

30 August 2022

Ms M Molinaro
Statutory Planner
Adelaide Hills Council
Lodgement via PlanSA

Dear Marie,

Response to representations – 24 hour retail fuel outlet with associated canopy, car cleaning & dog wash facilities, 70,000L underground fuel storage tank, pylon advertising sign, combined fence & retaining walls, retaining walls, car-parking & landscaping

We refer to Development Application 21031284 lodged with Council for a 'Retail Fuel Outlet, comprising a control building, car and dog washing facilities, fuel canopy, associated signage, fencing and retaining walls, car parking and landscaping'. The development site comprises land identified as 160 Longwood Drive, Heathfield.

Pursuant to section 107 of the *Planning Development and Infrastructure Act, 2016* (the 'Act'), the application was subject to public notification and 193 representations were received. This correspondence constitutes our formal response to the representations received.

1. Summary of representations

By way of summary:

- 193 separate responses were received from individual or joint respondents.
- 12 of the responses were in favour of approval of the proposed development (with suggestions in some cases for changes or refinement).
- 181 of the responses were opposed to approval of the proposed development.
- The following issues were raised (ranked by frequency of respondents raising them):
 - Traffic impacts of the proposed development – 99 respondents.
 - Noise impacts from 24 hour operation of the proposed development – 56 respondents.
 - The appropriateness or otherwise of the use of the subject land for the proposed development (land use) – 55 respondents.
 - Effects on biodiversity, potential pollution of nearby watercourses and air quality impacts of the proposed development – 53 respondents.
 - Light spill impacts of the proposed development – 44 respondents.
 - The visual or aesthetic impact of the proposed development (including its signage elements) – 28 respondents.

- Risk of Retail Fuel Outlet in a bushfire-prone area – 18 respondents.
- Instances of crime and antisocial behaviour – 6 respondents.

In addition to these responses on planning considerations, 111 respondents objected to the approval of the proposed development on grounds that are not considered to be relevant planning grounds under the 'Act', including concerns about competition for existing retail businesses, the objective need for another service station, health impacts from the sale and availability of junk and fast food and the potential for negative impacts on property values.

(The total number of responses on all issues is greater than the number of individual submissions because most respondents raised two or more issues.)

2. Submissions in support of approval of the proposed development

Of the 12 responses in support of approval of the proposed development, 10 respondents expressed the view that the proposed development would benefit the local community and visitors to the area by providing an increased range of products and services to an under-serviced location within the Adelaide Hills, particularly since the closure of The General Store Heathfield.

Several respondents highlighted the importance of convenient and flexible 24-hour trading which would meet the need for fuel and small-scale grocery items when other outlets are closed. As it stands after hours services require a trip to Crafers, Balhannah, Mount Barker or down the freeway to Glen Osmond.

Some respondents noted the site has a longstanding commercial use including the sale of fuel, which has been poorly maintained over many years and detracts from the amenity of the locality. The redevelopment including a mix of sympathetic materials and finishes will result in a vast improvement to the visual appearance of the land.

Several respondents said that the proposed retail fuel outlet will create additional jobs, boost the economy of the Adelaide Hills region, and provide increased competition which will reduce the cost of fuel.

Two respondents noted that the proposed manual car wash bays are a service that is not currently offered anywhere else in the Adelaide Hills.

One of the respondents indicated their support of the development but suggested the proposed inclusion of a fast-food restaurant was not in keeping with the hills character of the locality. The same respondent seeks clarification that the development includes the latest environmental safeguards with respect to the storage of fuel, the management of fumes, and waste disposal.

"Branded" fast food items such as KFC, McDonalds, and Hungry Jacks will not be provided from the control building. Instead, coffee, juice, and other beverages, limited prepared foods such as sandwiches, pies, salads, wraps, and other snacks, and convenience grocery items will be offered from the OTR in-store convenience range.

The applicant has a long and proud history of working with the EPA to ensure that its fuel sites satisfy the requirements and objectives of the Environmental Protection Act 1993. The proposed development will incorporate the best environmental practices with respect to vehicle refuelling facilities, further details on this point are provided below.

