
From: Justine Brooks <[REDACTED]>
Sent: Wednesday, 29 April 2026 1:53 AM
To: Kingborough LPS
Cc: TPC Enquiry; Julian H; Hugh Clement; Matthew Denholm
Subject: CM: Submission - [REDACTED] Snug - Ireneinc S69 direction response report
Attachments: Submission [REDACTED] Snug - Response to Ireneinc S69 response report
JB290426.pdf

Please find attached correspondence prepared on behalf of Mr Julian Hartman of Strathdale Investments Pty Ltd.

Kind regards

Justine Brooks



Justine Brooks MEnvPlg RPIA
Principal Planning Consultant

Phone: +61 (03) 6331 4099 | Mobile: 0429 201 271
justine.brooks@pda.com.au
PO Box 284, 3/23 Brisbane Street, Launceston TAS 7250

Tasmanian Planning Commission
Via email: kingboroughLPS@Planning.tas.gov.au

Dear Commissioners

Please find enclosed our Further Submission on behalf of Strathdale Investments Pty Ltd in relation to land at [REDACTED], Snug (CT [REDACTED]), known as Snug Beach Caravan Park. This submission is provided in response to the Tasmanian Planning Commission's Further Submission Invitation dated 2 April 2025.

This further submission responds to the findings of the Ireneinc Review of the LCZ prepared in response to Direction 69 and considers the implications of that review for the subject land. In summary, the submission confirms and refines the position previously put on behalf of the landowner, namely that the Low Density Residential Zone remains the most appropriate zone for [REDACTED], Snug.

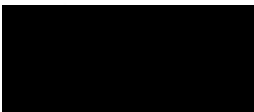
The submission demonstrates that:

- the subject land is an established and operational caravan park within an existing settlement context;
- the primary strategic intent of the land is visitor accommodation, not landscape conservation;
- the Landscape Conservation Zone is not the appropriate default translation of former Environmental Living land;
- the Ireneinc review reinforces that alternative zones must be properly tested and that landscape values alone should not determine zoning outcomes; and
- the Low Density Residential Zone provides the most coherent and defensible planning outcome, with relevant environmental and coastal constraints more appropriately managed through the applicable codes and overlays.

For these reasons, the submission respectfully requests that the Commission apply the Low Density Residential Zone to [REDACTED], Snug, with a site-specific qualification if considered necessary to regulate the ongoing operation of the caravan park and preserve the integrity of that outcome.

Please do not hesitate to contact me should the Commission require any further information or clarification.

Yours sincerely



Justine Brooks RPIA GTLP
Principal Consulting Planner MEnvPlg MBA
PDA Surveyors Engineers and Planners

FURTHER SUBMISSION

Tasmanian Planning Commission Kingborough Draft Local Provisions Schedule Further submission

Land at [REDACTED], Snug (CT [REDACTED]) Snug Beach Caravan Park
Representor: Strathdale Investments Pty Ltd

1. Introduction

This further submission responds to the Tasmanian Planning Commissions Further Submission Invitation dated 2 April 2025. It relates to land at [REDACTED] Snug, known as Snug Beach Caravan Park.

The purpose of this further submission is to:

- respond to the findings of the Ireneinc *Review of the LCZ Kingborough Council* prepared in response to Direction 69;
- identify the findings of that review relevant to [REDACTED], Snug;
- restate and refine the planning basis of the earlier submission made on behalf of the landowner; and
- confirm the most appropriate zone for the subject land. This is having regard to the Section 8A Guidelines, the sites established use and development pattern, the Southern Tasmania Regional Land Use Strategy (STRLUS), and the practical operation of the Tasmanian Planning Scheme.

For the reasons set out below, this submission maintains that the Low Density Residential Zone (LDRZ) is the most appropriate zone for [REDACTED], Snug.

The Ireneinc review supports that outcome.

2. The Subject Land

The land at [REDACTED], Snug is a privately owned freehold title (CT [REDACTED]) comprising approximately 1.85 hectares and occupied by the long-established Snug Beach Caravan Park.

The site is a fully established and operational caravan park containing:

- visitor accommodation,
- cabins,
- camping areas,
- internal access roads,
- visitor facilities,
- established services infrastructure,
- a manager's dwelling, and
- associated operational works and improvements.

The site has operated for decades as a caravan park and is characterised by built form, managed visitor accommodation, internal infrastructure and an established tourism function. It is developed and serviced, within an existing settlement context.

