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6 August 2019

General Manager
 Central Coast Council

Sent by email to: admin@centralcoast.tas.gov.au

Dear Sandra

2 HOBBS PARADE, ULVERSTONE

PDA Surveyors act for BL & SC Howard in the lodgement of this representation to the Central Coast Council, concerning land at 2 Hobbs Parade, Ulverstone. Please find enclosed the following documentation:

- Folio text and plan for 156432/1;
- Plan of Future Subdivision
- Plans and elevations by Cradle Coast Building Design;
- Letter from ES&D regarding inundation risk dated 7 February 2017;
- Detail survey plan by PDA Surveyors.

The lot is currently in the Open Space Zone of the Interim Scheme and is proposed to be within the Open Space Zone of the forthcoming Scheme. It is considered that the lot ought to be located within the General Residential Zone of the forthcoming Scheme because there is no significant reason to retain the lot for open space purposes. The lot provides an opportunity for appropriately located for urban infill development and it is considered that a rezoning to the General Residential Zone would meet the requirements of the *Land Use Planning and Approvals Act 1993*.

The lot has a land area of 758m², located on the corner of Hobbs and Tasma Parade. It is currently owned by the Crown but there is agreement from the Crown to sell 400m² of the lot to BL & SC Howard for consolidation with the adjoining title (CT157857/6). The remainder of the lot is intended to form part of the Hobbs and Tasma Parade road reservations and be transferred into Council's ownership. Council was a party to consultations regarding the extent of land that it requires for road purposes and the final agreed layout is represented on the attached plan marked 43833-3.

A plan of subdivision numbered 43833-2 has been prepared to demonstrate the potential use of the site and the adjoining site to the south-east for residential purposes should there be a rezoning. A development application has also been lodged with the Central Coast Council for a dwelling on the adjoining lot to the south-east (see attached site plan numbered 43833-1). The dwelling's design and siting accommodates a future rezoning and subdivision of the land in accordance with 43833-2.

Please note that this request involves land that is currently owned by the Crown. Permission from the Crown to the rezoning is unlikely to be available by the closing date for submissions. It is considered that this does not preclude full consideration of the merit of the representation. Should Council agree with the suggested actions in this representation, it could provide its support to the Tasmanian Planning Commission subject to the Crown's consent being granted prior to the Planning Commission hearings and determinations.

THE SITE

The lot generally slopes downward towards the Leven River. It is developed with part of the trafficable road of Tasma Parade, part of the Tasma Parade footpath and unmanaged grass on the remainder. A small sign, advertising a local business exists on the north-west corner. Beneath the ground is part of

OFFICES ALSO AT:

- | | | | |
|--|----------------|-------------------------------------|----------------|
| • 6 Queen Street, Burnie, 7320 | (03) 6431 4400 | • 127 Bathurst Street, Hobart, 7000 | (03) 6234 3217 |
| • 16 Emu Bay Road, Deloraine, 7304 | (03) 6362 2993 | • 6 Freeman Street, Kingston, 7050 | (03) 6229 2131 |
| • 3/23 Brisbane Street, Launceston, 7250 | (03) 6331 4099 | • 8/16 Main Road, Huonville 7109 | (03) 6264 1277 |

the reticulated water supply network servicing the local area. The site can be accessed from an existing driveway off Tasma Parade.

25m to the south-west is Tobruk Park. It is 1.371ha of open space located on the foreshore of the Leven River with parking areas, toilets, multiple seats, tables, barbeque, shelter, gardens and tree plantings. 95m north is Airforce Park. Airforce Park is 2927m² of open space also located on the Leven River foreshore and is mostly known for the commemorative statue, seating, shelter and barbeque facilities.