3. Response to issues raised by respondents opposed to the approval of the proposed development

Traffic Impacts

Issues raised

99 of the respondents expressed concerns about traffic impacts of the proposed development, including that it would exacerbate existing congestion in the area and would contribute to congestion at an already busy intersection; that fuel tanker movements would disrupt traffic and may impact nearby sensitive land uses; and that there would be safety risks to pedestrians including school children; and visibility/line of sight issues along Scott Creek Road.

Response to issues raised

The Site Traffic Compliance Statement (TCS) prepared by Stantec Consultants and provided in support of the proposed development demonstrates that the proposed layout of the site is appropriate and achieves appropriate sight distances from each crossover along Scott Creek and Longwood Roads. The capacity of the nearby road network is more than sufficient, to accommodate the anticipated traffic movements generated by and associated with the proposed development. In particular, the TCS finds that:

- Due to the location of the proposed development, it is expected that a high proportion of the traffic generated will be passing trade already present on the road network.
- The proposed development is not anticipated to have an adverse impact on the safety or operation of the adjacent road network.
- As demonstrated in the turn path drawings accompanying the report, a 16.4 metre long semi-trailer fuel tanker vehicle is able to enter and exit the site without any obstruction to other vehicles on Scott Creek and Longwood Roads. (The use of a 16.4 metre semi-trailer fuel tanker, instead of a smaller tanker vehicle, will allow for larger, less frequent deliveries of fuel, minimising the occasions for any potential congestion or annoyance arising from fuel tanker movements).
- The site can also readily accommodate the smaller vehicles which will be used for delivery of goods and removal of refuse, as well as all necessary passenger vehicle movements.
- The proposed development achieves appropriate sight distances from each crossover along Scott Creek and Longwood Roads when accounting for the Adelaide Hills location, expected vehicle speeds when approaching the intersection, and vegetation which is proposed to be removed within the Scott Creek Road reserve. The native vegetation assessment report prepared in support of the proposal indicates that the majority of vegetation within the Scott Creek Road reserve consists of planted and introduced flora species. Planted and non-indigenous species are not protected under the *Native Vegetation Act 1991* and therefore approval under, or compliance with the Native Vegetation Regulation 2017, is not required.
- There is sufficient space on-site for vehicles to traverse the site without being impacted by other vehicles queued while awaiting the use of a fuel dispenser position.

A separate traffic response to Council's RFI is currently under preparation by Stantec Consultants, the response will include traffic and pedestrian counts to better quantify the impact of the adjacent four-way intersection, updated vehicle swept paths overlaid on top

of a feature survey, and a more detailed assessment of the sight line distances along each road. The response will be uploaded to the PlanSA Portal shortly.

It is intended that when this application comes to be considered by the Council Assessment Panel, a representative of Stantec Consultants will be present and will be able to explain the basis for these conclusions and answer any questions that Panel members may have.

Noise impacts from 24-hour operation

Issues raised

56 of the respondents expressed concern about the noise impacts of the proposed development on the surrounding locality including nearby residential properties, noise impacts from vehicle movements, loud exhausts, amplified music, and late-night activity including yelling and screaming from people congregating at night.

Response to issues raised

Accompanying this letter is the Environmental Noise Assessment prepared by Sonus in relation to the proposed development and dated December 2021.

The report looks at the noise levels at these sensitive locations arising from activities at the proposed development and finds that the predicted noise levels will achieve the relevant requirements of the *Planning and Design Code* and the *Environment Protection (Noise) Policy 2007* subject to a series of recommended treatments, comprising:

- Specific fence heights and constructions.
- Installation of acoustic absorption in specific locations.
- Limiting any amplified music to be played outdoors to a level that is inaudible at the surrounding residences.
- Ensuring the auto wash is fully enclosed and the walls and roof have a minimum surface density.
- Installing of doors at the auto wash entries and exits.
- Reducing the noise from any alarms as far as practical.
- Ensuring all inspection points, gated trenches, etc. are correctly fixed.
- Restricting the times for fuel and other deliveries, manual car wash, vacuum bays, and dog wash (to between the hours of 7:00am and 10:00pm) and waste collection (to between the hours of 9:00am and 7:00pm on a Sunday or public holiday, and 7:00am and 7:00pm on any other day).
- Specific location and screening of the mechanical plant.

