES LANE OLD BEACH



N M Creese
6th June 2019

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1. INTRODUCTION:

This submission is made in response to the recent implementation of the Brighton Interim Planning Scheme 2015 (BRIPS2015) – Brighton Draft Local Provisions Schedule. The scheme was published in the government gazette on 13th May 2015, being implemented as an interim planning scheme on 20th May 2015. The scheme zones the land in the vicinity of Clarries Lane (the site) as Rural.

The subject of this submission encompasses the land contained in Numbers 2, 4, 5, 6, 7, 8 Clarries Lane and Numbers 116, 124 & 128 Old Beach Road. It is the argument of this submission that the zoning applied to the subject properties, being Rural is incompatible with the capacity of the properties to carry out viable rural uses.

This is due to the following reasons;

- Proximity of the site to abutting zones (General Residential and Rural Living),
- Absence of access to a viable supply water for an irrigation source.
- Insufficient water catchment
- Limited lot sizes being too small to provide viable resource development enterprises.

Rural Living is considered an appropriate zoning for the site considering the ‘Limited Resource’ development opportunities. This includes the potential land use conflicts between any ‘Permitted Use’ of the site and residential land to the west, if the zoning is to remain ‘Rural’.

This report sets out to address the Zone Purpose Statements for Rural, Rural Living and General Residential Zones. Confirming the compliance of the delineated land use with the provisions of the Rural and Rural Living zones.



Image 1: The Site (List MAP image)

2. SITE CHARACTERISTICS:

The subject properties are located on dry grassed pastures between Clarries creek to the south and Bob's Creek to the north. The properties are under separate titles, property address and ownerships as detail in Table 1 below. For the purpose of this submission, the site is considered as a whole rather than individually to show capability of the properties, rather than the capacity of each title to support development independent of other properties.

Property Address	Title Reference	Registered Owner
2 Clarries Lane, Old Beach	C.T.141557/14	PS & SL Hoskinson
4 Clarries Lane, Old Beach	C.T.141557/13	BJ Richardson & SW Thompson
5 Clarries Lane, Old Beach	C.T.141557/15	PJ & DM Thirlwell
6 Clarries Lane, Old Beach	C.T.141557/12	GA &RH Auchterlonie
7 Clarries Lane, Old Beach	C.T.155009/9	DR & DL Gillie
8 Clarries Lane, Old Beach	C.T.141557/11	GW McGregor
116 Old Beach Road, Old Beach	C.T.240740/1	DJ Brumby
124 Old Beach Road, Old Beach	C.T.141814/8	RP Bradshaw
128 Old Beach Road, Old Beach	C.T.139107/7	DJ Gillie

The site comprises numbers 2,4,5,6 & 7 Clarries Lane as well as numbers 116,124 & 128 Old beach Road. Each contain dwellings and outbuildings in a 'Semi Rural' environment and associated development (including access driveways, garden and hardstand areas, sheds and other outdoor structures, and open space areas).

The vegetation across the site consists of dry grass pastures, several lucerne crops and scattered trees.

A single lot remains vacant being C.T.141557/11 (No 8 Clarries Lane). The site is currently zoned 'Rural Resource' under the Brighton Interim Planning Scheme 2015 and is subject to a number of overlays including Bushfire Prone Areas and Waterways & Coastal Protection Areas overlays.

