
From: Justine Brooks [REDACTED]
Sent: Saturday, 2 May 2026 12:24 AM
To: Kingborough LPS
Cc: [REDACTED] Sally O'Neal
Subject: Submission - Citylight Church - Response to Ireneinc Review Report
Attachments: Submission Citylight Church Kingston - response to Ireneinc Review Report JB010526.pdf

Dear Tasmanian Planning Commission Panel Members

Attached is a written submission responding to the Ireneinc Direction 69 Review Report on the application of the Landscape Conservation Zone in Kingborough.

This submission is lodged on behalf of the CityLight Church for land located at [REDACTED] and [REDACTED] Kingston.

Kind regards

Justine

pitt&sherry

Associate Project Manager
Urban Planner

Justine Brooks RPIA GTLP

MEnvPlg MBA
DipPM DipGov(PM)

+61 429 201 271
jbrooks@pittsh.com.au

Level 2, 93 York St, Launceston, TAS, 7250
PO Box 1409 Launceston Tasmania 7250 | Phone +61 3 6323 1912



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pitt&sherry acknowledges the Traditional Custodians of the many Countries throughout Australia and their connections to land, sea and community. We acknowledge the contributions and sophistication of Aboriginal and/or Torres Strait Islander knowledge

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Submission to the Tasmanian Planning Commission

Draft Kingborough Local Provisions Schedule

Submission on the Ireneinc LCZ report – [REDACTED], Kingston and [REDACTED], Kingston

Prepared for: CityLight Church

Prepared by: Justine Brooks

Qualifications: MEnvPlg MBA

Organisation: pitt&sherry

Date 1st May 2026

1. Introduction

This submission is made on behalf of CityLight Church following the Tasmanian Planning Commission's invitation to comment on the Ireneinc report (prepared in response to Direction 69). The Ireneinc report reviews the proposed application of the Landscape Conservation Zone (LCZ) to part of the land at [REDACTED], Kingston and [REDACTED] Kingston.

CityLight Church supports applying the Community Purpose Zone to the main developed part of the site. This submission is limited to the north-eastern portion of the landholding (the subject area), which is proposed to be included in the Landscape Conservation Zone.

CityLight Church does not consider the Landscape Conservation Zone to be the most suitable zoning outcome for that part of the site. While the land contains vegetation and contributes to the bushland setting, it also contains established dwellings and forms part of an established church, school and community site that is developed and in active use.

For the reasons set out below, CityLight Church submits that the northern portion of the land should be included in the Community Purpose Zone, or alternatively the General Residential Zone, rather than the Landscape Conservation Zone.

2. Land the Subject of this Submission

This submission relates to the north-eastern portion of the CityLight Church landholding at [REDACTED], Kingston and [REDACTED] Kingston.

For clarity, the land addressed by this submission is limited to the area proposed to be zoned Landscape Conservation (the subject area).

This submission does not relate to the whole CityLight Church site, and it does not challenge the proposed Community Purpose zoning over the main church and school buildings.

The subject area is the north-eastern portion of the landholding. It is the part proposed to be included in the Landscape Conservation Zone.

That distinction is important because the land proposed for Landscape Conservation is not an isolated bush block. It includes established residential dwellings and forms part of the wider CityLight Church site. It adjoins existing residential land and sits immediately above the church, school and associated community uses.

It also directly adjoins the Oak Tree Retirement Village (over 50 units) on the same title, reinforcing that the subject area sits within an established, urban-edge community setting.

On that basis, the proposed Landscape Conservation Zone would apply to land that is already developed and occupied, and which functions as part of a broader urban and community setting.

3. Issue in Dispute

The issue for consideration is whether the Landscape Conservation Zone is the most suitable zone for the northern portion of the land.

CityLight Church acknowledges the land contains vegetation and contributes to the bushland character of the area.

The question is whether those landscape attributes should outweigh the land's existing use, its urban-edge setting, the surrounding zoning pattern, the established dwellings, the wider function of the site and the land's likely future role.

CityLight Church submits that they should not.

The land is not appropriately characterised as a conservation parcel. It is more accurately characterised as part of an established and functioning church, school and community site, with established residential use and a logical future role connected to the wider site.

For those reasons, the proposed Landscape Conservation Zone should be reconsidered.

4. Existing Use and Development

The land proposed to be included in the Landscape Conservation Zone is not vacant or undeveloped. It contains established residential dwellings that are occupied and operate as part of the wider site.

Relevant site context includes:

- The subject area includes a residential strip of 7 fully occupied houses.
- Those houses were constructed from 1985 onwards.
- Ownership across the houses includes a mix of church-owned and privately owned houses (including some owned by church members).
- The subject area directly adjoins the Oak Tree Retirement Village (over 50 units) and is on the same title.
- The school on the wider CityLight Church site currently has approximately 310 students.
- The main school building commenced construction in 1986.

Those dwellings are not isolated. They sit within a long-established site used by CityLight Church for worship, education, housing and community support.

