

Cover page

Representation/Submission

Re: West Coast Council Draft Local Provisions Schedule 2020

15th October 2020

To: West Coast Council

CC. Tasmanian Planning Commission

From: the writers of this representation:

Mr. Kim Lai

Ms. Jane Bennett

Mr. Aaron Chen

Mr. Greg Clark

Skyridge Pty Ltd

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Whose lands include around 90,000 m2 of vacant land [6 large individually rated properties] in the Tullah Village and the original Town Grant, formerly servicing 68 residences and Hydro Tasmania offices. I.e. approx. 20 to 25% of the land in the Tullah Village affected by these draft Provisions.

And whose businesses listed below also have a very strong active interest in developments in line with the stated vision of the town, and who, if proper and appropriate Provisions can be established are seeking to make significant investment in the town.

Lai-Bennett Partners
Greenbuild Tasmania Pty Ltd

And in 'general agreement' following discussions with Tullah landowners

Mr. Peter Hazelhurst
Mr. Steve de Villiers
Mr. Gavin de Villiers
Tullah Lakeside Lodge

Whose lands include over 50,000 m2 of the town's developed and vacant land under consideration for further development in three of the largest established properties and vacant land in the Tullah Village and original town grant.

All together these above properties comprise around 140,000m2 or around 30 to 35% of land and property in the Tullah Village area of the town.

And in 'general agreement' and following discussions with

The Tullah Progress Association
Mr. Jason Zammit [previous Tullah businessman and entrepreneur]

Whose contribution to the previous, current and future property development in Tullah is well known and ongoing in the present.

The entire above list agree that the draft provisions were produced without adequate consultation or explanation with them, are thus are now requiring a close and serious review before the Tasmanian Planning Commission approves the WCC Local Provisions Schedule as a properly suitable and conforming to state and regional policies, strategies and formalised vision statements.

See appendix 1. For a full list of properties owners PID and title folio info.

OVERVIEW:

Tullah is a unique town that has both historic importance as the base for the development of the Pieman Hydroelectric development, as well as unique natural features that provide great potential for development in a variety of ways and has led to it being noted in the councils own previous studies resulting in its promotion and branding as the 'Gateway to the West Coast' and as the 'People of the Lakes' with its wide range of historical values and abundant natural significance which if properly aligned with will provide Tullah many economic and developmental positives for the future.

Despite this tremendous potential to actualize its position in the West Coast Shire as the 'Gateway to the West Coast' and become a thriving community with a sound economic basis supporting it, it will most certainly not be able actualize this potential unless the West Coast Provisions align with both the stated policies of the shire and the regional strategies it has subscribed up to, as well a full compliance with state policies and objectives as we move towards a much needed statewide planning scheme.

Every town is not only its physical assets, but at least equally important are the creativity and dynamics of its residential and business community. Equally important as the preservation of its history intact, is its specific local vision based upon strong community interest and involvement in activating its future potentials, along with sound business modelling and planning working in alignment with such. These are factors that any shire should not ignore, misjudge or downplay due to lack of information. In fact, Tullah has suffered greatly in the past by what is locally viewed as inappropriate planning and actions, that resulted in the sale by council of many of its public lands and amenities to a private developer, that subsequently failed to achieve its objectives. This resulted in many years in which development of Tullah's potentials was in effect 'placed into the deep freeze' and for a period of around 15 years when all development came to a grinding halt when a very large area of the village, including much of the local business centre were tied up and not available for use or development due to bankruptcy proceedings, loss of titles and so forth. This situation has been remedied over the past decade largely by the slow return of these lands and properties into private ownership, reconstruction and upgrade of the businesses in the local business area with many owners having intent for significant future developments. If the current provisions are approved as currently proposed in these draft provisions, it is very strongly feared that it will overly and unnecessarily restrict and actually thwart the future development of the town. A town's important asset is its people.