Accordingly, the key planning issue is ensuring that zoning and applicable overlays reflect and manage the existing use and development pattern. It is not about applying a conservation-focused zone that is inconsistent with the sites established function.

2.1 Section 8A Guideline context (LCZ and LDRZ)

Guideline No. 1 issued under section 8A of the *Land Use Planning and Approvals Act 1993* provides that the Landscape Conservation Zone (LCZ) is intended for land where landscape values are identified for protection and conservation, and where the primary intention is protection of those values. It also makes clear the LCZ is not a replacement zone for the former Environmental Living Zone.

In contrast, Guideline No. 1 states the purpose of the Low Density Residential Zone is:

“The purpose of the Low Density Residential Zone is:

10.1.1 To provide for residential use and development in residential areas where there are infrastructure or environmental constraints that limit the density, location or form of development.

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

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

Applied to this site, the established and lawful use (caravan park/visitor accommodation), developed character, and settlement context indicate that protection and conservation of landscape values is not the primary strategic intent of the land. Any coastal and environmental constraints are better addressed through the relevant scheme codes and overlays. The underlying zone should reflect the sites settlement-based use and development pattern. On that basis, the LDRZ is the appropriate zoning response.

3. What Our Earlier Submission Requested

The earlier submission sought application of the Low Density Residential Zone in place of the exhibited Landscape Conservation Zone.

That submission argued, in summary, that:

1. the site is already developed and in active use as a caravan park;
2. the site is not characterised by the kind of dominant landscape or conservation values contemplated by the LCZ;
3. the site is surrounded by urban and settlement-based zoning outcomes, including low density residential, open space and recreation;
4. the primary strategic intent of the land is not conservation, but ongoing visitor accommodation;
5. the LDRZ better reflects the sites established built form, surrounding settlement pattern, infrastructure servicing, visitor accommodation function, and long-term planning intent;
6. coastal and environmental constraints are appropriately managed through the applicable codes and overlays, rather than through inappropriate zone application; and
7. if required, a site-specific qualification can ensure no subdivision, no separate title, no residential creep, and no increase in development intensity beyond the approved and lawful use.

That remains the correct planning position.

4. What the Ireneinc Review Says (and Why It Matters)

The Ireneinc review is important because it reinforces that the LCZ must be applied with precision and consistency. It should not be used as a default replacement for former Environmental Living Zone land. The review also emphasises the need to test alternative zones. It asks whether identified values can be managed through other scheme mechanisms (including codes and overlays).

Its core findings are directly relevant to [REDACTED]

4.1 The LCZ is not a default replacement for ELZ

The Ireneinc review confirms the Section 8A Guideline position that the LCZ is not intended to operate as a blanket replacement for the former Environmental Living Zone.

The review expressly confirms:

- Environmental Living Zone land does not automatically translate to the LCZ;
- the LCZ is appropriate where protection and conservation of landscape values is the primary intention;
- zoning should be informed by locality, settlement pattern and strategic function; and

- alternative zones should be tested and applied where they better achieve the zone purpose and planning outcomes.

That directly supports the position advanced in the earlier submission.

The subject land should not have been translated to LCZ merely because it was previously within the Environmental Living Zone.

4.2 Landscape values alone should not determine zoning

One of the most important findings of the Ireneinc review is that landscape values alone should not determine zoning outcomes.

The review expressly states that:

landscape values alone should not determine zoning outcomes rather it should inform whether those values can be appropriately managed through available zones and codes.

Accordingly, the appropriate question is whether any identified values require the LCZ as the primary zoning response, or whether those values can be managed through other zones together with relevant codes and overlays. For this established caravan park, the latter applies.

That finding strongly supports the position that LCZ does not need to apply to [REDACTED] simply because the land is coastal or has environmental constraints.

In this case, relevant constraints can be managed through the applicable scheme controls (as relevant to mapped overlays), including the Coastal Erosion Hazard Code, Coastal Inundation Hazard Code, and Natural Assets Code. Those controls address the relevant risks without requiring an LCZ outcome for an established settlement use.

4.3 Alternative zones must be properly tested

A central criticism in the Ireneinc review is that Council did not adequately test alternative zones before applying LCZ. The review found:

- Council's methodology was inconsistent,
- LCZ application had become piecemeal,
- alternative zones were not comprehensively tested,
- RLZ and other alternatives were not properly evaluated,
- Council took an overly conservative approach to risk.

