
From: Alexandria Bed and Breakfast [REDACTED]
Sent: Wednesday, 16 September 2026 4:37 PM
To: TPC Enquiry
Subject: Representor Submission - Waratah Wynyard draft amendment PSA 1-2024 and permit SD2191, Lot 2 Gold Links Road Wynyard
Attachments: Representor Response to Planning Authority Submission_Lot 2 Golf Links Road_260916.pdf

Hi,

Please find attached our representor response to the planning authority's submission in response to the Commission's directions letter dated 12th August 2026.

Our response has been provided as requested by close of business, assumed to be 5 pm, on 16 September 2026.

Kind Regards,

Andrew and Rachel Arnold

[REDACTED]
Wynyard, TAS, 7325
Tel: [REDACTED]

16th September 2026

Dan Ford

Delegate (Chair)

Tasmanian Planning Commission

Level 3, 144 Macquarie Street Hobart

Dear Dan,

RE: Tasmanian Planning Scheme – Waratah Wynyard Draft Amendment PSA 1-2024 and permit SD 2191

We would like to present our response regarding the planning authority submission (dated 27th August 2026) in response to the Commission's directions letter dated 12 August 2026.

We appreciate the opportunity as a representor and acknowledge the submission's inclusions:

1. Tasmanian Planning Policies
2. Cultural Heritage assessment
3. Hazard Code Reporting (Flood Prone Areas, Coastal Inundation and Coastal Erosion, and additional sections (amended))
4. Geoton Geotechnical assessment report (additional amended sections)

Our comments regarding the submission's inclusions are outlined below. The page numbers referenced are those of the submission document.

1. Tasmanian Planning Policies

1.1 Growth – page 6

Application: Applicable as the existing settlement along Golf Links Road is within the town boundary and was identified as having potential for future settlement growth through the Liveable Waratah-Wynyard Settlement Strategy

Strategies:

- *assisting in delivering at least a 15 year regional supply of land that is available*
- *Planning for growth by intensification of underutilised land within an existing settlement*

Our comment:

Please refer to the below comments, as extracted from our initial representation, regarding our main topics of concern, item 2. Not supported by Adopted Waratah-Wynyard Settlement Strategy, July 21:

Throughout the development of the Waratah-Wynyard Settlement Strategy, River Road was the first recommendation for the Growth front which the Outline Development Plan has now been developed for (late 2025). Refer to Figure 4 which is a copy of Figure 3.12, page 92 of the Strategy.

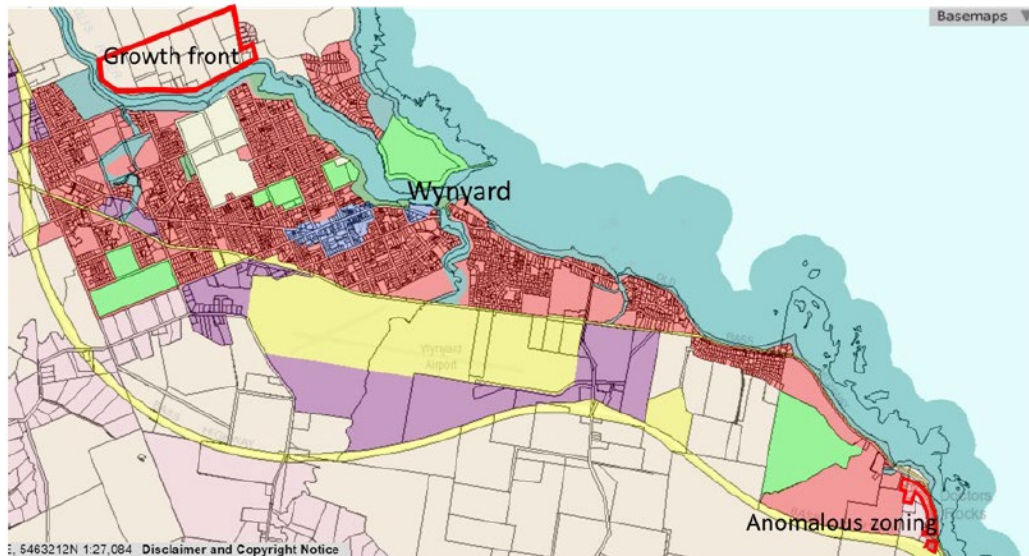


Figure 1 River Road identified as Growth front for Liveable Waratah-Wynyard Settlement Strategy

The 2023 PDA report states that “the land has been considered as part of the strategic plan for the Waratah Wynyard municipality. Whilst the site wasn’t considered the primary site to expand, this was due to the site being considered with the title to the North. The site is ranked as high or higher than the preferred site outside of the landslip hazard and most of the landslip is contained within the northern title.”