LAND USE PLANNING AND APPROVALS ACT 1993 CONSIDERATIONS

Section 34(2) of the Land Use and Planning Approvals Act 1993 requires that the relevant planning instrument –

- (a) contains all the provisions that the SPPs specify must be contained in an LPS; and
- (b) is in accordance with section 32; and
- (c) furthers the objectives set out in Schedule 1; and
- (d) is consistent with each State policy; and
- (e) is consistent with the regional land use strategy, if any, for the regional area in which is situated the land to which the relevant planning instrument relates; and
- (f) is consistent with the strategic plan, prepared under section 66 of the Local Government Act 1993, that applies in relation to the land to which the relevant planning instrument relates; and
- (g) as far as practicable, is consistent with and co-ordinated with any LPSs that apply to municipal areas that are adjacent to the municipal area to which the relevant planning instrument relates; and
- (h) has regard to the safety requirements set out in the standards prescribed under the Gas Pipelines Act 2000.

Each is addressed in turn:

Objectives - Schedule 1, Part 1

The objectives of LUPAA specified in Schedule 1 and a response to those objectives follows:

- (a) to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity;*

Response: The proposed rezoning would facilitate residential infill development that utilises existing services in a typically sustainable manner. It is unlikely to materially impact on ecological process and genetic diversity of the site or the local area.

- (b) to provide for the fair, orderly and sustainable use and development of air, land and water;*

Response: Future residential infill development would be a logical and orderly consolidation of the existing suburban area.

- (c) to encourage public involvement in resource management and planning;*

Response: The proposed rezoning is unlikely to impact on the public at large and unlikely to generate much public interest. Any input from the public exhibition process will be considered and appropriately responded to. It is not considered that any further public involvement is necessary.

- (d) to facilitate economic development in accordance with the objectives set out in paragraphs (a), (b) and (c);*

Response: The land is surplus to the needs of the Crown. It is unlikely that it would be developed in a manner consistent with the Open Space Zone. Therefore, rezoning is likely to precede any economic development of the site.

- (e) to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.*

Response: The application is submitted with the intention that it is be assessed according to the shared responsibilities between State government, local government and the community.

Objectives - Schedule 1, Part 2

The objectives of LUPAA specified in Part 2 of Schedule 1 and a response to those objectives follows:

- (a) to require sound strategic planning and co-ordinated action by State and local government;*

Response: As detailed below, the proposed amendment is reasonably consistent with State policies, the Cradle Coast Regional Land Use Strategy and the Council's strategic planning instruments.

- (b) to establish a system of planning instruments to be the principal way of setting objectives, policies and controls for the use, development and protection of land;*

Response: It is considered that the Council and the Tasmanian Planning Commission can appropriately assess and determine this amendment within the current system of planning instruments.

- (c) to ensure that the effects on the environment are considered and provide for explicit consideration of social and economic effects when decisions are made about the use and development of land;*

Response: The proposed rezoning is unlikely to cause an adverse economic or impact on an environmental value that would be significantly different than that which could occur under the current zoning.

- (d) to require land use and development planning and policy to be easily integrated with environmental, social, economic, conservation and resource management policies at State, regional and municipal levels;*

Response: State, regional and municipal policy objectives are discussed below. Integrating such objectives is simpler in this instance because of the general acceptance of urban consolidation policies at all levels.

- (e) to provide for the consolidation of approvals for land use or development and related matters, and to co-ordinate planning approvals with related approvals;*

Response: The existing and applicable planning approvals process is to be applied to this application.

- (f) to secure a pleasant, efficient and safe working, living and recreational environment for all Tasmanians and visitors to Tasmania;*

Response: The proposed amendment furthers the State and municipal objectives of sustainable economic development of land in a manner that does not compromise environmental, social, conservation or resource management values. Reporting on coastal vulnerability is included with this submission, which indicates that an acceptable level of risk in relation to coastal erosion and inundation can be achieved.

This is consistent with providing a pleasant, efficient and safe living environment.

(g) to conserve those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value;

Response: The site is not identified as being subject to Aboriginal Heritage. In the event that any values are identified, the provisions of the Aboriginal Relics Act 1975 would be followed. There are no national, state or local heritage values identified on the site.

(h) to protect public infrastructure and other assets and enable the orderly provision and co-ordination of public utilities and other facilities for the benefit of the community;

Response: The proposed rezoning would enable orderly infill residential use and development on a site that is not strategically required or desirable for community use.