This representation will cover

1. Specific issues related to proposed zoning of property owned by the authors of this representation, including
 - a. Rural zone concerns
 - b. Residential zone/s
 - c. Local Business zone
2. Comments and suggestions regarding the overall effect of zones in other areas of the town that may be improved by a reassessment as to suitability.
 - a. Rural zone
 - b. Residential zone/s
 - c. Local Business zone
 - d. Light Industrial zone
3. The importance of consultation with the community regarding the desire for local community to have greater involvement in the process in general, and its vision of Tullah and the actualization of its positive future direction. Within this also asking to be considered is the importance of giving adequate and due consideration [based upon accurate facts], to the current development planning of local businesses, that will if properly understood, enable Tullah to achieve its potential of being the "Gateway to the West Coast".
4. Facts that have arisen this year that were not so clearly evident at the time this draft local provisions was produced. An example of these recent unfoldments has been the shortlisting of Tullah as one of three ideal sites for the Battery of the Nation project, the prioritizing of this by state and federal

governments and its inclusion in projects of national importance by Federal government, and the need for recovery from the impacts of Coronavirus on the economy. In short now is not the time to impose inappropriate restrictive zonings, contrary to the plans of businesses attempting to further develop Tullah in positive ways that do align with the broader regional strategies and policies. We believe that the draft LPS as presented in regard to Tullah neither properly nor fully aligns with several state and local policies and land use planning strategies, and request due consideration to the matters and facts raised in this representation.

It needs also to be stated here at the outset, that whilst some of this representation's content may misunderstood as 'pointing a finger of blame' at the council, this is in fact not so. We believe that the West Coast Shire, as perhaps other 'small in population but vast in area' shires, may have been limited by sheer volume of work overload on its staff, so that it has not been able to fully consider the many facts and points made in this representation.

SPECIFIC ISSUES AFFECTING ZONING OF PROPERTY OWNED BY THE AUTHORS OF THIS REPRESENTATION. please refer to Appendix 1.

1. Land inappropriately drafted to become the new Rural Zone land. The FACTS that appear to have NOT been given due consideration and accurate checking in proposing in this draft LPS that this land to be most suited to the new Rural zone criteria are:-
 - a. This area of land can be defined as all land within the town south of Selina St. and Bluff St. proposed to be rezoned to Rural. A significant part of the township required for the actualization of its vision and local strategies as the 'Gateway to the West Coast' and development as a tourism centre.
 - b. This area has existing infrastructure that previously serviced 90 residences.
 - i. NB historically the removal of these residences sparked the intense protests against the destruction of this town at the end of the Pieman Scheme hydro era, and resulted in the formal adoption of Tullah as a permanent town.
 - ii. Is included in the original Town Grant, and is not out lying on the perimeter of serviced township land. It is township residential land, not just by future projection but by actual historical fact.
 - c. The area to be rezoned here comprises over 120,000 m² of the town, of which approx. 80,000m² is owned the authors of this representation, and 10,000m² by owners in strong agreement that a Rural zone is inappropriate. The last remaining owner has not been contactable in the time frame for preparation of this representation.
 - d. This area has EXTENSIVE EXISTING INFRASTRUCTURE comprising
 - i. A network of 1100 metres of sealed roads with kerb, channel and stormwater drainage.
 - ii. The property ID 7788451 [2 Romulus St] has itself 600 metres of a road network kerb channel and stormwater drainage within its boundaries.
 - iii. Has existing vehicular crossovers to these previous residences
 - iv. Has a Taswater connected reticulated sewerage system recently upgraded with a new Sewerage Transfer Pump Station that serves no other purpose than the service of this land, and not installed to support of any type of Rural zone activity.
 - v. Has a network of pressurized town water mains water directly from the adjacent town water treatment plant. This includes a notable network of fire hydrants.
 - vi. Has a recently upgraded 100 kva 3 phase electrical supply, currently suitable for 15 residences and easily upgradable to 200 to 300 kva.
 - vii. Significant unmatched views to the main mountain ranges in this locale including Mt. Farrell and Mt. Murchison, as well as access to the lakefront.
2. This land is COMPLETELY UNSUITABLE FOR RURAL ZONE USES due to
 - a. This land was actually created for residential use by the removal of all topsoil and the packing of 1 to 2 metres of rock to create a suitable and stable base for buildings that were constructed there. It was considered a prime residential location in the town historically the choice place for managerial and senior hydro staff. As such no rural activity related to the use of land to produce anything can be undertaken here.
 - b. Many if not most of the permitted uses in the new Rural zone will not be possible here. For example:-