The wider CityLight Church site includes a church, a school, associated community buildings, accessways, parking, residential accommodation and support uses. The site has operated in this form for many years and continues to function as an integrated community campus.

This matters because the land in question should not be assessed as though it were a separate bush lot. It is part of a larger, established site with an ongoing community function.

The northern portion of the site forms part of the wider CityLight Church site and is a logical area to accommodate future growth associated with the church, school, housing or related community services, subject to appropriate planning controls.

This does not suggest future development should occur without proper assessment. Rather, it supports zoning that reflects the land's current role, its setting and what it can reasonably support over time.

5. Strategic Context

The land is within the Kingston urban area and within the Urban Growth Boundary.

- It adjoins existing residential land and sits immediately beside the main CityLight Church campus.
- It is part of urban Kingston, rather than remote bushland detached from surrounding development.
- It forms part of the urban edge and sits within a serviced and developed setting.
- This context is relevant to the appropriate zoning outcome.
- The land has been developed for high density retirement housing, sits next to other residential land, and is adjacent to land used for church, school and community purposes. It is also capable of being serviced as part of the broader urban area.
- The third title, which is not subject to split zoning, contains seven multiple dwellings which are owned by either the Church or members of the Church.

These factors point towards an urban zoning outcome rather than a conservation-led outcome. In that context, it is relevant to consider the basis on which the Landscape Conservation recommendation was formed.

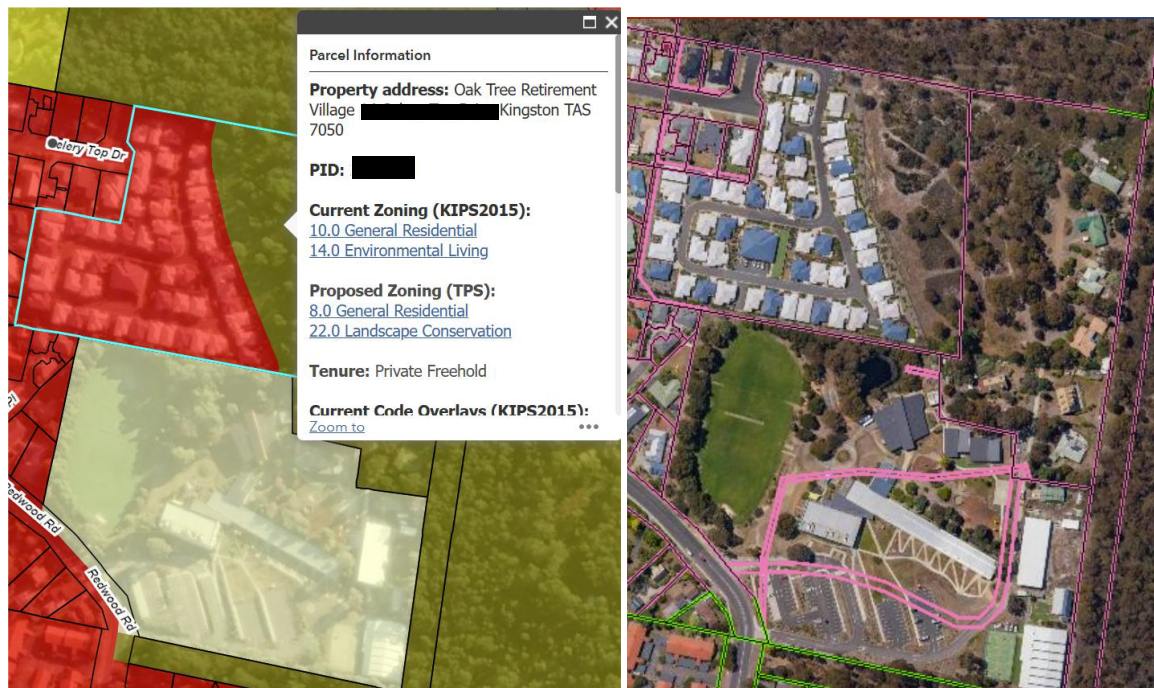


Figure 1: Kingborough LPS Mapping – Oak Tree Retirement Village - [redacted], Kingston

Figure 2: ListMap aerial showing overall site and the extent of development and community purpose use

6. Ireneinc Review

The Ireneinc review is relevant, but it should not be treated as conclusive.

The Commission's letter notes that Ireneinc recommended the split zoning remain, with part of the land identified for the General Residential Zone and part identified for the Landscape Conservation Zone. CityLight Church respectfully queries whether that recommendation was made with a full understanding of how the land is used.

The hearing material indicates Ireneinc assessed the area largely by desktop review. The broader locality was described as residential land in a bushland setting, generally comprising larger lots with dwellings. The reviewer noted the CityLight Church site appeared to contain several buildings, but stated it was not clear from desktop review what those buildings were used for. For completeness, the subject area includes a long-established residential strip of 7 fully occupied houses, constructed from 1985 onwards. The wider site has operated for decades as a church/school campus, including a school of approximately 310 students and a main building that commenced construction in 1986.

This is an important limitation.