(i) to provide a planning framework which fully considers land capability;

Response: The land has no significant agricultural value and therefore the proposed amendment does not conflict with the intent of the PAL Policy 2000.

STATE POLICIES

State Policy on the Protection of Agricultural Land 2009 (PAL Policy)

The PAL Policy applies to Agricultural land. "Agricultural land" means all land that is in agricultural use or has the potential for agricultural use, that has not been zoned or developed for another use or would not be unduly restricted for agricultural use by its size, shape and proximity to adjoining non-agricultural uses. The land is not zoned for agriculture and is unsuitable for agriculture and hence the PAL policy does not apply.

State Policy on Water Quality Management 1997

The existing system of planning, building and plumbing approvals is relied upon to ensure that storm-water from all hard surfaces including roofs and driveways was collected and diverted to the reticulated system in a manner that is consistent with all current standards, including the State Policy on Water Quality Management 1997.

Tasmanian State Coastal Policy 1996

The lot is 500m from the high water mark of the Leven River and therefore the State Coastal Policy applies.

The lot would be located within the Low and Medium risk band coastal erosion. In response to these risks, it is noted that a sea wall and footpath infrastructure, recently constructed along the banks of the Leven River, provide significant protection from erosion. The lot is also separated from the Leven River by a residential allotment. In these circumstances, it is considered that the rezoning is consistent.

The site would be located within the Low and Medium risk band coastal inundation. A report by GHD (a copy was submitted with the original subdivision file SUB2008.2) and subsequent letter from ES&D (enclosed) provides a reasonable basis for determining that the site would not be at risk of inundation provide the recommended measures within those reports are adhered to. In these circumstances, it is considered that the rezoning is consistent with the policy.

The coastal ecosystems including the native flora and fauna habitats that may have been present on the site have been lost to many years of settlement and urban activity.

No significant change to the existing residential settlement pattern is proposed. Hence, all subsequent development of the site would be consistent with the policy of avoiding ribbon development and unrelated cluster developments along the coast.

On this basis, there is no contradiction or inconsistency with the State Coastal Policy 1996.

National Environment Protection Measures

Section 6(5) Planning and Development of the National Environment Protection (Assessment of Site Contamination) Measure 1999, requires:

Authorities of participating jurisdictions (at local and State government level) that consent to developments, or changes in land use, should ensure a site that is being considered for development or a change in land use, and that the authorities ought reasonably know if it has a history of use that is indicative of potential contamination, is suitable for its intended use.

The proposed rezoning would facilitate the introduction of a use that is sensitive to contamination. However, there is no recorded use of the site for a potentially contaminating activity and no known history of use that is indicative of potential contamination. No contamination is apparent on the site and hence, there is nothing to indicate that the site is unsuitable for its intended use.

REGIONAL LAND USE STRATEGIES

The Cradle Coast Regional Land Use Planning Strategy 2010 - 2030

The CCRLUS emphasises the need for housing options that are well located within serviced, attractive, functional and safe environments. It supports priority for better use of the land already designated and serviced for urban use before advancing options for expansion in settlement boundaries and new green-field development (pages 82, 85)

The Land for Housing strategy of the CCRLUS is based on an expectation that new housing demand continues as household size continues to decline, and alternate housing options are sought. It also identifies a continuing demand for quality housing options to meet needs of the financially independent, including retirees (pages 84, 87).

The strategic outcomes for liveable and sustainable communities identified at page 144 are:

- The growth and development of centres is contained to create functional places which optimise use of land and infrastructure services and minimise adverse impact on resources of identified economic, natural or cultural value;
- The pattern of settlement provides a network of compact, well connected and separate centres each with individual character and identity;
- Land supply is matched to need and there is a balance of infill and expansion;
- There is coordinated and equitable access to provision of regional level services;
- Each settlement provides an appropriate level of local development and infrastructure facilities to meet locally specific daily requirements in employment, education, health care, retail, and social and recreation activity for its resident population;
- Each settlement provide a healthy, pleasant and safe place in which to live, work and visit;
- There is diversity and choice in affordable and accessible housing;
- People and property are not exposed to unacceptable levels of risk;
- Transport, utility and human service infrastructure is planned and available to meet local and regional need;
- Energy and resource efficiency is incorporated into the design, construction and operation of all activities.