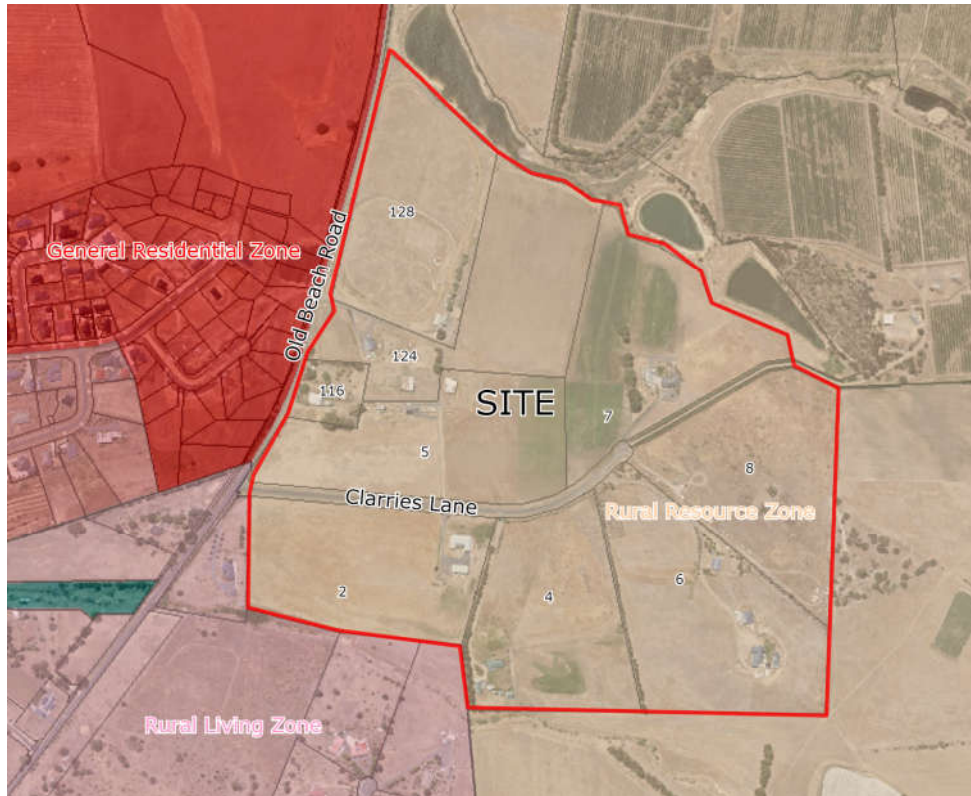


Image 2 The Site - Current Zoning (List MAP image)

To the north of the site is a mix of Rural and Rural Living Zones lot sizes ranging from 4000m² to 6ha and appear to use a mix of Rural Lifestyle and limited Rural enterprises.

To the east of the site is large scale farming consisting of a cherry orchard, grazing and cropping areas.

To the south of the site is an area of Agricultural Land, growing large areas of lucerne and other types of crops.

A significant area of Rural Living Land includes allotments of 5000m² upwards, typically including a single dwelling and outbuildings.

To the West of the site, Old Beach Road borders the site with newly developed General Residential land beyond. Three properties of between 3ha to 6ha are also located to the north west on the western side of Old Beach Road, which each contain a single dwelling and outbuildings, and are to be zoned Future Urban under the TPS.

3. PREVIOUS SITE DEVELOPMENT:

The site includes land forming part of a subdivision which was carried out in 2001 under SUB 01/05. The application was lodged in 2001 to subdivide the property known as "Compton" Old Beach Road, Old Beach, thus creating the properties at Clarries Lane and Harvest Lane.

The subject property was utilising the wastewater of the Green Point Wastewater Reuse Project prior to subdivision and was subject to a site management plan under this project.

Council minutes dated 13th June 2001 considered the application and reported the following:

The property was rezoned to Intensive Agriculture as defined by the Brighton Section 46 Planning Scheme No1 of 1992 on the 9th Sept 1999 following an amendment initiated by the Brighton Council.

The Planning Scheme Subdivision Standards for the Intensive Agriculture Zone:

5.4.3 Standards

a) minimum lot size 40ha except as provided in clause 10.4 and sub Clause (b) of 5.4.3

b) The Council may in accordance with the section 57 of the Act approve a lot of lesser size to provide a sustainable unit for intensive agriculture provided that the applicant can present sufficient

evidence to satisfy Council that such subdivision recognises the land capability of the site, demonstrates that the lot sizes, shape and location are adequate for the future use of the site, demonstrates that a sustainable agricultural use can be achieved (including water supply) and that the proposal will have no adverse effect on the continued operation of the land uses surrounding the site.

A minimum lot size of 5 hectares will apply. Each application shall be accompanied with a report from a qualified agricultural consultant or Department of Primary Industries, Water and Environment to the effect that the land capability can be achieved for the particular projected use together with any preferred management strategies.

c) Notwithstanding Schedule 2, the council may approve a cluster or community type subdivision based on whole farm practices and the requirements of Clause 5.4.3(b).

The Subdivision consists of 15 lots of between 5ha and 19.4ha (but generally 5-7hectares). The subdivision consists of two cul-de-sacs. The cul-de-sac on the northern side of the existing stormwater dam adjacent Old Beach Road provides access to lots 1,2,3,4,5 and 6. A second cul-de-sac located to the southern extremity of the property provides access to lots 9,10,11,12,13,14 and 15. Lots 8 and 9 have direct access to Old Beach Road.