This area was not recommended by the Settlement Strategy; in fact, it was the 7th out of 8 potential areas for the growth front of Wynyard. In fact, it is undesirable.

The 8 candidate sites, all identified as owners wanting to develop for years, which were considered for rezoning undertook assessment on 7 different characteristics, as shown in Figure 5 which is originally Figure 3.14, page 103, from the Liveable Waratah-Wynyard Settlement Strategy.

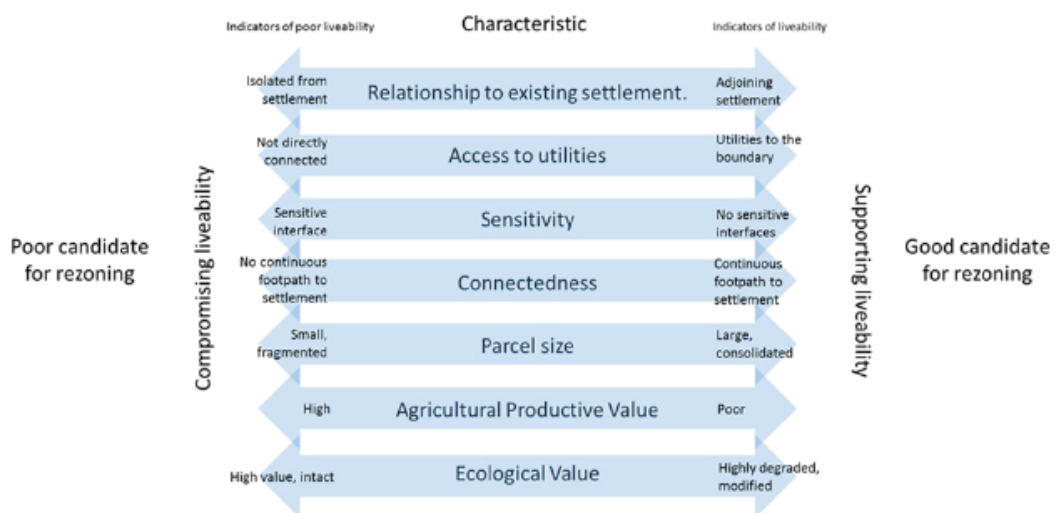


Figure 3.14 Site characteristics that determine the appropriateness of candidate sites for rezoning

Figure 2 Site Characteristics of candidate sites for rezoning (from Liveable Waratah-Wynyard Settlement Strategy)

The focus area of this proposal, Lot 2, was labelled as River Road East in the investigation. A summary of the candidate sites is shown in Figure 6 (from Appendix 5 of the Liveable Waratah-Wynyard Settlement Strategy)