By implementing these recommendations, the report finds that the development will not detrimentally affect the amenity of the locality or cause unreasonable interference through noise, thereby achieving the relevant provisions of the *Planning and Design Code*.

To the extent the recommendations of the report call for specific built form elements, they are demonstrated on the site plan included on page 12 of the Sonus report (that is, the provision of automatic doors to the entry and exit of the automatic car wash facility, full wall heights between the manual wash bays, a 3m high acoustic fence on the extent of western, south-western and southern site boundaries and a portion of the eastern site boundary and the provision of screening to the plant on the roof of the control building). To the extent the recommendations require operational implementation, the applicant would be in agreement with the imposition of conditions on any development plan consent that would give effect to those recommendations.

It is worth noting that as part of a separate Request for Further Information (RFI) Council engaged Resonate Consultants to review the Sonus Environmental Noise Assessment and the outcomes of that review were presented in the Resonate Consultants report dated 25 March 2022. Sonus have prepared a response to the items raised in the Resonate Review in a second advice letter dated 14 August 2022. This letter will be uploaded to the Plan SA Portal as part of the Council RFI response.

It is intended that when this application comes to be considered by the Council Assessment Panel, a representative of Sonus will be present and will be able to explain the basis for these conclusions and answer any questions that Panel members may have.

Land Use

Issues raised

55 of the respondents expressed concern about the use of the subject land for the proposed development. Their concerns include that the proposed development is contrary to the desired outcomes and policy provisions of the Rural Neighbourhood Zone and Adelaide Hills Subzone and the 24-hour operation and the scale of the development are at odds with the semi-rural Adelaide Hills character of the locality. Additionally, some of these respondents raised concerns that the development would detract from the existing retail and commercial areas within nearby hills townships.

Response to issues raised

The proposed development of the site is entirely in keeping with the Desired Outcomes and policies of the Rural Neighbourhood Zone. Once operational the retail fuel outlet will provide improved access to a range of products, services, and facilities that will support the population within Heathfield and the wider locality south of Stirling. The scale of the proposed development is appropriate in the context of the size of the subject land at more than 2,000m². The control building and fuel canopy are of comparable scale and siting to the existing non-residential development on the land. The auto wash, manual wash, and vacuum facilities located on the vacant, under-utilised southern portion of the land are framed by generous landscaped garden beds. The landscaping will assist in reducing the visual impact of the built form and provide an added degree of separation from adjoining residential land uses.

The General Development Policies – Out of Activity Centre Development within the Planning and Design Code establishes how, in the context of the locality as an area that is underserved by small-scale retail land uses the proposed development is an appropriate use of land. Performance Outcome (PO) 1.1 states that non-residential development outside Activity Centres should be of a scale and type that does not diminish the role of Activity Centres. PO 1.2 states that Out of Activity Centre non-residential development should complement Activity Centres through the provision of services and facilities that support the needs of local residents and workers, particularly in underserved locations; at the edge of Activity Centres where they cannot readily be accommodated within an existing Activity Centre to expand the range of services on offer and support the role of the Activity Centre.

The proposed development will provide improved access to a wide range of day-to-day goods and services for hills residents in the locality, and for visitors to the area. The retail functions of the proposed development will not compete materially with any established Main Street or Township Activity Centre Zones in nearby Adelaide Hills townships, which are likely to be used and regarded by most residents as being appropriate for less frequent, planned shopping visits, compared to the proposed development which will cater predominantly to more frequent, day-to-day purchases.

The operating model of the proposed OTR retail fuel outlet, as for all OTR developments, is built on ubiquity, convenience, speed, and reliability. OTRs are easy to find, fast to access and

use, and provide a consistent range of well-stocked and presented products in a familiar environment. They are located on sites that are easily accessible to motorists who are passing by on the arterial road network, as well as to residents of residential areas within close walking or cycling range. They meet the frequent day-to-day needs of these customers, many of whom attend on an unplanned, ad-hoc basis as their other daily activities bring them close to or past an OTR site.