- i. Animal breeding and boarding kennels is a permitted use, but only IF it is conducted 200 metres distant to a residential zone. In this case much of this land cannot carry on those types of activities as it actually exists within a township right up to existing residences and cannot be distanced by a buffer area.
- ii. Specialised produce from the land being utilized to develop on farm 'paddock to gate and paddock to plate type' developments. The land simply cannot produce anything, and such approvals carry criteria of being linked to a resource or produce from the land.
- iii. Resource Development is permitted but is not possible as there are no resources in or under this land to be developed or extracted. Even if so it would be inappropriate for such activities to take place right next to existing residences in a residential zone.
- iv. Veterinary centre or agribusiness consultancy. Tullah does not have animal husbandry and agri business around it requiring such developments to service it. Simply no-one seeking these services will travel so far away from their farms to Tullah to seek such services.
- v. Other permitted use in the new Rural zone include food services, general retail and hire, manufacturing and processing, resource processing BUT only if associated with resource extraction from the land itself.
- vi. Use for a single residential use or visitor accommodation is similarly restricted to constraints largely related to products of the land, and use of existing buildings.
- vii. Every other possible use of the land, given the here presented accurate facts of the land as noted above, is a very limited Discretionary Use. As such any and all possible practical uses of this land will involve otherwise unnecessary lengthy, complicated and costly processes of application. In effect any use of the land will require trying to show that something OTHER than a use intended for Rural zoned land is correct. Given that these facts re the actual character of the land and existing infrastructure have been not given due consideration in proposing this zoning by council, such a zoning portends great difficulty and complexity for both council and developers in seeking due consideration for any proposed development at the discretion of a council that is likely to respond that the zone itself does not permit the development. Simply put, why complicate every single future planning development application by attempting to show in each instance that the zone uses are not possible and are thus inappropriate – leading to having to find a way to seek council's discretion as to uses not straight up and clearly suited to the zone.
- viii. If the land was modified structurally for example to be made use of for a more intensive animal husbandry development relying on produce/feed from outside for breeding rather than what can be produced on the land in this case, then it would pose a severe environmental threat to the lake, to which all the existing stormwater drainage system discharges runoff. The discharge of dissolved manure nutrients and perhaps agricultural chemicals to the lake would be absolutely disastrous. Consequently, these types of permitted use under the Rural zone would require the removal of such road and stormwater infrastructure at the very least and how any such design could prevent runoff to the lake would simply be unviable and no business would consider such a costly undertaking. This just goes to the point that this land would need to completely remake REMADE to enable such uses. This is plainly ridiculous in any reasonable person's eyes.
- ix. The council planners have been asked to explain why they now believe this land should be rezoned to Rural as perhaps they had some facts not evident to the writers, but no explanation has been forthcoming. This stands in strong contrast to the 2017

WCC Land Use Study where it was suggested this land be considered as one of the new Residential Zones.

- c. We strongly suggest that the Council and the Tasmanian Planning Commission enquire into these and other matters raised further on so that it ensures that a correct zone properly suited to this area of land and its existing infrastructure is established now in the process of arriving at an effective Statewide Planning Scheme. This takes some time to consider however it saves a great deal more effort and hours of attention to save everyone from future complications, delays and complexities due to an inappropriate zoning being approved now. In particular, regarding the plans of the authors of this representation for developments on their land, an inappropriate ill-considered zoning may even be the last straw and incline us to seek to invest elsewhere rather than in Tullah merely due to the unnecessarily high level of complication and unsuitability of the zone to this land. In regard to this we did seek to invest in Tullah in a tourism and housing project in 2019, but due to complexities in the shires interim scheme we moved those significant amount of funds and our attention to a project in Wynyard shire.
- d. In short, this land is wholly unsuited to Rural Zone uses and the actual effect of such zoning will merely mean that this land is completely removed from the township and future of Tullah. The town of Tullah is small enough as it is and to it is also far more costly to develop land with service infrastructure in the west coast towns therefore it is simply extremely wasteful to disregard these extensive existing services and to not make use of them, at the same time proposing this exact same infrastructure be installed elsewhere in the town so that land can become residential.