The proposed rezoning is unlikely to significantly impact on whether these outcomes are met at a regional level. Nevertheless, it would positively contribute towards this outcome by facilitating infill development for residential use that is in reasonably close proximity to schools, employment opportunities, health care, retail, public transport and social and recreation activity.

The lot is located within Ulverstone's urban residential area and is surrounded on all sides by the General Residential Zone. It can be accessed from an existing driveway off Tasma Parade. It is serviced with reticulated water, sewer, stormwater and electricity. At least 400m² of the lot provides suitable circumstances for residential use and development.

There are no unmanageable hazards present on the site that would place human life or property at unacceptable risk. On this basis, it is considered that the proposed rezoning would facilitate liveable and sustainable residential development that would be consistent with the strategic outcomes of the CCRLUS.

LOCAL LAND USE STRATEGIES

Central Coast Strategic Plan 2014-2024 (Reviewed 2019)

The most relevant aspects of the Strategic Plan are contained within Strategic Direction 1 - The Shape of the Place.

It provides as follows:

When planning for a vibrant and liveable place, it is important to focus on its shape – planning, precincts, open spaces, the physical environment and augmenting these to highlight the distinctiveness of Central Coast.

The key strategies and key actions found within Strategic Direction 1 includes improvements to the value and use of open space. It provides a list of open spaces for improvement. The subject site is not within this list and does not have the attributes of other sites within the list.

On this basis, there is no foreseeable use of the site that would further the key strategies and key actions of Strategic Direction 1.

Strategic Direction 1 of the Strategic Plan refers to a Central Coast Settlement Strategy as key related plan but at the time of preparing this submission, this plan was unavailable for viewing. It is considered that the Central Coast Settlement Strategy is likely to recommend appropriate urban consolidation and appropriately developed and located open space. It is considered that the proposed rezoning would support these objectives for the reasons previously explained.

Central Coast Open Space & Recreation Plan 2012-2022

The Zone purpose of the Open Space Zone of the forthcoming Scheme is as follows:

29.1 Zone Purpose

The purpose of the Open Space Zone is:

29.1.1

To provide land for open space purposes including for passive recreation and natural or landscape amenity.

29.1.2

To provide for use and development that supports the use of the land for open space purposes or for other compatible uses.

The Central Coast Open Space & Recreation Plan 2012-2022 (CCOSRP) was prepared in order to provide direction for the planning and management of Central Coast's open space network, including all recreational and sporting open spaces for the ten year period from 2012 to 2022. The CCOSRP details how the Council will continue to meet the community's needs and expectation for public open space in both quantity and quality.

The subject lot is not included within the supply of land for open space in the CCOSRP. Airforce Park is included as Local Open Space. Local Open Space nominally provide open space opportunities for local residents within 400m. Tobruk Park is included as District Open Space and is further categorised as Parklands. District Open Space would nominally provide open space opportunities for the district and residents within 800m. The subject lot falls well within the catchment area of both of these open space areas.

The CCOSRP did not identify any gaps in the provision of open space in the vicinity of the site and given the proximity of Airforce Park to the north and Tobruk park to the south-west, it is unlikely that the removal of this land from the Open Space Zone would have any significant impact on the strategy for the supply of open space for the municipality. It is noted that the Council had no objection to the sale of the site to BL & SC Howard and presumably Council considered these matters prior to giving this advice.

The CCOSRP does not appear to contain any recommended actions involving the lot nor an indication that Council place any strategic value on the subject site in the provision of open space for the community. The useable area of the lot is of insufficient size to provide for meaningful open space use. There are no improvements to the lot such as swings or seats and no grass cover.

Based on the above, the strategic merit in retaining the site for open space purposes is minimal.

Amendment Co-Ordinated With Adjacent Municipal Areas

The closest municipal boundary is Devonport City Council at least 7.5km to the east. The impacts of the rezoning are unlikely to have any impact outside the immediate area.