The functional distinction between the existing Main Street and Activity Centre shops and the proposed development means that the proposed development will not substantially compete with, or detract from the viability of, these existing areas. The proposed development will provide significant economic and social benefits to the surrounding areas and to the wider community through investment in construction, fit out and ongoing operation, including through the employment of between 10-12 persons (on a combined full-time and part-time basis) once the proposed development is operational.

The site has a long history of non-residential use as a motor repair station including the storage and sale of fuel. The use is no longer operational and the site is in disrepair and unsightly. The land is unsuitable for residential use. The proposed development will facilitate the remediation of any contamination associated with the previous use, upgrade and improve the visual appearance of the land and allow the opportunity for conditions to ensure the performance and management of the land is compatible with the amenity of the locality.

Ethos Urban have been engaged to conduct economic and retail modelling in support of the proposed development. The report will review the local context of the subject land and provide commentary on the extent to which the proposed development will support the locality through the provision of products and services on an limited and appropriate scale.

Environmental impacts, Pollution and air quality

Issues raised

53 of the respondents expressed the concern that oil and fuel spills would pollute nearby watercourses and threaten the habitat of local wildlife. These respondents also expressed general concerns about rubbish, pollution, odour or vapour impacts of the proposed development.

Response to issues raised

The proposal incorporates best environmental practices with respect to the management and operation of retail fuel outlets. The development application outlines the significant measures that will be taken to ensure that there is no material adverse impact or pollution risk from the delivery, storage, and dispensing of fuel on the site. These measures include:

- Provision of Stage 2 vapour recovery systems to fuel storage tanks to capture any emissions arising upon delivery of fuel to the site.
- Double-walled fiberglass fuel and LPG tanks that comply with applicable Australian/New Zealand Standards.
- Ongoing monitoring of fuel variances to detect potential leakage, and use of automatic tank gauging to detect discrepancies in tank levels.
- Double-walled fuel lines from the underground storage tanks to the dispensers, and dispensers fitted with a mechanical pressure leakage detection mechanism, which automatically shuts off the fuel pump in the case of pressure anomalies to minimise any potential for fuel leakage.
- Ongoing visual inspection of the single-walled fuel line from the tanker fill box to the underground storage tanks, to ensure that the potential for leakage and spill is monitored when fuel is delivered to the site, and submission of daily fuel

reconciliation data for reconciliation analysis to be undertaken by a qualified third party.

These measures, developed by Peregrine and applied systematically and effectively at OTR sites across South Australia and interstate, enable the risk of any adverse environmental consequences to be identified, monitored, minimised and addressed.

A request for further information has been received from the Environment Protection Authority (EPA) in relation to any potential risks to human health or amenity which will result from the proposed development, and a response is under preparation. The response will be provided to Council at the same time it is sent to the EPA.

All stormwater is treated on-site to ensure no pollutants find their way into nearby watercourses. Stormwater from high-risk areas will be diverted through a Class 1 full retention system comprising a SPEL Purceptor Class 1 full retention separator system with an alarm and an additional 10,000 litre retention tank or approved equivalent. Sludge collected by the SPEL system will be pumped out on an annual maintenance schedule removed from site and disposed of by a qualified contractor.

Waste generated on the site will be stored in the designated on-site refuse enclosure, directly adjacent to the control building, and will be collected on a regular basis by a commercial waste contractor.

The location of the refuse area to the western boundary of the subject land will not have an unreasonable impact on the amenity of the adjoining properties through odour for the following reasons:

- Waste will be collected from the site on a daily basis by an accredited waste management contractor to minimise the chance of odour generation.
- The waste management contractors are required to comply with collection schedules and are provided with a detailed site brief that details the approved collection times for each site.
- Stock is increasingly delivered to site from the OTR Distribution Centre on a single pick basis and delivered in reusable food grade containers, which will further minimise the amount of waste generated at a site level.
- OTR Convenience Supermarkets generate waste predominately taken the form of packaging and expired stock.
- General waste is generated in the form of consumer waste such as cups and packaging, coffee grounds; unsold prepared food items and other general waste.

The applicant has a Waste Management Plan (WMP) which addresses the management of waste generated during the operation of an OTR site. The document is used as a basis for managing waste as well as mitigating and monitoring the environmental impacts associated with the operation of OTR sites. This WMP will form the basis for waste management at OTR Heathfield.