There are Aurora Transmission and Hobart Water Authority Lines (and subsequent easements) transecting the subject site. These are described on the proposal plan.

The application is supported by an agricultural report which was authored by Mr Daniel Sprod of Ecosynthesis. A copy of the report is attached to this agenda, although the following extracts are provided.

- The range of potential crops depends partly on the source of water.*
- Wastewater sourced from the Green Point Wastewater Treatment facility consistently complies with 'Class B' recycled water. Guidelines for use state that it may be used in*

agriculture for a range of crops, where there is no direct contact with food that may be eaten raw. Thus restrictions include:

- *Separation of edible product from contact with water by irrigation technology (eg trickle, drip), by processing or peeling.*
- *Water monitoring (presumably carried out by council),*
- *Soils monitoring for excess nutrients, salts or increasing sodicity and*
- *Preventing spray drift beyond the edges of the irrigation area.*
- *Barwick has an agreement with Council to receive and use 200ML over the entire property and has a 60ML dedicated wastewater storage (one dam built and marked 6w2 in Figure 1, and another to be built soon, marked 6w3). There is no requirement to use this water on any or all of the lots, but it is assumed that it would be available for use for negotiation of a 'heads of agreement'.*
- *Hobart Water has a pipeline crossing the SW part of Compton and a dedicated "clean water" 68 ML storage dam (marked 6w1 in Figure 1). Presently Hobart Water can supply 'off- peak' water into storages for about \$200/ML The DPIWE has indicated that this dam should normally fill up each winter with run off.*
- *To enable access to these dams, the proponent is setting up a private water scheme that will allow each lot access to the dams and rights to agreed volumes of water storage.*
- *Availability of both 'clean' and recycled water potentially allows a lower cost than the \$200/ML, whilst enabling leaching of any harmful soils build-up. It also allows selective use of a (low level) nutrient rich water at particular times in the crop cycle.*
- *An exhaustive list of potential crops is not possible, but the following is an indicative list that would be suitable to the range of land capability and local climate:*
 - *Glasshouse (tomato, cucumber, flowers , herbs, nursery, etc).*
 - *Market garden (salad greens, flowers and bulbs, seed production, organics, nursery, community gardens etc).*
 - *Broadacre irrigated production (vegetables, poppies, hemp etc).*
 - *Perennial horticulture (grapes, cherries, apricots, olives, apples, walnuts, hazels, truffles, etc).*
- *Some of these crops are better suited to the area than others, and all will have particular restrictions. For instance,*
 - *Glasshouse production would be best sited on flat land to reduce costs of construction.*
 - *Market gardens for direct human consumption (greens etc) may not use recycled water.*
 - *Organic producers would need to establish that recycled water meets the standards of their relevant accrediting body.*
 - *Seed production of self pollinating crops normally requires a 2 km radius free of the same crops, cross pollinating require a 5 km radius.*
 - *Broadacre and perennial production would need to be of viable scale.*
 - *Contracts for walnuts produced with Websters requires that there is sufficient area planted in the region to viably support the harvesting contractor.*
- *The ridge south of Bobs Creek has areas of better soils : black basalt soils, brown alluvial soils and a brown 'terrace' fine sandy loam.*
- *Several lots with the better soils and easier slopes are considered suited to intensive irrigated agriculture without further discussion: lots 7, 8, 9, 11, 12, 13, 14 and 15.*
- *The shape of a lot, and the practicality of establishing and operating enterprises may*

reduce its ease of use for intensive agriculture, but there are no lots where this applies.

Summary of appropriateness of lots

- *Lots 7, 8, 9, 13, 14, and 15 are suited to development for intensive irrigated agriculture, even where the water resource is waste water. The full range of intensive agricultural pursuits are considered possible.*
- *The remaining lots: 1, 2, 3, 4, 5, 6, 10, 11, and 12 are moderately suited to development for intensive irrigated agriculture, even where the water resource is waste water: most intensive uses apart from broadacre cropping are feasible.*

Comment on previous development:

Although the Council minutes suggest that the lots are suitable for intensive agricultural uses (even where waste water is utilised for irrigation), the lack of a viable water supply, whether it be from waste-water sources or clean water supplies severely inhibits the viability of any rural resource activities on the site.

The water rights specifically required to ensure viability of the subdivision are no longer available with the heads of agreement between the developer (Mr Maurice Barwick) and the land owners not legally binding.

All existing properties possess no legal rights to access the water in the dams due to the absence of a waste water agreement.