That criticism directly supports the representor's original objection.

The earlier submission did what the Ireneinc review says should have been done in the first place. It tested the suitability of the land against the available zones. It also explained why the LDRZ is the best fit.

4.4 The Ireneinc review expressly records Representation 174 and the requested zone

The Ireneinc review specifically records Representation 174 [REDACTED] Snug) and notes:

"Rep 174 ([REDACTED], Snug) – Rep oppose the proposed LCZ and requested that the property be zoned as Low Density Residential, as it aligns with its established use as a fully developed caravan park and complies with Section 8A Guidelines."

That summary is accurate.

Importantly, Ireneinc did not dismiss that position.

It records it as a live alternative zoning position to be considered within the revised evaluation framework.

5. Why LCZ Remains the Wrong Zone

The LCZ remains inappropriate for [REDACTED] for the following reasons.

5.1 The land is not primarily intended for conservation

The primary strategic intent of the land is visitor accommodation in the form of an established caravan park. It is not land where protection and conservation of landscape values is the primary intention for zoning purposes.

5.2 The site is already developed and its landscape values are already modified

The earlier submission correctly observed that:

- the site is developed and occupied by lawful buildings and infrastructure associated with an operational caravan park;
- the site is managed and substantially modified to support visitor accommodation, including internal roads and serviced areas; and
- the sites character is materially different from the types of bushland or native-vegetation landscapes contemplated by the LCZ purpose and application guidelines.

That is fundamentally inconsistent with the planning purpose of the LCZ.

5.3 LCZ creates an unnecessary planning conflict

Applying LCZ to an established caravan park creates a zone-use conflict between:

- the actual use of the land,
- the strategic purpose of the zone, and
- the planning controls intended to apply.

This creates an unnecessary conflict between the zone purpose and the sites established function.

Applying the LDRZ avoids that zone-purpose conflict while allowing relevant constraints to be managed through the schemes codes and overlays.

5.4 The environmental risks are already managed elsewhere

The GES Coastal Vulnerability Assessment did not conclude the land should be prevented from continuing to be used. It concluded development could proceed subject to siting, design and mitigation responses.

That is a code response, not a zoning prohibition response.

The planning scheme already contains the tools to manage those risks.

The LCZ is not required to do that work.

6. Why the Low Density Residential Zone is the Best Fit

The LDRZ remains the most appropriate zone because it:

- better reflects the established settlement context and serviced nature of the site;
- is consistent with a low-intensity settlement outcome where constraints may limit the form and location of development;
- appropriately accommodates visitor accommodation as an established and compatible function; and
- allows coastal and environmental constraints to be managed through the relevant codes and overlays, without creating a zone-purpose conflict.

This is a clear and workable planning outcome, and it is consistent with the Section 8A Guidelines.

7. Preferred Planning Outcome

The Commission should:

1. reject the exhibited Landscape Conservation Zone for 35 Beach Road, Snug;
2. apply the Low Density Residential Zone to the subject land; and
3. if considered necessary, apply a site-specific qualification to confirm the land remains visitor accommodation in the form of a caravan park.

That qualification could also prevent subdivision or a separate title, prevent residential creep, avoid increased development intensity, preserve the lawful and established caravan park use, and retain operation of the relevant hazard and environmental codes.

That outcome is consistent with:

- the actual character of the land,

- the Section 8A Guidelines,
- the Ireneinc review findings,
- the planning scheme framework, and
- sound strategic planning.

8. Conclusion

The Ireneinc review supports the representors longstanding position that the Landscape Conservation Zone is not the appropriate zone for [REDACTED] Snug.

The site is not an undeveloped coastal landscape where conservation is the primary strategic intent.

It is an established, developed, privately owned caravan park within the Snug settlement.

- The land is already developed and functioning as visitor accommodation.
- Its strategic role and land use are established within a settlement context.
- Its environmental constraints can be managed through the relevant scheme codes and overlays.

For these reasons, we propose that the most appropriate zone is the Low Density Residential Zone.

The Commission is respectfully requested to apply the Low Density Residential Zone to [REDACTED], Snug. A site-specific qualification can also be applied, if considered necessary, to regulate the ongoing operation of the caravan park and preserve the integrity of that outcome.