The impact of litter arising from the operation of the proposed development on the site and its surrounds will be monitored and managed as necessary and appropriate, as occurs at all existing OTR sites. There is little or no ongoing concern about litter impacts from any existing OTR sites.

Light spill

Issues raised

44 of the respondents raised concerns about the lighting impacts of the proposed development. Specifically, the concerns of all 44 respondents related to light spill impact from the 24-hour operation of the proposed use, the illuminated buildings, signage and the

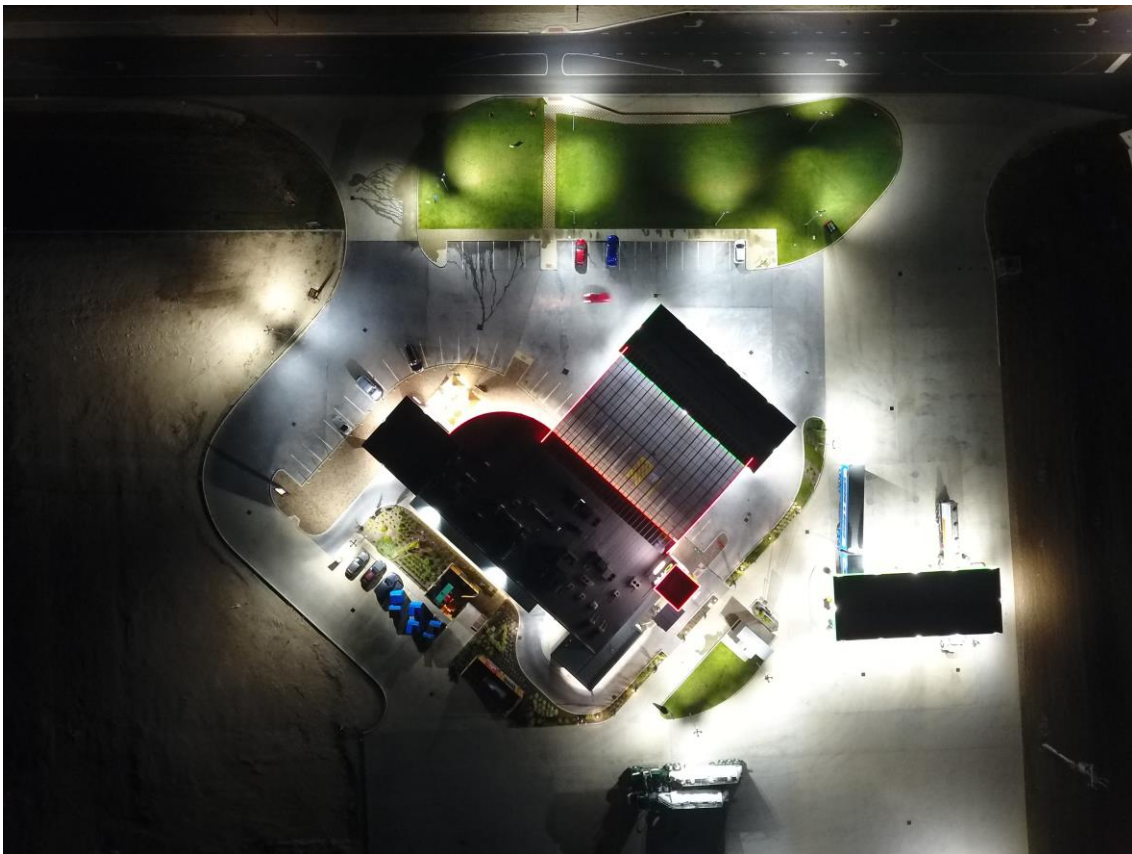
vehicle circulation areas. Further clarification was sought on how the potential impact of light spill on nearby residences will be managed.

Response to issues raised

An Obtrusive Lighting Assessment report dated 15 August 2022 was prepared by TMK Consulting Engineers and submitted in support of the application at Council's request. It considers the external lighting associated with the proposed development, including whether light spill into adjacent properties will meet the requirements of current Australian Standards.