Any previous water agreements have ceased, as Mr Barwick is now deceased. Mr Barwick had full responsibility and management for all the individual land owners water supply, hence private agreements with each owner.

The current owner of the dams utilises all water available in the large scale farming practice which is currently being conducted on the property adjoining the dam sites.

This has resulted in no other property in Clarries Lane being able to access the water source for irrigation purposes.

Without access to water for irrigation to these the properties, the owners are not able to sustain a viable rural enterprise in the long term. This is particularly evident given the land size of the lots.

As outlined in the original subdivision application Council could approve Lots at a minimum lot size of 5ha where it was demonstrated that a sustainable agricultural use can be achieved (including viable water supply). The premise on which that approval was granted, being the use of the recycled water, no longer exists.

It is argued that the long term sustainability of the subdivision is questionable due to the water right being withdrawn and no other current access available.

4. AGRICULTURAL LAND MAPPING PROJECT

The Agricultural Land Mapping Project, May 2017 was prepared to assist with the identification of land suitable for inclusion within the Tasmanian Planning Scheme's Agriculture Zone. Part 2.2.6 identifies potential constraints on land for agricultural use based on high capital value, impact of isolation from other agricultural land and proximity of conflicting land use.

Three criteria are identified that potentially constrain agricultural use as follows:

Criteria 1: Is the title size a potential constraint for agricultural use?

Response: The site is made up of 9 titles with an average of 5ha, which is half of the minimum title area described in Figure 4 of The Agricultural Land Mapping Project as ES1-10ha for the identified Enterprise Suitability (ES) Cluster.

Criteria 2: Are there potential constraints for the title being used or amalgamated with adjoining agricultural land?

Response: The site has a high capital value per hectare as the titles that make up the site are individually owned and dwellings are constructed on 8 of the 9 titles.

Criteria 3: Is residential development potentially constraining agriculture land?

Response: 4 titles within the site adjoin the General Residential Zone to the west, 2 titles within the site adjoin the Rural Living Zone to the south, which identifies potential land use conflicts.

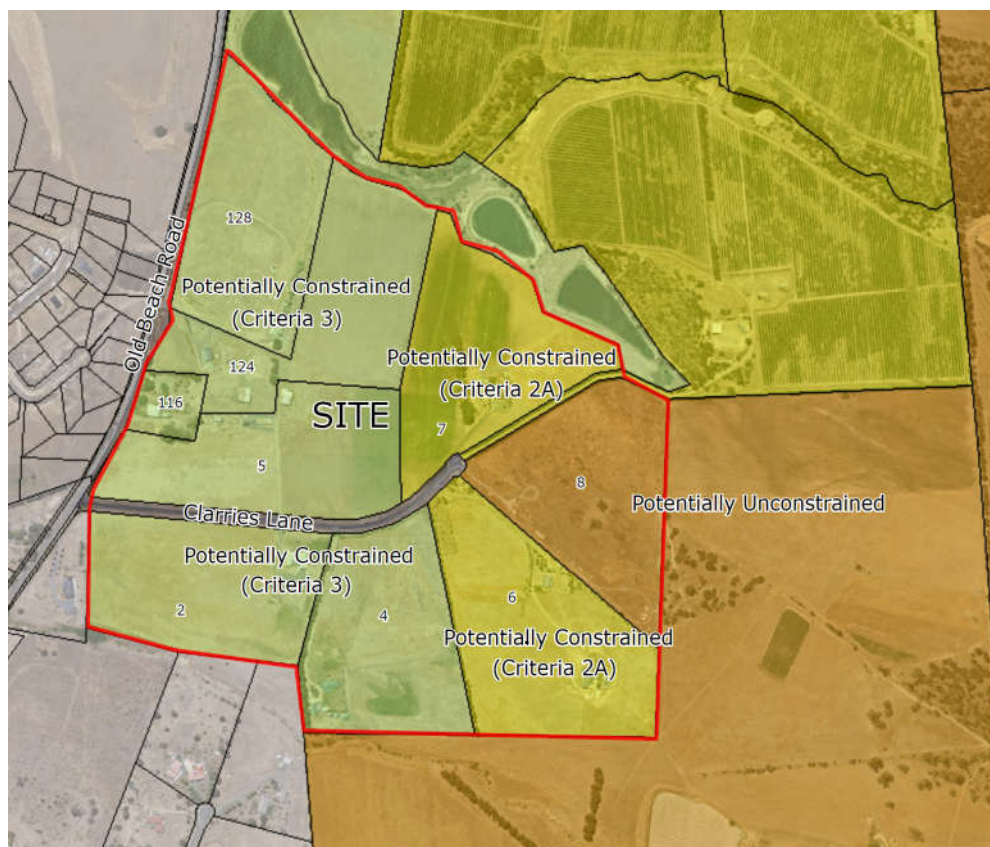


Image 3 Agricultural Overlay (ListMAP image)