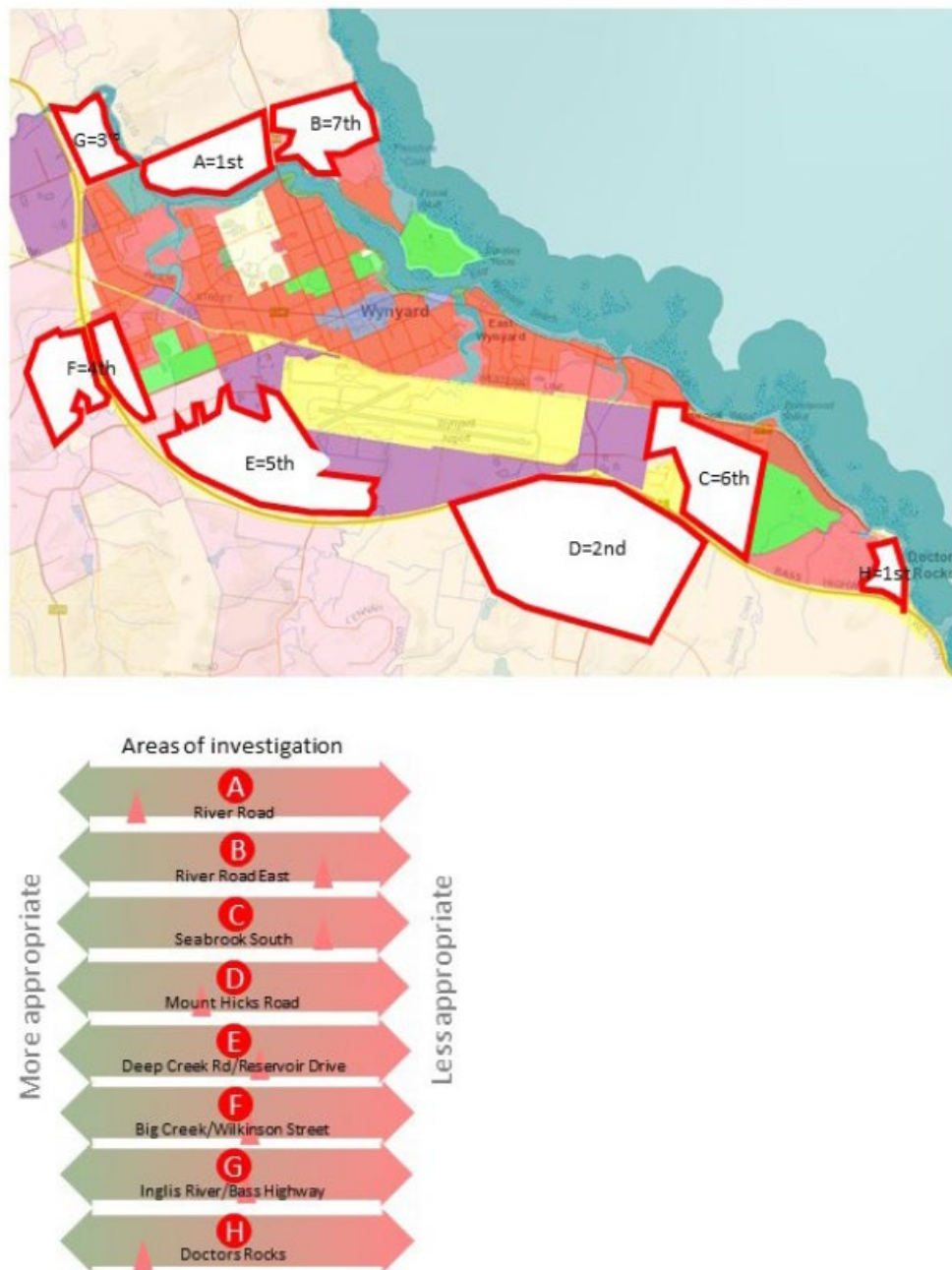


Figure 3 Candidate Sites ranking after investigation

Further commentary on Lot 2 is also mentioned in the Strategy on page 110 as shown in Figure 7. Essentially, sites are not approaching exhaustion with the River Road area only just having the Outline Development Plan late last year and have not reached capacity to meet projected demand. This proposed site, Lot 2, is not required to be rezoned as River Road is not approaching exhaustion and no unexpected issue has interrupted or threatens to interrupt supply.

Commentary on alternative sites raised in consultation Dec 20-Feb 21

Two further sites have been identified by proponents as having particular merit for rezoning. These are land at Golf Links Road Table Cape and at lot 1 and lot 2, 237 Old Bass Highway Doctors Rocks, (proposed for GRZ and LDRZ respectively by their proponents). These sites had previously been excluded from the shortlist considered in this Strategy because of site issues particularly though not exclusively relating to drainage. The proponents both stated these problems have been addressed. However, these claims are based on evidence that Council was not aware of and interpretations of that evidence that Council has not tested as it is required to do. Furthermore, although the case for rezoning may indeed have merit with these issues addressed, the case for these sites are not as strong as the sites identified in recommendation 1 and as the sites in this recommendation have the capacity to meet projected demand there is no immediate need to rezone more land from a community perspective.