Gas Pipelines Act 2000

The infrastructure corridor containing the gas pipeline is located approximately 4km south of the site. The proposed rezoning would not have any impact on the safety requirements of the Gas Pipelines Act 2000.

Conclusion

There is minimal strategic advantage in retaining the land for open space uses and relatively positive urban consolidation benefits of residential infill and therefore it is considered that the General Residential Zone would realise the highest and best use of the land from a community perspective. Given the extent of dealings between Council, the Crown and BL & SC Howard in furtherance of a sale of 400m² this land into private hands, it is considered appropriate that the draft LPS is amended so that the site is located in the General Residential Zone.

If you have any questions please contact me on 6423 6875.

Yours sincerely

PDA Surveyors

per:



Tom Reilly

SEARCH OF TORRENS TITLE

VOLUME 156432	FOLIO 1
EDITION 1	DATE OF ISSUE 03-Sep-2009

SEARCH DATE : 30-Jul-2019

SEARCH TIME : 04.03 PM

DESCRIPTION OF LAND

Town of ULVERSTONE

Lot 1 on Plan 156432 (Section 27A of the Land Titles Act.)

Derivation : Whole of Lot 1 on Plan 156432 Gtd. to The Crown

SCHEDULE 1

C924663 APPLICATION: THE CROWN

SCHEDULE 2

C924663 Land is limited in depth to 15 metres, excludes minerals and is subject to reservations relating to drains sewers and waterways in favour of the Crown

UNREGISTERED DEALINGS AND NOTATIONS

No unregistered dealings or other notations

<p>OWNER: The Crown</p> <p>FOLIO REFERENCE: SEC. 27A APP^N (C 924663) (P.156432)</p> <p>GRANTEE: Whole of Lot 1 758m² the Crown</p>		<p>PLAN OF TITLE</p> <p>LOCATION</p> <p>TOWN OF ULVERSTONE</p> <p>FIRST SURVEY PLAN No 332/35 LO</p> <p>COMPILED BY OFFICE OF THE SURVEYOR-GENERAL</p> <p>SCALE 1:400 LENGTHS IN METRES</p>		<p>REGISTERED NUMBER</p> <p>P156432</p> <p>APPROVED EFFECTIVE FROM 24 AUG 2009</p> <p><i>Alice Kawa</i> Recorder of Titles</p>	
<p>MAPSHEET MUNICIPAL CODE No 104 (4244) (4243)</p>	<p>LAST UPI No 6302855</p>	<p>LAST PLAN 332/35 No & P4818 LO</p>	<p>ALL EXISTING SURVEY NUMBERS TO BE CROSS REFERENCED ON THIS PLAN</p>		

COMPILED PLAN

NOT EXAMINED

Lot 1
758m²

Lot 2
(P4818 L.O.)

TASMA PARADE

HOBBS PARADE

PUBLIC RESERVE
(B5/35 L.O.)

(D104952)

(P1196 L.O.)