Image 4: Planning Overlays (ListMAP image)

5. ZONING PROPOSED BY SPP & LPS:

The present zoning of the site under the interim scheme is Rural Resource. The proposed zoning under the SPP will translate to Rural.

The Zone Purpose Statements for the Rural Zone under Clause 20.1 of SPP state:

20.0 Rural Zone

20.1 Zone Purpose

The purpose of the Rural Zone is:

20.1.1 To provide for a range of use or development in a rural location:

(a) where agricultural use is limited or marginal due to topographical, environmental or other site or regional characteristics;

(b) that requires a rural location for operational reasons;

(c) is compatible with agricultural use if occurring on agricultural land;

(d) minimises adverse impacts on surrounding uses.

20.1.2 To minimise conversion of agricultural land for non-agricultural use.

20.1.3 To ensure that use or development is of a scale and intensity that is appropriate for a rural location and does not compromise the function of surrounding settlements.

Compatible uses within the Rural zone include:

20.2 Use Table

Use Class	Qualification
No Permit required	
Natural and Cultural Values Management	
Passive Recreation	
Resource Development	<i>use of land for propagating, cultivating or harvesting plants or for keeping and breeding of livestock or fishstock. If the land is so used, the use may include the handling, packing or storing of produce for dispatch to processors. Examples include agricultural use, aquaculture, controlled environment agriculture, crop production, horse stud, intensive animal husbandry, plantation forestry, forest operations, turf growing and marine farming shore facility.</i>
Utilities	<i>If for minor utilities.</i>
Permitted	
Business & professional service	<i>If for: (a) a veterinary centre; or (b) an agribusiness consultant or agricultural consultant.</i>
Business and Professional Services	<i>If for: (a) a veterinary centre; or (b) an agribusiness consultant or agricultural consultant.</i>
Domestic Animal Breeding, Boarding or Training	
Educational and Occasional Care	<i>If associated with Resource Development or Resource Processing.</i>
Emergency Services	

Comment on Zone Purpose Statement::

20.1.1 (a) Agricultural use is limited due to environmental constraints being the absence of a viable supply of water for irrigation purposes

(b) The site is adjacent to residential areas (Rural Living to the south and General Residential to the west) conflicting with the rural resource activities permitted on the site

(c) Permitted rural resource uses may be compatible with agricultural uses on the land to the east and south, however these do potentially conflict with the residential areas to the south and west as described in (b) above.

(d) The range of uses or resource development as specified in Use Table 20.2 will potentially cause significant adverse impacts on adjoining land to the west.

20.1.2 The land is marginal agricultural land with limitations due to lack of water, limited arable area and is arguably non-agricultural land in its current form and best suited to rural living. This argument is bolstered by reference to the *Brighton Structure Plan August 2018* which observes current use (at that time) as "used for rural living purposes".

20.1.3 The use of the land in accordance with the permitted uses described in Table 20.2 will necessitate high intensity practices in order to facilitate viability and as such will compromise the function of surrounding settlements, particularly the General Residential land to the west including overspray, odour and noise impacts.

Existing rural land use conflicts under Rural Zoning:

Should zoning remain Rural as proposed, significant land use conflict will exist between the site and land to the west.

Uses permitted or "no permit required" in this zone have the potential to be intrusive on the amenity of the residential land to the west due to a number of intensive agricultural uses possible for the sites.

Arguably, these uses will be necessitated due to the need to provide for viable rural resource activity, however will be severely limited through the lack of irrigation as discussed earlier.

6. ZONING PROPOSED BY THIS SUBMISSION

This submission argues the rezoning of the study area to Rural Living

The Zone Purpose Statements for the Rural Living under Clause 11.1 of SPP state:

11.0 Rural Living Zone

11.1 Zone Purpose

The purpose of the Rural Living Zone is:

11.1.1 To provide for residential use or development in a rural setting where:

(a) services are limited; or

(b) existing natural and landscape values are to be retained.