Consequently, the proponents are invited to undertake the investigations necessary to establish if their sites are suitable for development and their sites may then be considered in a revised list when;

the sites outlined in this recommendation are approaching exhaustion or;

an unexpected issue interrupts supply or threatens to interrupt supply.

Figure 4 Commentary on alternative sites from page 110, Liveable Waratah-Wynyard Settlement Strategy

Further to the above extract from our initial representation and following from a statement from Council representatives during the hearing held 5th August, that River Road has stalled and reasons for is not for public knowledge. An outline development plan is in place for River Road but at the direction of Council that it is not to be continued but rather let market interest dictate the application process.

With the work of the settlement strategy identifying that Lot 2 is undesirable and therefore work on the River Road development plan went ahead – why is the process changing? We have not received any communications with respect to any changes to the Settlement Strategy since it was adopted in 2021.

Council needs to be transparent with concerned community members with respect to the application process and growth front development areas. A lack of process is evident with no real reasoning which does not provide confidence that any recommendation included in the Lot 2 application will be administered during development (if approved).

1.2 Liveability – page 6

Application: Not applicable as proposes a rural residential settlement

Our comment:

The River Road development was chosen as the growth front due to high rating of liveability and has rural residential lots. Lot 2 is similar distance to town centre etc as River Road. We're confused as why it's deemed not applicable.

1.4 Settlement types – page 6

Application: Applicable as the existing settlement along Golf Links Road is within the town boundary and was identified as having potential for future settlement growth through the Liveable Waratah-Wynyard Settlement Strategy”

Objective: Achieves the Objective to plan for the sustainable use

Strategies:

- *The amount of land being allocated to rural residential use and development is minimal and does not constitute a significant increase in the immediate vicinity*
- *Due to the existing built form, the potential for land use conflict has been reduced*

Our comment:

What is more sustainable than keeping Agricultural land, no matter how small, and adjacent to other Agricultural land to the north of the northern boundary? Sustainable use is to keep it as Agricultural – if the current landowners used it, then it is sustainable under the Agricultural zone.

River Road has been identified as the growth front and will have more land size available for rural residential. If Lot 2 development is minimal and does not constitute a significant increase in the immediate vicinity, then why need it when a larger area on the other side of Table Cape Road, River Road, is further along the process?

There is currently no conflict as the agricultural land along the northern boundary adjoins Lot 2. There will be a conflict of land use to the Agricultural land to the North if this application is successful with further future subdivision of Lot 2 as it will restrict and confine this agricultural land.

1.5 Housing – page 7

Application: Applicable as the existing settlement along Golf Links Road is within the town boundary and was identified as having potential for future settlement growth through the Liveable Waratah-Wynyard Settlement Strategy

Objective: Achieves the Objective to provide for sufficient supply of diverse housing stock that is well located and well services to meet the existing and future needs of Tasmanians.

Our comment:

As per our comments for 1.1 Growth and 1.4 Settlement types with respect to the settlement strategy statement – Lot 2 was not identified as the growth front for Wynyard. River Road is identified as the growth front and an Outline Development Plan is in place.

As per Figure 7 in 1.1 Growth, the settlement strategy states that Lot 2 “*may then be considered in a revised list when;*

The sites outlined in this recommendation are approaching exhaustion or;

An unexpected issue interrupts supply or threatens to interrupt supply.”

Why is Lot 2 being pursued “to provide sufficient supply of diverse housing stock” when River Road has rural residential use included? Or is the statement during the 5th of August hearing with respect to River Road being stalled is the unexpected issue interrupting supply? The planning authority needs to provide further information on the status of River Road both in general to concerned adjacent landowners and with respect to seemingly ‘pushing’ this Lot 2 application through ignoring due process that has occurred regarding the settlement strategy and River Road Outline Development Pln.

2.1 Biodiversity – page 8

As per our representation to the planning authority for the River Road development plan as well as our initial representation to this application, we do not understand that / or have received as requested as part of our representation, an environmental assessment of the impacts the development will have on

the Inglis river, nearby agricultural land and biodiversity of the area. Council planners informed us that this will be part of the ongoing process for the River Road development. As Lot 2 Golf Links Road is in a similar vicinity to the Inglis River as the River Road development, we believe it should be treated in a similar manner during the application process.