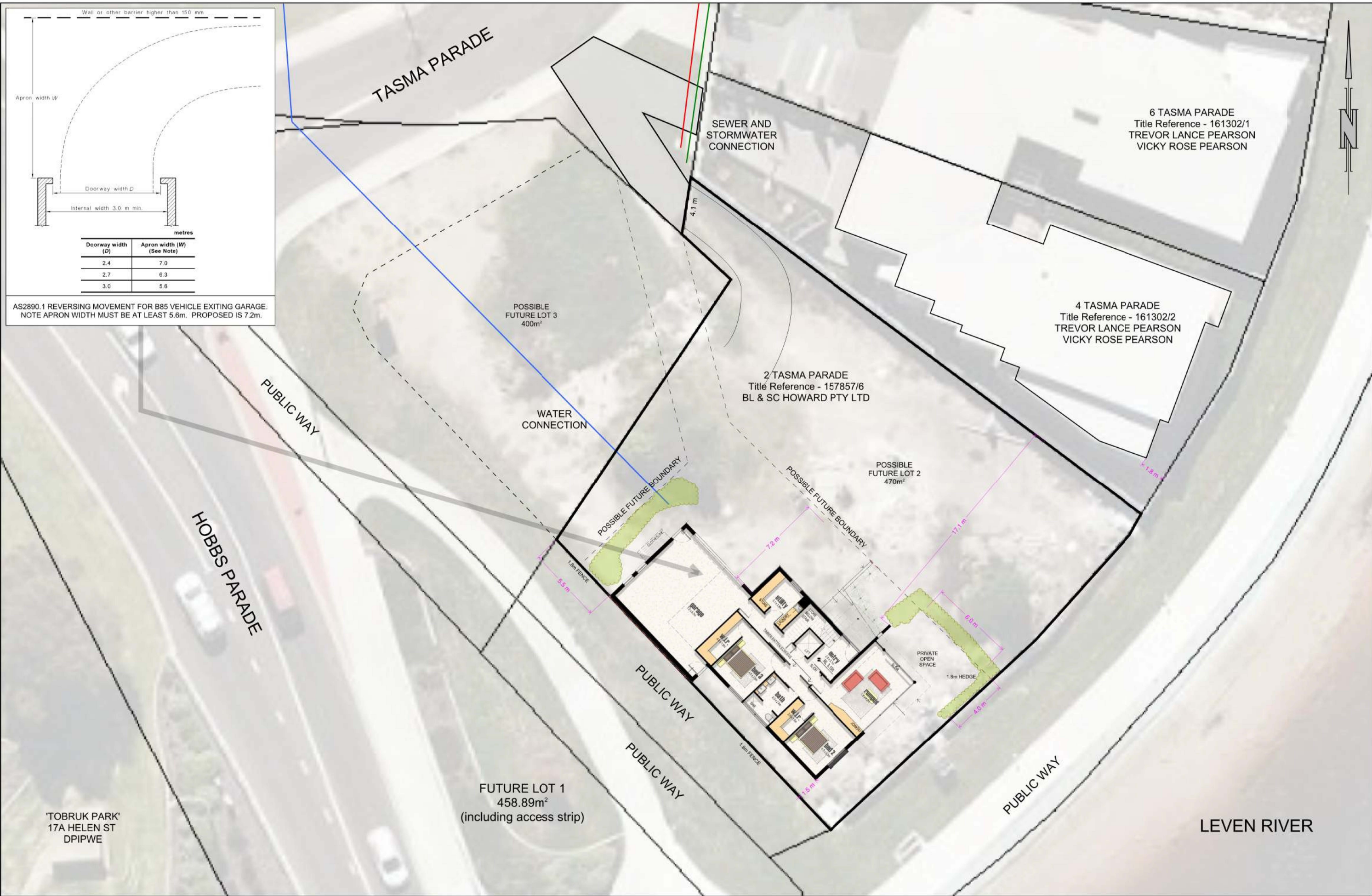
(D15923)

081135

Compiled from 332/35 L.O. & P4818 L.O.

N/A

COUNCIL DELEGATE DATE



Wall or other barrier higher than 150 mm.

Apron width W

Doorway width D

Internal width 3.0 m min.

metres

Doorway width (D)	Apron width (W) (See Note)
2.4	7.0
2.7	6.3
3.0	5.6

AS2890.1 REVERSING MOVEMENT FOR B85 VEHICLE EXITING GARAGE. NOTE APRON WIDTH MUST BE AT LEAST 5.6m. PROPOSED IS 7.2m.

E				
D				
C				
B				
A				
REV	AMENDMENTS	DRAWN	DATE	APPR.

NOTES:

ALL MEASUREMENTS ARE SUBJECT TO FINAL SURVEY

SURVEYOR: GEO/CIVIL

DRAWN: TR

CHECKED:

