
From: Victoria Lightfoot <vlightfoot@pageseager.com.au>
Sent: Thursday, 11 April 2024 4:13 PM
To: TPC Enquiry
Cc: andrew.walker@tasbar.com.au; danielle@grayplanning.com.au;
evan@e3planning.com.au; Anthony Spence
Subject: Cambridge Airport (PDPSAMEND-2021-022808) [PS:ACS:232146]
Attachments: Supplementary Statement Frazer Read - 11 April 2024 .pdf; Form No. 2 - Hearing attendance for parties.PDF

Good afternoon

Draft amendment PDPSAMEND-2021-022808

We act for Airport industrial Pty Ltd and RA Brooks Property Investments Pty Ltd.

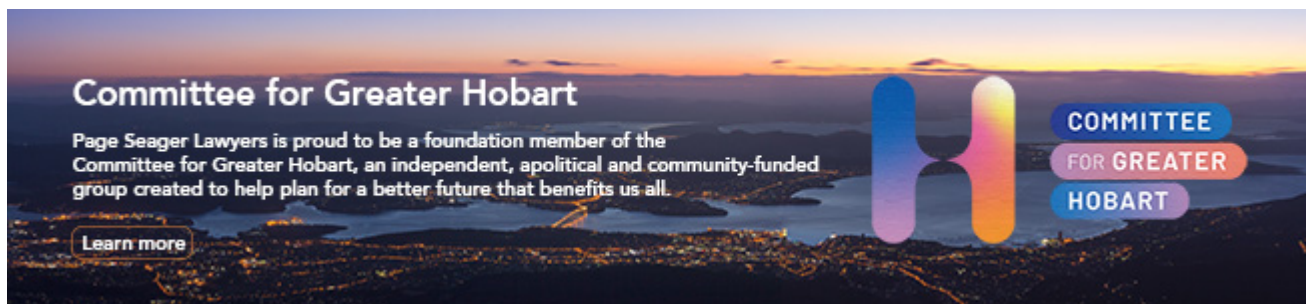
Please find **attached** response submission prepared by Mr Frazer Read. We apologise for filing this material a day later than directed.

We also attach form No. 2 in relation to our hearing attendance.

Kind regards

Victoria Lightfoot | Associate
Page Seager Lawyers
t (03) 6235 5176 m 0447 075 043 e vlightfoot@pageseager.com.au
Level 2, 179 Murray Street, Hobart
www.pageseager.com.au

[LinkedIn](#) | [eNews](#) [Subscribe](#)



This e-mail together with any attachments is intended for the named recipients only. It may contain privileged and confidential information. If you are not the intended recipient, we request you kindly notify us immediately by return e-mail or by telephone on +61 (0)3 6235 5155 and delete this e-mail, and any attachments, without copying, forwarding, disclosing or using it in any other way. The publication by others than the intended person(s) is prohibited. Any views expressed in this e-mail are those of the individual sender, except where the sender specifically states them to be the view of Page Seager Lawyers. Page Seager Lawyers does not represent, warrant or guarantee that the integrity of this communication has been maintained or that the communication is free of errors, virus or interference.

11 April 2024

John Ramsay
Delegate (Chair)
Tasmanian Planning Commission
Level 3, 144 Macquarie Street
HOBART 7001

Dear Mr Ramsay,

Tasmanian Planning Scheme - Clarence Draft amendment PDPSAMEND-2021-02280 - Apply airport obstacle limitation area overlay to land around Cambridge Airport

I prepared an original statement in relation to this matter, 16 November 2023 that set out:

- the existing planning scheme height controls for the Light Industrial Zone
- the 47m obstacle limitation overlay (OLS) for the Hobart Internal Airport that applies in the area
- the existing covenant restrictions on some lots in the Airport Industrial Subdivision
- the effect of the advertised OLS on land surrounding the Cambridge Airport

I have been requested by Anthony Spence of Page Seager on behalf of affected landowners Airport Industrial Pty Ltd, RA Brooks Property Investments Pty Ltd, Sarah Jane Rex, Benjamin Richmond Rex and Rustici Pty Ltd to prepare a supplementary statement in relation to the following:

- The impact of the revised OLS provided by Gray Planning, 8 March in relation to nos. 7,8 and 9 Cherokee Drive
- The compatibility of the proposed OLS with the height and form of typical light industrial development that may be expected to be constructed on these sites
- The general availability of other Light Industrial land in Greater Hobart

The Panel's Directions

The Panel directed 20 November 2023 that:

1. The owners and operator of Cambridge Airport (Cambridge Airport) are to prepare a draft revised obstacle limitation overlay (OLS) for the airport with the objective of achieving compatibility between -

(a) the current and future use and operations of the airport; and

(b) the current and future use and development of the lands in the immediate vicinity of the airport.

2. In undertaking the revision Cambridge Airport is to take into account -

(a) the written representations received in relation to Clarence LPS draft amendment PDPSAMEND-2021-022808;

(b) the written and oral submissions made by surrounding landowner parties at the Commission hearing of the draft amendment on 15 & 16 November 2023;

(c) the now known issues of concern or objection to the current draft overlay, and apply those issues of concern or objection as relevant to other surrounding properties, as if those owners had made a representation to the Commission hearing;

(d) any use or development limitations or restrictions on properties arising from subdivision or other real property transactions or the granting of planning permits;

(e) best practice application of the now obsolete requirements of CAAP 92A-1(0): "Guidelines on aerodromes intended only for small aeroplanes conducting RPT operations, published by CASA in October 2000, to the location of, and physical and operational circumstances of the airport; and

(f) any other matter it considers relevant.