2.2 Waterways, wetlands and estuaries – page 8

Objective: *Achieves the Objective to protect and improves the quality of Tasmania's waterways, wetlands and estuaries.*

Strategies: *Achieves the Strategies by:*

- *protecting the waterway and coastal protection area identified in the western portion of the site. There is no development proposed in this protection area.*
- *the development which is located on land in, or around a waterway will avoid clearing of native vegetation; avoids land disturbance; and will not avoid stormwater entering the water as it must be retained and managed on the development site(s).*

Our comment:

As per our comments for 2.1 Biodiversity, we believe an environmental impact assessment, as for the River Road development, should be conducted for this application.

Although not directly related to waterways, wetlands and estuaries, we have concerns with respect to the hydrology / groundwater system and believe the strategies are not adequate, as the groundwater system is not fully understood due to lack of information provided in the Geotechnical assessment report in terms of monitoring the BH09 well installed in November 2024 – have readings being obtained since installation, and if so, what are the results? And if none have been collected, why not?

3.1 Bushfire – page 9

Objective: *Achieves the Objective to prioritise the protection of human life and to support the resilience of settlements and communities by reducing the potential impacts of bushfire on life, property and infrastructure*

Our comment:

As raised in the hearing on 5th August, there is only one access road for the settlement at Fossil Bluff. This 'one way in / one way out' access poses concern not just for bushfire but for other natural events affecting the accessibility of Golf Links Road for all residing east of the junction with Table Cape Road. Events from June 2016 impacted the accessibility of Golf Links Road in the vicinity of the unnamed creek.

We recommend further, as per our initial representation, that an updated traffic assessment is undertaken for Golf Links Road, not just for general impact on higher traffic that the development will add, but with respect to emergency management with a 'one way in / one way out' access.

3.2 Landslip – page 9

Strategies: *Achieves the Strategies by:*

- *the site is identified and mapped as land that is exposed to risk of landslip.*
- *a landslip hazard report has been prepared in support of the subdivision associated with the proposed rezoning of the site which states that tolerable level of risk from landslip can be achieved for the site.*

Our comment:

We accept the assessment against the AGS 2007 risks however our concern remains regarding “tolerable risk.” There is still deep-seated landslide risk in this area as identified by LIST map. This should be considered further, if development does occur.

Although it is good to state that future development will align with “good hillside practice” but as per our initial representation, how does the planning authority ensure that any development will adhere to the engineering recommendations? Evidence of existing dwellings within this area have already demonstrated this process has not been adhered to and there are recent events (within 10 years) of landslide within the Table Cape area. Council have also shown departure from following process in ignoring that the growth front of Wynyard is River Road, not Lot 2.

Construction costs will also be high for these lots to be developed which limits the affordability of the lots in the housing market, tying in with the Tasmanians needs of lot types as outlined in 1.5 Housing.

Lab testing results indicate one sample with a moisture content of 81.5%. This moisture content in clay significantly exceeds its normal plastic limit and often surpasses its liquid limit, meaning the clay loses its structural strength and behaves like a viscous liquid rather than a solid foundation. As stated, we are concerned for the stability of this land and any development that may be approved and occur.

4.1 – Agriculture – page 11

Objective: *The Objective is to promote a diverse and highly productive agricultural sector by protecting agricultural land and the resources on which agriculture depends, while supporting the long-term viability and growth of the agricultural sector.*

The proposal is somewhat at odds with this Objective in that it seeks to rezone agricultural land for residential purposes. However, agricultural assessment of this land has identified a range of significant constraints and restrictions associated with the site which severely limits current and future agricultural land use potential.

Strategies: *The application partially achieve some of the Strategies by:*

- *Identifying the potential of the agricultural land through a detailed site-specific agricultural assessment that identifies a range of significant constraints.*
- *The land does not have significant agricultural capabilities and is not within an irrigation district.*
- *The land is incapable of supporting meaningful agricultural use in accordance with the findings of the agriculture assessment.*
- *The land is already constrained by establish residential zoning to the east and west. Were the land to be rezoned and developed in the manner proposed, the area fettered by future sensitive use overlaps with existing fettering from established single dwellings along. The potential for increase in constraint beyond that which already existing is negligible and does not extend further into the Agriculture zone north of the site.*
- *The scale of conversion is minor in terms of the local Fossil Bluff/Table Cape area.*

Our comment:

As per our initial representation, no agricultural land should be rezoned and must always be protected, no matter how small it is. There is agricultural land on the northern boundary of this lot which will then potentially have further restrictions placed on if this area is rezoned.