3. This land is MOST SUITED TO A RESIDENTIAL ZONE due to these facts:-

- a. The land has already existing infrastructure as described above suitable to service up to 90 residences. At today's prices to service an equal amount of land at even the lower North Coast rate of around \$45,000 per lot would be an abject and negligent waste of millions of dollars of existing infrastructure. This representation seeks to know why such a waste of resources is the correct way forward by zoning this area residential.
- b. Despite the fact that in general overall population in the West Coast Shire is in decline and fluctuates greatly due to the viability of mining industry activities affected by global markets for example., it is a great mistake to consider Tullah as having to experience such population decline. This fact was properly noted in the 2017 Land Use Study where it correctly states that of all the West Coast towns Tullah has the highest potential for population growth due to its closer proximity to the North Coast cities. However, this also needs to have added an awareness of business interest in the promotion of Tullah as an ideal place to live and as a place to have a healthy retirement home or for those of the younger generation as a place for an affordable vacation home. In regard to this we would like these facts to also be considered:-
 - i. We have undertaken our own industry research into the factors affecting residential land uptake in Tullah via the normal means of maintaining updated contacts with real estate agents' and their direct experiences, market testing and such. From this it has become clear that there is a real demand for uptake of residential land in Tullah, IF two factors acting as dampeners were to be properly addressed. These factors are:-
 - 1. 'Demand for country allotments increases with lot size.' Tullah's existing residences are on lots of around 500 to 550m² and most persons seeking a small town lifestyle change seek larger allotments as one of the main drivers of 'tree change' and retirement. Larger vacant lots when occasionally available for sale sell quite quickly. Thus the land in question here can be easily made into residential lots of 1000 to 1500m². At the time of writing

there is not one single available residential lot for sale at Tullah, only an increasing demand. In such a situation to continue to accept as accurate data from several years ago that there are ample lots available for demand for the entire next decade is completely mistaken and factually incorrect if we look at Tullah in particular and not treat it as an average of the whole shire. We are planning and trying to make available exactly these larger residential lots on some of our land in Tullah. For example the 10,000 m² of vacant serviced land between Sterling and Romulus Street could very viably provide 9 lots of over 1000m² each. This is due to existing infrastructure.

2. ‘ The high cost of construction in West Coast towns.’ This is a factor arising from distance from larger regional centres, the housing shortage crisis throughout the state, and severe lack of registered builders in the shire. To address this factor we have contracted to purchase a large industrial site and to construct a ‘state of the art’ affordable constructions facility at Wynyard for relocation of our machinery from Melbourne along with new machinery as well. Our computer controlled automated steel fabrication machinery will significantly reduce the cost of prefabricated housing, and provide a wide range of innovative affordable housing solutions. [Our investment in this project is several million so far.] Such an approach will enable towns like Tullah to develop far more than expected by just looking at past vacant land take up and construction activity in the shire in general.
- c. We have spent two years bringing investors from Australia and overseas to Tullah for a significant tourism project which will require the construction of a suitable visitor accommodation facility, most desirable on 10,000 m² of the 55,000m³ of our land south of Romulus Street that has lake frontage. Hydro Tasmania has expressed strong willingness to consider an application for a pontoon allowing direct access to the lake for minor watercraft and at this stage it is very promising as they unfortunately had to reject our application for houseboats to operate from this site, but stated a willingness to favorably consider the smaller pontoon. So far this has attracted a lot of investor interest, and at the date of the border closure due to Covid-19 restrictions we had strong interest from an Australian Tourism company for a major investment of funds, as well as another from overseas. The residential zone is the most appropriate of zones that could be considered from a selection of zones being adopted in the West Coast Shire for such developments. The residential zone is more appropriate and correct for this type of development also in that the remaining 45,000m² of land with existing residential infrastructure will not be wasted but rather can be subdivided into appropriately sized allotments to meet the market demand.
 - d. Factors arising from recent events, i.e. before the 2017 Land Use Study was conducted, and even most recently in the time since the drafting of this LPS affect housing and accommodation demand in Tullah in significant ways. These events all strongly increase demand for residential developments of various types and should be catered for now based upon expectations now and the next decade. To say these residential zonings can be revisited in 2030 ignores the facts of the present. In fact, in recent times demand for housing has far outstripped Tullah’s capacity to supply with workers having to find accommodation in distant towns to Tullah.
 - i. Mining approvals and commencements. Venture minerals has two approved mines close to Tullah which will require accommodation for what news reports say the first mine now under construction will require up to 100 workers. We have seen over the past year a stronger demand on housing in nearby Zeehan due to the construction of the Granville harbor windfarm.
 - ii. Hydro Tasmania dam upgrades- now taking place has increased pressure for housing and accommodation at Tullah.