The recommendation appears to have been formed without fully recognising that the site operates as an integrated church, school, housing and community support site, rather than simply a collection of buildings in a vegetated setting.

Zoning should respond to how land is used in practice, not only how it appears in aerial imagery.

The hearing material also records an acknowledgement that the Community Purpose Zone may better reflect the activities occurring on the land, even though the Landscape Conservation recommendation was retained at that point.

This indicates there was some uncertainty about whether the Landscape Conservation Zone was the best planning fit.

The additional site-specific information provided in this submission assists in addressing that uncertainty and supports a different zoning outcome.

7. Section 8A Guidelines

The Section 8A Guidelines require zoning to align with the purpose of the zone and how well that purpose matches the land.

This includes considering the existing use and development of the land, the surrounding area, the likely future use of the land, available services and the wider planning context.

When these matters are considered across the three possible zones, the Landscape Conservation Zone is the weakest fit for the subject land.

The Community Purpose Zone is the strongest fit because it reflects the broader use of the land as part of an established church, school and community campus and supports that role continuing in an orderly way.

The General Residential Zone is also a reasonable fit because the land already contains houses, adjoins other residential land and sits within the Kingston urban area.

By contrast, the Landscape Conservation Zone gives priority to landscape protection over the role the land already performs. This sits uneasily with the existing dwellings on the site, its location beside established urban land and its connection to the wider CityLight Church site.

A comparison of the three zones as they apply to the subject land is provided at Attachment 1.

8. Why Landscape Conservation is Not the Best Fit

The proposed Landscape Conservation Zone places too much emphasis on the vegetated appearance of the land and not enough emphasis on how the land is used.

The land is not vacant conservation land. It contains established houses and forms part of a larger site used for housing, worship, education and community support.

The proposed zoning is not well aligned with that reality.

It treats the land as though its main planning purpose is landscape protection, when in practice its role is tied to an existing urban and community site.

This does not mean landscape values should be ignored. Rather, they should be managed through appropriate planning controls.

Vegetation, scenic values and bushfire matters can be managed through relevant planning scheme

overlays and code provisions, where they apply, together with any necessary site-specific conditions on future use and development. Those tools can operate regardless of whether the land is zoned Community Purpose or General Residential.

In particular, where a substantial retirement village (Oak Tree Retirement Village, over 50 units) is immediately adjacent and on the same title, applying a conservation-led base zone to the adjoining vegetated land raises land use compatibility considerations and warrants careful attention to the interface between those uses. Vegetation character and hazards such as bushfire are more appropriately addressed through the applicable codes and overlays, rather than by setting landscape conservation as the primary zoning purpose for part of an otherwise established urban and community site.

The Bushfire-Prone Areas Code is directed to ensuring use and development is appropriately designed, located, serviced and constructed to reduce risk to human life and property. In that context, the interface created by applying a conservation-led zone over vegetated land immediately adjoining (and on the same title as) a substantial retirement village (over 50 units), and within the overall church/school campus accommodating over 310 students, warrants a cautious approach to zoning at the urban edge. Put simply, it supports a zoning outcome that reflects the land's existing community and residential role, with bushfire and vegetation matters addressed through the relevant codes and overlays as they apply.

The key question is whether landscape conservation should be the primary planning purpose for this land.

In CityLight Church's view, it should not.

9. Preferred Zoning Outcome

CityLight Church considers the Community Purpose Zone is the best fit for the northern part of the site. This is because it reflects how the wider site functions and supports future growth of the church, school and associated community services in an orderly way that is consistent with the rest of the site.

If that outcome is not supported, the General Residential Zone is the next best fit.

This would reflect the existing dwellings, the surrounding residential pattern and the land's urban setting.

Either outcome would better reflect the land than the proposed Landscape Conservation Zone.

10. Conclusion

CityLight Church respectfully submits that the proposed Landscape Conservation Zone is not the appropriate zoning for the northern portion of the land at [REDACTED], Kingston and [REDACTED], Kingston.

That part of the site is not vacant bushland. It contains established residential dwellings, sits within the Urban Growth Boundary, is capable of being serviced and forms part of a wider church, school and community site.

As outlined in Section 4 (and noted in Section 6), this includes a long-established residential strip of 7 fully occupied houses (constructed from 1985 onwards) and forms part of the wider church/school campus (including a school of approximately 310 students and a main building commenced in 1986).

The Ireneinc review recommendation does not appear to reflect a full understanding of how the CityLight Church site functions in practice, including how the buildings are used. The hearing material records an acknowledgement that the Community Purpose Zone may better reflect the activities occurring on the land, even though the Landscape Conservation recommendation was retained at that point.

When the land is considered in context, and the Section 8A Guidelines are applied to the land's use and setting, the preferable planning outcome is the Community Purpose Zone, or alternatively the General Residential Zone.

For those reasons, CityLight Church respectfully requests that the proposed Landscape Conservation Zone be reconsidered and that the northern portion of the land be included in either the Community Purpose Zone or the General Residential Zone