The agricultural land to the northern boundary has grazing on it. The quality of soil can't always be the determination of whether it's valuable or not as agricultural land – the soil would be similar quality north of the northern boundary as it's the same ground

The strategy around conversion is minor to the Table Cape area – is this likely to be the reasoning for further applications as an excuse to develop further? All agricultural land needs to be protected for the future to avoid 'scale' conversion being used in support. What size of land is depicted to state it's okay to rezone? The Local Provisions Schedule in 2022 identified this land as Agriculture and it should remain. The applicant should have placed a representation with respect to rezoning this land 4 years ago. Our view is too late.

7.1 Public Engagement – page 16

Objective: *Achieves the Objective to improve and promote public engagement processes to provide for the community's needs, expectations and values to be identified and considered in land use planning.*

Strategies: *Achieves the Strategies by:*

- *the application process promotes public engagement through the statutory public exhibition process.*
- *the application process promotes public engagement through any subsequent hearing to be held through the statutory process.*

Our comment:

There is already a public engagement process that has occurred for the River Road outline development plan. This application is not required as the community needs will be met with River Road as per the Settlement Strategy. This application and the associated public engagement are unnecessary as the planning authority are not demonstrating following due process as this application 'leap frogs' the work already done towards River Road. The status of River Road has not been publicly provided and therefore does not promote/follow public engagement.

2. Cultural Heritage

We acknowledge the Aboriginal Heritage assessment undertaken as part of the Council's Inglis River Walking Track Project 5 that no artefacts or cultural heritage values were identified. We have no further comment relating to Cultural Heritage.

3. Hazard Code Reporting

We acknowledge the inclusion of the work regarding the Flood Prone Area Hazard Code, the Coastal Inundation Hazard Code and the Coastal Erosion Code and have no objections to the recommendations.

However, we did note the unusual requirement to add the following comment (page 3 and 5):

Ms Foster is an engineering geologist and is a suitably qualified person to undertake a coastal erosion hazard report.

We're not sure why this comment was made, and all qualifications within the applicant team have always been and are still respected. If any interpretation from our representation indicating that we did not consider the qualifications from the planning application, it was not our intention. However, as per our initial representation, we had further requirements for clarification regarding the groundwater

(hydrology) and karstic conditions from the Geotechnical assessment report. These are reiterated and further comments provided in 4. Geotechnical assessment report below.

Andrew and Rachel both have over 20 years' experience in drilling and mining. Andrew's experience includes exploration and blasthole drilling and is currently a mine operator. Rachel's experience is a Geologist in managing exploration, mining and geotechnical drilling programs; and 3D geological modelling both in mining and consultancy work.

4. Geotechnical assessment report

Please refer to our comments below with respect to the investigation findings relating to depth of bedrock (foundation stability/landslide), groundwater/hydrology and karst assessment.

Depth of Bedrock

As stated on page 62, *"In light of the findings of this investigation (topography, shallow depth to bedrock)"* we believe that the depth to bedrock is still undetermined as all boreholes terminated in clay or extremely weathered limestone exhibiting soil like properties as indicated on the borehole logs. Bedrock is defined as the hard, solid layer of rock beneath the loose soil and sand in ground.

Shallow bedrock with respect to landslides is nominally 2 to 5 m. All boreholes did not exceed this depth. BH13 was the deepest at 5.4 m. The average depth of all (19) of the boreholes is 2.31 m.