Taking account of external lighting and signage at the site, the report finds that the modelled maximum light spill on all boundaries of the site for external lighting complies with the criteria outlined in the applicable Australian Standard. It recommends that a dimmable controller be installed to pylon sign lighting, with the lighting of those signs dimmed to a maximum of 5 lux across the boundary line during pre-curfew hours, and a maximum of 1 lux at all other times. These recommendations will be adopted when completing the design and installation of lighting and signage at the site. A copy of TMK's report is included with this correspondence.

The overhead night-time drone photograph taken at the OTR Tailem Bend (Motorsport Park) site, included below, demonstrates the effectiveness of LED down lighting and spill guards in confining light spill within the boundaries of a service station site.



Drone photograph illustrating night time lighting impact at OTR Tailem Bend (Motorsport Park)

Visual or aesthetic impact (including signage elements)

Issues raised

Concerns about the visual or aesthetic impacts of the proposed development, including its signage elements, were expressed by 28 of the respondents to notification of the proposal.

Respondents were concerned about the visual impact of the proposed development on its road frontages and its response to the local environment and built form; including its visual

impact in the context of the Rural Neighbourhood setting; and the loss of rural vistas. The design and profile of the proposed buildings, and their materials and finish, were seen as inconsistent with the surroundings.

Respondents also said that the proposed number of signage elements and their size was excessive; that the signage would disfigure the locality, was not consistent with the hills character of the area and would distract drivers.

Response to issues raised

The design of the proposed development includes a mix of architectural elements and high-quality materials and finishes which will provide a high standard of presentation and visual interest to its street frontages. It will be a modern, contemporary facility that also includes elements that reflect the heritage and character of Heathfield, for example through the use of a muted colour palate and non-reflective material finishes that are designed to blend in with their surroundings, and through the use of timber screening to the fuel canopy columns adjacent the Longwood and Scott Creek Road frontages of the site. Both road frontages and areas within the site are extensively landscaped.

Signage elements of the proposed development have been carefully considered as being appropriate for the site and its context, including the fact that the proposed development is on a corner allotment with road frontages exceeding 110 metres in total. The proposed signage is orderly and integrated with the built form proposed for the subject land, and is limited to what is reasonable for informing customers and passers-by of the on-site offer.

On the northern and eastern elevations of the control building and fuel canopy (facing outward from the site to the Longwood Road and Scott Creek Road frontages) a minimal level of signage required to identify the business is proposed. No signage is proposed to be displayed on the southern and western elevations of the control building, auto and manual carwash facilities facing adjoining residential land uses.

The signage proposed will not dominate the locality nor does it result in visual disorder or clutter of signs. Those signage elements which are illuminated will not interfere with or obstruct drivers' lines of sight at any intersection, and will not be mistaken for a traffic control device. There will be no hazard to vehicles or pedestrians.

Where signage is back-illuminated, it will be illuminated with side-mounted LED strips which have a 160-degree beam angle and which will provide no direct glare to the signage panel and a softer and even light to the signage box.

The single 7-metre pylon sign is comparable to pylon signage at other retail fuel outlets at sites throughout the Adelaide Hills. The pylon will be provided with a dimmable controller and will be dimmed to a pre-curfew hours maximum of 5 lux across the boundary line, and a maximum of 1 lux (light output to the roadway) during curfew hours.

Overall, the proposed development will make a significant and positive contribution to locality by facilitating the replacement of a longstanding commercial use including the sale of fuel, which has been poorly maintain over many years and detracts from the amenity of the locality. The redevelopment including a mix of sympathetic materials and finishes will result in a vast improvement to the visual appearance of the land.

Bushfire risk

Issues raised

18 of the respondents raised concerns about the development of a retail fuel outlet in an area prone to bushfire. Several of these respondents highlighted the potential risk of locating an underground tank farm with 70,000L fuel storage capacity in such an area. Some of the respondents were concerned about the subject land's proximity to bushland and the Mark Oliphant Conservation Park and other tracts of bushland. One respondent is concerned the

proposed development does not demonstrate sufficient compliance with the requirements of the Hazards (Bushfire – High Risk) Overlay.