11.1.2 To provide for compatible agricultural use and development that does not adversely impact on residential amenity.

11.1.3 To provide for other use or development that does not cause an unreasonable loss of amenity, through noise, scale, intensity, traffic generation and movement, or other off site impacts.

11.1.4 To provide for Visitor Accommodation that is compatible with residential character.

Compatible uses within the Rural Living zone include:

11.2 Use Table

Use class	Qualification
No Permit required	
<i>Natural and Cultural Values Management</i>	
<i>Passive Recreation</i>	
<i>Residential</i>	<i>If for a single dwelling.</i>
<i>Resource Development</i>	<i>If for Grazing.</i>
<i>Utilities</i>	<i>If for minor utilities</i>
Permitted	
<i>Residential</i>	<i>If for a home-based business.</i>
<i>Visitor Accommodation</i>	
Discretionary	
<i>Business and Professional Services</i>	<i>If for a veterinary centre.</i>
<i>Community Meeting and Entertainment</i>	<i>If for a place of worship, art and craft centre or public hall.</i>
<i>Domestic Animal Breeding, Boarding or Training</i>	

Comment on Zone Purpose Statement::

11.1.1 The existing residential use and development is in a rural setting
(a) services are limited with only reticulated water supply, power and wireless nbn, available and on-site waste water disposal.

(b) existing natural and landscape values will be retained with single dwellings on larger allotments predominantly vegetated by pastures.

Most titles are currently used for residential purposes with rural resource uses limited to grazing as permitted Use Table 11.2.

11.1.2 The site will provide for compatible agricultural use and is currently utilised for limited grazing sheep and horses and does not adversely impact on residential amenity of the properties to the south and west due to their limited scale. These uses (and others are as specified in Use Table 11.2.

11.1.3 A range of other uses may occur within the site which do not cause unreasonable loss of amenity, through noise, scale, intensity, traffic generation and movement, or other off site impacts with rural resource uses limited to grazing and other low impact uses.

11.1.4 A range of accommodation uses are possible within the site including cottage accommodation, b & b, farm stay amongst others.

7. ZONE COMPATABILITY:

Local Provision Schedule Supporting Report:

Under the *Local Provision Schedule Supporting Report 18 March 2019* (LPS), guidelines are provided for the application of the Rural Living zoning under 1.3, *Settlement and Residential Development provisions* (SRD) in the following manner:

SRD1.3

Support the consolidation of existing settlements by restricting the application of the Rural Living Zone:

- 1. to existing rural living communities; or*
- 2. for the purposes of preparing a Local Provision Schedule, to land within an existing Environmental Living Zone in an interim planning scheme if consistent with the purpose of the Rural Living Zone.*

Land not currently zoned for rural living or environmental living communities may only be zoned for such use where one or more of the following applies:

a. Recognition of existing rural living communities, regardless of current zoning. Where not currently explicitly zoned for such use, existing communities may be rezoned to Rural Living provided:

- i. the area of the community is either substantial in size or adjoins a settlement and will not be required for any other settlement purpose; and*
- ii. only limited subdivision potential is created by rezoning.*

b. Replacing land currently zoned for rural living purposes but undeveloped and better suited for alternative purposes (such as intensive agriculture with other land better suited for rural living purposes, in accordance with the following:

- (i) the total area rezoned for rural living use does not exceed that which is back zoned to other use;*
- (ii) the land rezoned to rural living use is adjacent to an existing rural living community;*
- (iii) the land rezoned to rural living use is not designated as Significant Agriculture Land on Map 5 of this Strategy;*
- (iv) the land rezoned to rural living use is not adjacent to the Urban Growth Boundary for Greater Hobart or identified for future urban growth; and*
- (v) the management of risks and values on the land rezoned to rural living use is consistent with the policies in this Strategy.*

c. Rezoning areas that provide for the infill or consolidation of existing rural living communities, in accordance with the following:

- (i) the land must predominantly share common boundaries with:*
 - existing Rural Living zoned land; or*
 - rural living communities which comply with SRD 1.3(a);*
- (ii) the amount of land rezoned to rural living must not constitute a significant increase in the immediate locality;*
- (iii) development and use of the land for rural living purposes will not increase the potential for land use conflict with other uses;*

(iv) such areas are able to be integrated with the adjacent existing rural living area by connections for pedestrian and vehicular movement. If any new roads are possible, a structure plan will be required to show how the new area will integrate with the established Rural Living zoned area;

(v) the land rezoned to rural living use is not designated as Significant Agricultural Land on Map 5 of this Strategy;

(vi) the land rezoned to rural living use is not adjacent to the Urban Growth Boundary for Greater Hobart or identified for future urban growth; and

(vii) the management of risks and values on the land rezoned to rural living use is consistent with the policies in this Strategy.