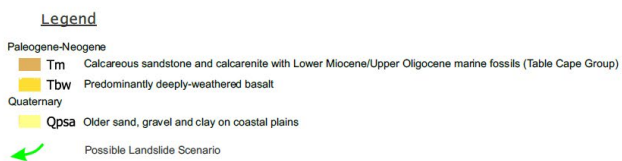
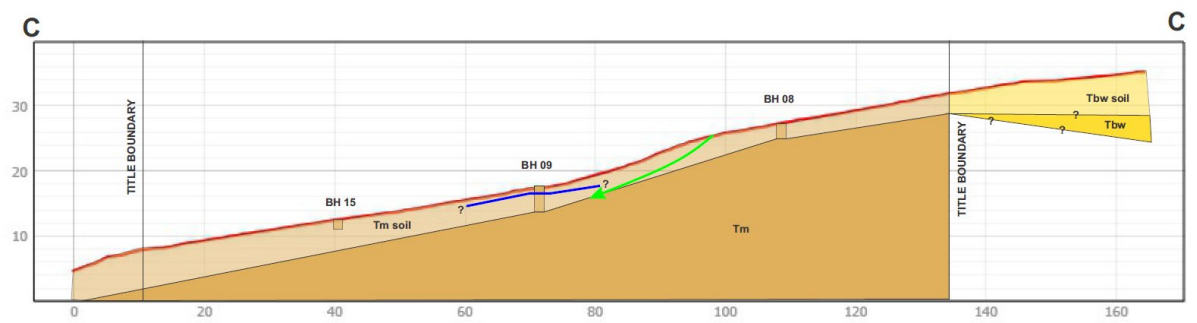
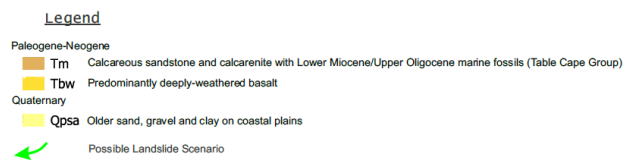
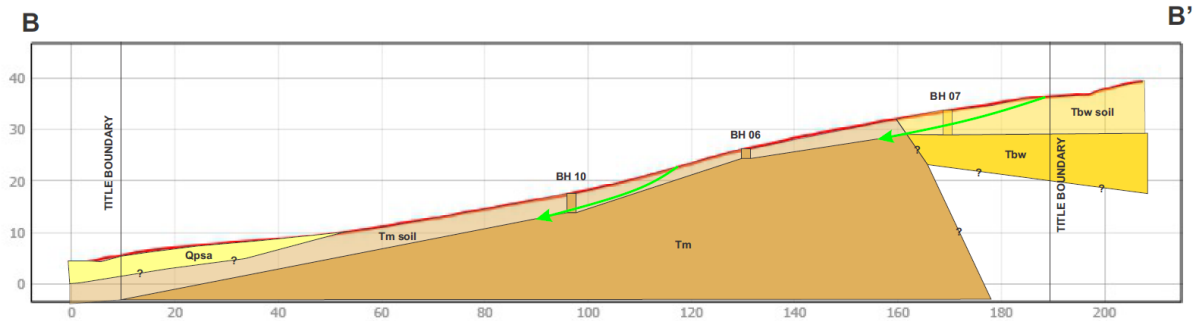
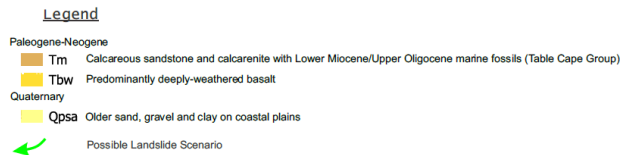
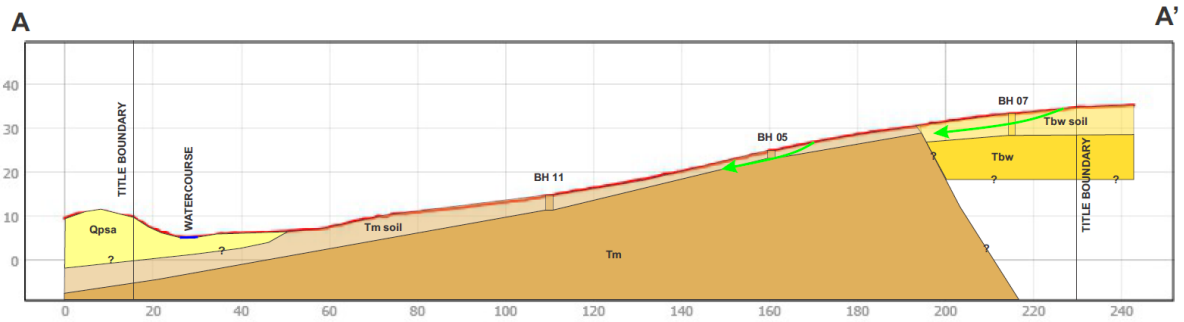
The boreholes that were terminated due to refusal and the comment *"auger refusal on inferred highly weathered basalt or limestone"* is not adequate. Augering can refuse on a cobble/piece of gravel – it does not ultimately determine that refusal defines a less weathered material. Evidence of this, for example, is in BH07 where cobbles are recorded on the log at 4.70 m depth.