DATE: 6 AUG 2019

SITE PLAN

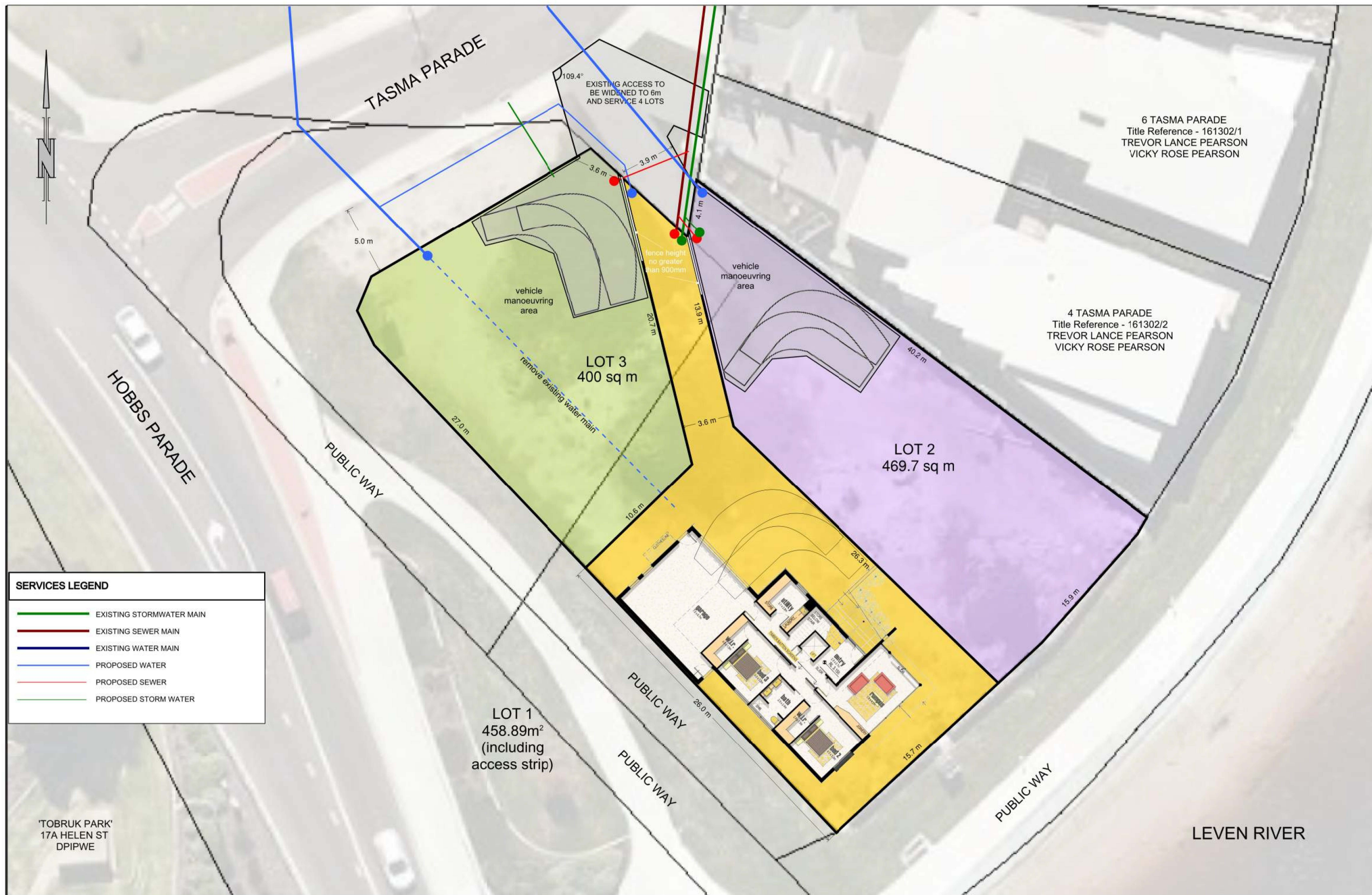
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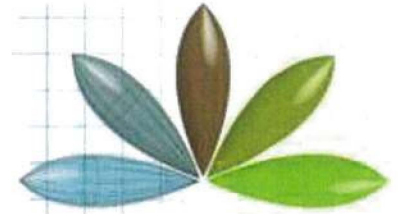
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JOB NUMBER	DRAWING
43833 - 1	