Response to Local Provision Schedule Supporting Report:

1. The site is within an area already acknowledged as a rural living community under the *Brighton Structure Plan August 2018 (pp 53, Site 15)*.

2. No land is currently zone Environmental Living and this criteria does not apply.

a.i. the site extends across an area of 44 ha and is adjacent to an existing area of Rural Living zoned and to the south. The site is considered to be a "rural living community" under the *Brighton Structure Plan*.

a.ii. limited increase in subdivision potential results from this rezoning. Current lot number are 9, with a maximum of 30 total allotments (ie an increase of 21 lots) considering limitations such as non-developable areas, location of current buildings and other development on the lots, boundary setback requirement and limitations resulting from lot dimension.

b. Not applicable as this site is not replacing an area being back zoned.

c.(i) the site share a common boundary with the Rural Living zoned land to the south.

c(ii) 220 hectares of Rural Living land is currently located within a 2 km radius of the site with the area of the site being approximately 40 hectares, an increase in area of less than 20%.

c (iii) The site is considered to be a "rural living community" under the Brighton Structure Plan. Further development of the site for rural living purposes will only eliminate the existing land use conflicts.

c (vi) no integration is provided from rural living zone to the south, no new road construction required.

c (v) The site is not designated as Significant Agriculture Land on Map 5 of the Strategy.

c. (vi) Rezoning of the site furthers the polices of the report through the protection of agricultural land by minimising land use conflict with separation of agricultural use from residential use by this site.

c.(vii) Any risks associated with use of the rural living land is consistent with the policies contained within the report are minimised through reduction in land use conflict with greater separation between residential land and agricultural land.

8. DEVELOPMENT POTENTIAL:

With rezoning of the site to Rural Living, an increase in development potential will be limited to subdivision potential and hence total residential density. A reduction in development potential for rural resource uses will occur in line with the Use Table 11.2 which furthers the reduction of land use conflict with the land to the west.

The site is already acknowledged as a 'Rural Living' area with rezoning to Rural Living corresponding with its current "best fit" use.

Single houses occupy the properties within the site surrounded by areas of pasture with limited rural resource opportunities. The site currently comprises 9 allotments of approximately 5 hectares in area (a single lot of approximately 7000 m² also exists in the site), with development potential increasing to something in the order of 30 lots subject to constraints such as setbacks from the agricultural land to the east and south east, location of current development on the sites, topographic and lot configuration.

This is consistent with the potential development of the land to the south in Myna Park, currently of approximately 60 lots with potential for an additional 40 lots or so.

Each new lot would be limited to a single dwelling with a range of permitted or "no permit required" uses including accommodation (b&b or cottage style), rural resource (grazing) consistent with their proximity to the agricultural land to the east whilst minimising land use conflict with the land to the west.