Deeper drilling with other drilling methods to augering is recommended to determine the depth of the weathering profile of the bedrock to fully understand the characteristics of the bedrock and overlying soil profile.

Three cross sections, A-A'; B-B'; and C-C' are presented in the report and screen shots presented below. It is clear from the geological model that the base of Tm/Tbw soil coincides with the base of the boreholes purely due to inferring of the soil/bedrock contact with substantiated evidence/data. Green arrows are presented on each cross section indicating possible landslide scenario.

Cross section A-A', (and other two cross sections) illustrates that the southern area of the title boundary was not covered by the drilling investigation - the southern boundary of the title is 70-100 m further. The soil thickness at this southern boundary is undefined. Although this section would not be affected by landslide, the nature of the foundation material is still required to be defined for groundwater/hydrology assessment and any development/construction concerns.

We note that boreholes BH01, BH02, BH13 and BH14 are not shown on the three cross sections but BH01 and BH14 do extend closer to the title southern boundary as per drawings 1 and 2 in the report. Based on the field logs, BH01 and BH02 were terminated at 1.50 m (no refusal noted), BH13 refused at 5.4 m and BH14 terminated at 1.50 m (no refusal noted). All boreholes were still in soil material with only BH13 indicating extremely weathered limestone with trace fossilised shell fragments, indicating that depth of bedrock is near. If BH13 was the defining depth of the top of bedrock, it is inadequate to use 1 borehole out of 19 to define and make the conclusion that the bedrock depth is shallow.



Groundwater / hydrology

Our comments and request for further clarification with respect to the groundwater / hydrology of the land are included in section 2.2 Waterways, wetlands and estuaries.

Cross Section C-C' and BH09 present the possible groundwater depth between 1.10 and 1.80 m below ground level. The implication of this groundwater intersection is on the area downslope is significant. As per our comments in section 2.2, the understanding of the groundwater behaviour and impact to the area is required.

The northern title boundary in Cross Sections B-B' and C-C' indicate a contact between the Tm and Tbw units. Inferred boundaries have been shown on the sections but the contact of the Tertiary basalt over the limestone unit is not defined in terms of depth. This contact can be a conduit for groundwater and being so elevated in the title is of further concern for stability.

Karst Assessment – page 67

Noted that this section, Section 8 has been added from the original report. It is quoted:

It is evident that calcareous sediments (limestone) exist within the site; however, the desktop study and field investigation revealed no evidence of karst formations or systems within the site or surrounds.

It is considered that the proposed development will not cause damage to sites of scientific significance or karst features, will minimise of erosion and prevent sediment and pollution entering the Karst system. It will not increase the potential for ground surface or land instability, subterranean water flow, or significantly alter the surface hydrology.

Therefore, the site is considered to have an ACCEPTABLE level of risk with regard to the Wynyard Karst.

Our comment:

As per our comments for the depth of bedrock with respect to the borehole depths, and the inclusion of screen shots of the three cross sections, how can the site be considered as an acceptable level of risk regarding karsts when the subsurface investigations are not complete as all of the boreholes terminated in soil or material with soil-like properties?

Soil can completely mask underlying karstic features.

As per our initial representation, deeper investigation sites and / or underground surveys are required to fully understand the karst potential of this area.

We appreciate you taking the time to read and consider our response to the planning authority's submission in relation to the proposed subdivision of Lot 2 Golf Links Road.

We would appreciate to continue to receive communications as representor and receive feedback and answers to our queries and concerns.

Yours faithfully,

Andrew and Rachel Arnold