Response to issues raised

The proposed development is not expected to result in any adverse safety impacts or exacerbate prevailing conditions during a bushfire event. The design of the subject land will provide a level site, accommodating safe and efficient access to emergency service vehicles including rigid and articulated heavy vehicles from Scott Creek Road. All buildings and structures on site are proposed to be constructed using fire-resistant materials including steel substructure, concrete tilt slab walls, Colorbond roofing, glazing and will be equipped with essential fire safety equipment including fire hose reels and fire extinguishers. The fuel tank farm is located underground and will be isolated from above-ground infrastructure in the event of a fire on the subject land. Furthermore, the buildings are within close proximity to both Longwood Road and Scott Creek Road and the site is serviced by mains water. The subject land has excellent vehicle permeability, and a safe means of evacuation is possible by utilising the proposed and existing road infrastructure.

It is noted that the storage and sale of fuel have occurred at the site for many years. The proposed development will facilitate the removal and replacement of the existing dated fuel infrastructure, including the underground fuel tank. If approved the new fuel infrastructure will incorporate the latest safety treatments and measures with respect to fire prevention and mitigation.

A qualified fire services engineer has been engaged to review the proposed development in the context of the subject land's location within the Hazards (Bushfire – High Risk) Overlay. The recommendations of the report will be adopted by the applicant and included within the site design. The report will be uploaded to the PlanSA Portal shortly.

Instances of crime and antisocial behaviour

Issues raised

6 of the respondents raised concerns about instances of crime and antisocial behaviour arising from 24-hour operation of the proposed Retail Fuel Outlet.

Response to issues raised

The applicant contends that the proposed development if approved will likely result in a reduction to instances of crime and antisocial behaviour. As a result of 24-hour trade 7 days per week, the site will be lit, secured, and attended by trained staff at all times. The site will have the benefit of CCTV cameras and surveillance system, constant passive surveillance from an attendant staff member, windows providing a clear line of site, external lighting, to enable clear vision, and prevent concealment and shadowing (but also so as not to impact adjoining residents) and intruder alarms and access-controlled doors. The existing land use and buildings which are now unoccupied do not have the benefit of these measures and simply provide for a site that is dark and unattended, and located adjoining the poorly lit Scott Creek and Longwood Roads. Accordingly, the site will obtain the benefits of constant (reasonable) lighting and security, but with minimal detriments arising from night-time usage of the site.

4. Non-planning related issues raised by respondents

Over proliferation of existing service stations and sale of junk and fast food

This is not a valid planning concern. All applications must be dealt with according to their merits. The level of current supply and demand for a particular use within the surrounding area is a business consideration for the applicant. Generally, the development control system leaves the number and density of particular retail / commercial land uses to be determined

by market forces. The commercial viability of the proposed retail fuel outlet and the determination of an acceptable density for such a use is beyond the scope of the development control system.

Property values

While the impact of the proposed development on property values of nearby sites is not a relevant planning consideration, there is no evidence, and no reason to suppose, that the proposed development will have any impact on the value of nearby sites that differs from the existing condition and use of the site, or from any alternative use that might be made of the site.

The proposed development will provide retail goods and services to meet the day-to-day needs of existing and future residential areas of Heathfield and other surrounding Adelaide Hills suburbs, and in doing so will enhance the liveability of those residential areas and exert a positive influence on residential property values.

Competition with existing retail businesses

A number of respondents have expressed the view that some elements of the proposed development are “not needed” or are undesirable because they may compete with existing businesses. While this is not a valid planning consideration in respect of the proposed development, it is recognised that the General Development Policies – Out of Activity Centre Development requires that non-residential development outside a designated Activity Centre should be of a scale and type that does not diminish the role of Activity Centres. Out of Activity Centre non-residential development should complement Activity Centres through the provision of services and facilities that support the needs of local residents and workers, particularly in underserved locations.

For reasons set out above under the heading Land Use, the proposed development will provide improved access to day-to-day goods for current and future residents in new residential growth areas north of the subject land, and for visitors, without competing materially with or hindering the development, function or viability of any established Activity Centre Zone or other existing businesses outside of these areas.

I trust that this information in response to representors’ submissions will assist Council in its further assessment of the application.

Please contact me on telephone 0439 883 977 or by email t.beazley@peregrine.com.au if you wish to discuss the above.

Yours faithfully



Tim Beazley
Town Planner
Peregrine Corporation