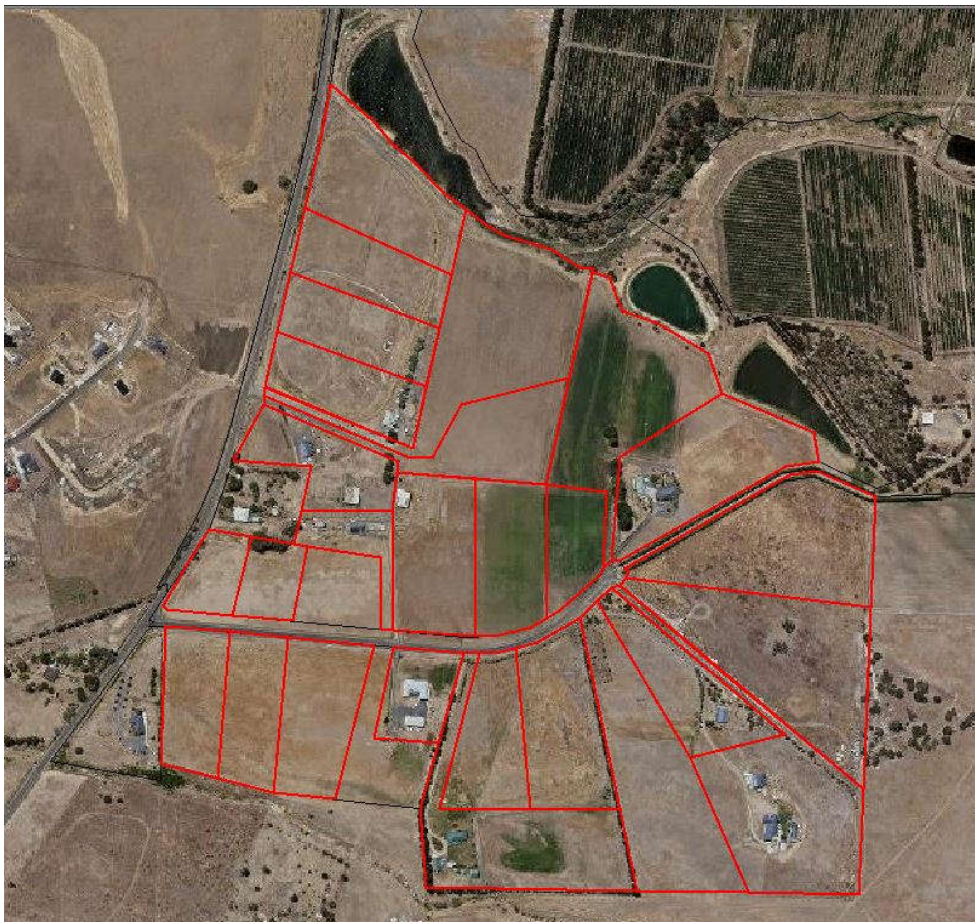


Image 5: Potential Subdivision Layout

9. CONCLUSION:

This submission identifies the capacity of the study area to support rural living style development and its suitability to the Rural Living zoning.

It is suggested that the location of the study area relative to the existing General Residential Zone to the west and Rural living Zone to the south, the proximity to Clarries Lane and Old Beach Road, road access, and capacity to connect to, stormwater and water infrastructure makes the study area ideally suited to rural living use and hence are compatible with and should be rezoned Rural Living.

The absence of a viable supply of water for irrigation and the limited size of the lots makes them unviable for any significant rural resource activity with their "best fit" use being rural living.

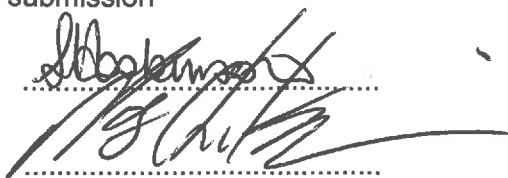
The development of additional rural living allotments within the site will not compromise the viability of the agricultural activities to the east and south east with appropriate setbacks from those uses and generous lot sizes.

Signatures of Title owners supporting the submission

2 Clarries Lane, Old Beach

C.T.141557/14

PS & SL Hoskinson



4 Clarries Lane, Old Beach

C.T.141557/13

BJ Richardson & SW Thompson

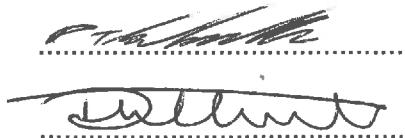
.....
.....

Wish to remain impartial
and stated they would not
object.

5 Clarries Lane, Old Beach

C.T.141557/15

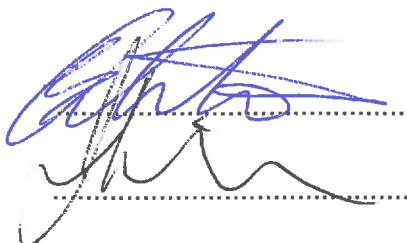
PJ & DM Thirlwell



6 Clarries Lane, Old Beach

C.T.141557/12

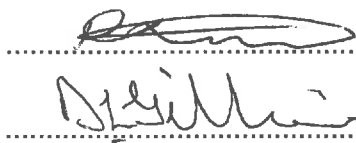
GA & RH Auchterlonie



7 Clarries Lane, Old Beach

C.T.155009/9

DR & DL Gillie



8 Clarries Lane, Old Beach

C.T.141557/11

GW McGregor

.....

Contacted in person was aware
of the deadline and remained
uncontactable by phone and text.

116 Old Beach Road, Old Beach

C.T.240740/1

DJ Brumby

.....

Unable to contact the owner

124 Old Beach Road, Old Beach

C.T.141814/8

RP Bradshaw



128 Old Beach Road, Old Beach

C.T.139107/7

DJ Gillie