E					NOTES: ALL MEASUREMENTS ARE SUBJECT TO FINAL SURVEY	SURVEYOR		GEOCIVIL	PLAN OF POSSIBLE FUTURE SUBDIVISION (WITH DWELLING)	 PDA Surveyors Surveying, Engineering & Planning 63 Don Road Devonport, Tasmania, 7310 www.pda.com.au Also at: Hobart, Launceston & Burnie ABN 71 217 806 325 PHONE: +61 03 6423 6875 EMAIL: pda.dpt@pda.com.au	SCALE	PAPER
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Environmental Service & Design

ABN: 97 107 517 144



7 February 2017

Central Coast Council
19 King Edward Street
Ulverstone, Tasmania 7315

Dear Sir,

RE: COASTAL VULNERABILITY REVIEW IN RELATION TO CT 157857/4 – 8 TASMA PARADE, WEST ULVERSTONE

Environmental Service and Design Pty Ltd (ES&D) were asked by Craftsman Homes (John Beswick) of 56 Alexandra Road, Ulverstone, Tasmania, 7315, to provide an opinion as to whether the findings provided in a previously submitted Coastal Vulnerability Report prepared by GHD Pty Ltd, "*Central Coast Council; Report for 1 Tasma Street, Ulverstone; Coastal Vulnerability Report; May 2008*" (GHD) pertaining to the former Waterfront Inn site (formerly 1 Tasma Parade, West Ulverstone) remains valid for assessment of similar risks in relation to 8 Tasma Parade, West Ulverstone (CT reference 157857/4), which was subdivided from the Waterfront Inn site subsequent to the report date. The land owners intend to submit a Development Application (DA) for construction of a residential dwelling on the site. Plans for the proposed development were also provided to ES&D for the purposes of the review.

The GHD report was reviewed and assessed with respect to current sea level and storm surge predictions and the likely implications for the property. ES&D cannot accept any responsibility for the interpretations of that report.

Results of recent modelling have been provided on the Land Information System Tasmania (the LIST) by the Department of Premier and Cabinet (DPAC) (derived from *M.J. Lacey, (2016) Coastal Inundation Mapping for Tasmania -Stage 4. Report to the Department of Premier and Cabinet by University of Tasmania*) and this information has been considered in the review (Lacey 2016).

The data provided in the GHD report for the subdivision of 1 Tasma Street aligns with current modelling predictions and therefore is applicable for use. The potential high water level (mAHD=metres Australian Height Datum) for a 1% AEP (annual exceedance probability) flood is 1.72m AHD, with a potential 1% AEP storm surge high water level of 2.667m AHD by 2100. It is noted that the approximate lifetime of the building is 50 years.

The old sea wall on the eastern side was of 2.3 mAHD and provided some resistance to erosion. GHD advised replacement of that wall "with a more suitable structure", and ES&D notes that this has since occurred (site visit, 7/2/17).

Drawings provided by Craftsman Homes show that the floor level of living areas of the development are at 3.7 mAHD, with the total freeboard of 1.15m (known datum 2.55 mAHD).

Lacey 2016 modelling shows that the site is not at risk from inundation from sea level rise (modelling extends to 2100) but is at risk from a 1% AEP storm tide event by the year 2100, considered beyond the life of the building.

The recent modelling also shows that the property is vulnerable to coastal inundation by 2050 (based on a 1% AEP storm event in 2050, rounded up to the nearest 100mm plus 300mm added for freeboard). This finding broadly agrees with GHD, which indicated a potential risk of inundation in the event of a 1% AEP fluvial flood coinciding with a 1% AEP storm surge for the life of the development - upon which the majority of West Ulverstone would be flooded. Based on the GHD report, recent DPAC modelling, and information provided by Craftsman Homes, the development is at a low risk of inundation from fluvial flooding and storm surge for the life of the development.

In respect to the site at 8 Tasma Parade, ES&D considers that the information reviewed is sufficient to determine that there is a suitably low risk of inundation for the life of the building, thus there are no design, structural methods, management regimes or other steps required to reduce the level of risk to life and property, other than what is proposed in the development.

Environmental Service & Design

G. Rasmussen

A handwritten signature in dark ink, appearing to read 'G. Rasmussen', with a long, sweeping horizontal line extending to the right.

Environmental Consultant