- iii. Covid 19 has forced both and federal governments to fast track projects as a part of our economic post Covid recovery. Of these the Battery of the Nation energy storage project has become listed as a project of national importance and Tullah is one of three sites shortlisted as where this major infrastructure development will take place. This is getting closer and closer as the months pass by and now is the time for it to be considered as a factor in making appropriate zones for Tullah, especially in regard to housing and accommodation. Without the clarity on appropriate zoning it became next to impossible for industry to plan and prepare for the influx of workers.
 - iv. A greater awareness among Tasmanians of Tullah and its relative closeness to the northern city of Burnie has identified Tullah as one choice for healthy retirement and vacation properties.
 - v. The evidence of this higher demand at Tullah now than at the time of the initial study informing the draft LPS is the near doubling of property prices at Tullah.
 - vi. As Tullah really is correctly recognized by council as the 'Gateway to the West Coast' and as having potential for unique tourism opportunities more and more people are becoming aware of Tullah and it is not at all the correct time to make around 25-30% of the town effectively unfit for any use by making it a rural zone in the middle of a small town. We have read the representation made by the Tullah Progress association and note therein that this association is strongly representative of the town's permanent residents, and they too agree that a residential zoning is appropriate for this land. Their reasons may be read within their own submission.
4. That idea presented that there is 'ample residential land available elsewhere in Tullah to meet demand' and the direction of residential growth should be in land zoned residential to the north of Farrell street does not take into account that to develop that land into residential allotments will require an excessive cost for the construction of a new road network with kerb and channel, stormwater drainage systems, new sewerage and water supply service layouts, and the cost of which would make such a project completely unviable by any residential developer. Anyone in that industry understands that it just won't happen. This fact is proven with the previous owner, Venture Minerals, who after having it assessed for suitability for development for workers accommodation decided it was unsuitable and on sold the land. The current owners of the land are most definitely not intending to do residential lot development in that area, and in fact are in the planning stages of expansion of their adjoining business activities at the Tullah Lakeside Lodge. Therefore, apart from this undeveloped land which has not and will not be developed as residential land there may be only a handful of vacant residential lots in Tullah, which at the time of writing none of which are for sale. As such there remains a need to ensure residential land supply, especially when suitable land is available except for zoning, with the owners willing and trying to make that land available. Similarly, another area of land on the corner of Farrell street and the Murchison highway is zoned residential. The writers here are the owner of that land and do not wish to develop it as residential, but rather in conjunction with their Business Zoned land adjoining it. See later section.
5. In summary of this section – The largish area of land that is listed for rezoning to the new Rural zone south of Selina and Bluff streets is an entirely incorrect category as it does not take properly and duly into account the huge value of the already existing infrastructure to be disregarded, nor the actual potential of the town to grow and develop, nor the negative social and development thwarting effects of land being placed into a zone that in effect make it completely useless, the steady movement of forces that point to Tullah as having a future even brighter than the general outlook for the shire as a whole, land proposed for residential use that cannot economically be developed as such and basically presents a complete disconnect between the shire's planning for the future and how zones can affect that most powerfully when a small town system is being considered.

6. LOCAL BUSINESS ZONE

- a. The proposal to create a Local Business Zone on Farrell Street is to be highly commended. Previously there was no business zoning in Tullah at all, and all local business and developers had to contend with a Planning Scheme that had land zoned residential that was obviously more suited and in actual uses more suited to a Local Business Zone, therefore in the view of the writers this is a step in the right direction.
- b. However, as private owners of land to be brought into the Local Business zone at 12 Farrell Street it is suggested that this go further given practicalities of the situation. 12 Farrell is a large developed car park and incorrectly is stated in the LPS to service the Community Hall and Sports Centre. As the private owners we have differing intentions regarding the development of that land, though are not averse to coming to arrangements for use of that car park and have given permission for its use for community events operated by and out of the Tullah Progress Association. However, it does need to be noted that this is privately owned land along with the adjoining corner which is part of a large residentially zoned allotment running along the Murchison highway. This land should be zoned Local Business so that this privately owned established car park can service commercial buildings on land joining it but in a separate zone. Therefore, we request that the northern part of the lot at 12 Farrell Street be also zoned Local Business.
- c. Further along Farrell street there are properties that are in fact used as part of existing local business activities and these should be considered as appropriate to the Local Business zone. In particular the land known as 40 Farrell Street and 37 Farrell Street and the previous Hydro Tasmania offices at 23 Farrell street, as well as the Fire Station. Also, in the northern section of the old town of Tullah there are established local businesses including a hotel, a coffee shop and a previous petrol station that would seem more appropriate to be included in the Business zone or another type of commercial zone. We support those land owners in regards to their representations desiring consideration so that their respective development plans which will not only provide local jobs but also add significantly to the town as a whole and bring other benefits to the community.

7. LIGHT INDUSTRIAL ZONE

- a. The 2017 Land use Study entertained allocating a small area near Hean street into Light Industrial. This would be a commendable action, however in the draft LPS no area has been included in the light industrial zone. Such a zoning would be very supportive of smaller industries such as construction and fabrication for the town.

8. SUMMARY

- a. Tullah is a unique town, presented with challenges but also with tremendous potentials to continue to actualize a very positive long term future for the town in the following areas.
 - i. Potential to both develop and integrate as an outstanding tourist destination
 - ii. Continuing support of the mining industry and its workers
 - iii. Continuing support to the Hydro community of workers
 - iv. Residences – a great place to live or holiday amongst the beauty of lakes forests and mountains becoming increasingly more attractive to those just discovering Tullah
 - v. Skilled, highly motivated and creative local business people who work well in generally co-operative values that work for the benefit of the town as well as their own businesses
 - vi. A community with a very passionate interest in its future development, as for example the Tullah Progress Association which has undertaken projects to support a locally formed vision for the town, many volunteer hours and gifted people contributing to their community in a manner that never ceases to inspire.

- vii. The town has suffered greatly in the past by council decisions to its detriment and has largely by its own efforts begun a re-building and re-invigoration of a new vision for a positive future.

It is of the utmost importance that these factors are taken into account in regard to how the new local provisions re zoning may become either supporting or thwarting factors in the town of Tullah in its efforts to continue to actualize its vision and tremendous potential.

We would also like to note that we have read the representation submitted by the Tullah Progress Association and support their views expressed to the fullest extent.

- b. The proposed new zonings in this draft LPS are well conceived in many parts, but in other areas they differ greatly from the 2017 Land Use Study. This has led to some confusion and distress in the community who expected that many of the 'in the right direction' proposals presented in the 2017 re zoning were in process of being incorporated into the draft LPS but now find it quite different to expectations in the publicly exhibited draft. In particular concern is inappropriate zonings regarding
 - i. A large part of the township being classified to the new Rural zone on land that has existing services and significant ready to use for residential infrastructure. This is in effect reducing the size of the town at a time when it needs to expand and develop and has business persons working towards those types of developments.
 - ii. The new Rural zone in an area where any of its permitted uses as rural land are significantly constrained by location next to existing residences and is land due to its man-made character is totally unsuited to any type of permitted rural activity in that zone.
 - iii. A local business zone that does not include properties that are actually being used for commercial purposes, or are ideally situated adjacent to land to be rezoned to Local Business.
 - iv. That zones should be introduced based upon as many actual facts as are available as to the nature of the land and the built property, as well as to the intentions of owners who have been trying to develop the land previously in zones not suited to the situation.
 - v. That the town community, its residents and business people often have a far more place and site sensitive appreciation of the correct and suitable land use. Especially so when this knowledge is in fact aligned with stated policies and land use strategy documents.
 - vi. A properly due and careful consideration of the views of property owners in Tullah will assist greatly in the future and development of this town's tremendous potentials. Getting the zonings correct will be a great boost for Tullah but equally so getting the zonings incorrect could well spell its demise.

Thank you for your time and attention.

Submitted 16th October 2020 via email.

Appendices and Attachments:

1. List of owners' properties PID Title Folio numbers
2. Maps from The List showing infrastructure and location of properties discussed
3. Photographs of existing infrastructure
4. Historical aerial photography showing actual historical use of the land
5. List of policy and strategic planning documents reviewed for this representation.
6. Estate agents reports on land demand for Tullah