3. In the graphic representation of any draft revised OLS, Cambridge Airport may seek the advice of the Commission's planning analyst Mr Simon Gatenby. Both Cambridge Airport and Mr Gatenby are to make brief contemporary file notes of the purpose and occasions of advice provided by Mr Gatenby. These notes will be published on the Commission website.

4. On completion of the draft revised OLS, Cambridge Airport is to present the draft to, and consult with the planning authority.

5. Stage 1 is to be completed and the revised draft OLS and an accompanying explanatory report is to be submitted to the Commission no later than close of business on Friday, 9 February 2024.

The impact of the revised OLS on affected land of interest

I attach as Appendix A three plans and associated sections prepared by registered surveyor, Andrew Birch of Rogerson & Birch Surveyors. These plans show the impact of the revised OLS on the following properties in particular:

- 8 Cherokee Drive, CT 182993/1 owned by RA Brooks Property Investments Pty Ltd
- 7 Cherokee Drive, CT 176911/15 owned by Benjamin Richmond Rex and Rustici Pty Ltd
- 9 Cherokee Drive, 176911/16 owned by Sarah Jane Rex and Rustici Pty Ltd

The blue dotted lines on the Rogerson Birch plans indicate a permitted building siting envelope informed by the following development standards for the Light Industrial Zone:

- a 5.5m front setback (Clause 18.4.2, A1)
- no side or rear boundary setback requirement (Clause 18.4.2, A2)

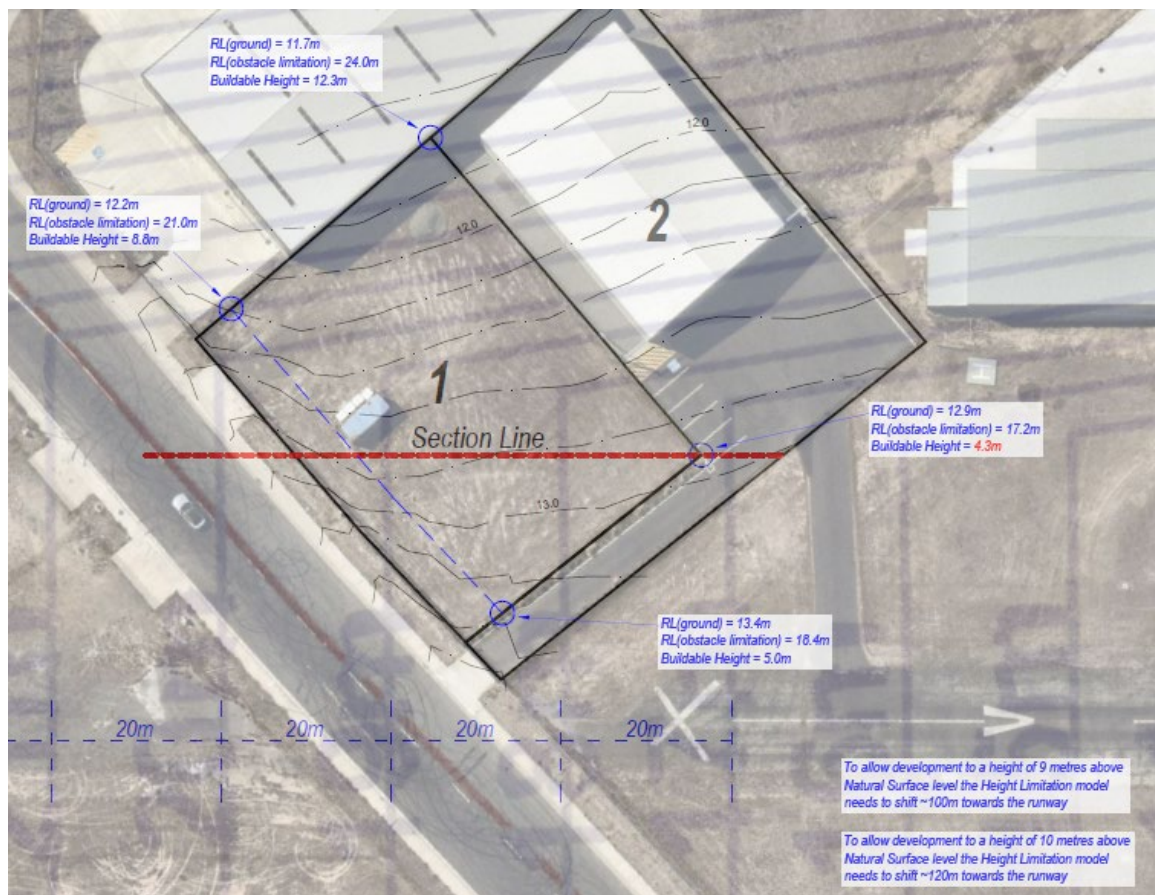
Plans 1 and 2 also show the buildable height in each corner of a building that complied with the permitted siting standards.

Existing building heights – Plan 3

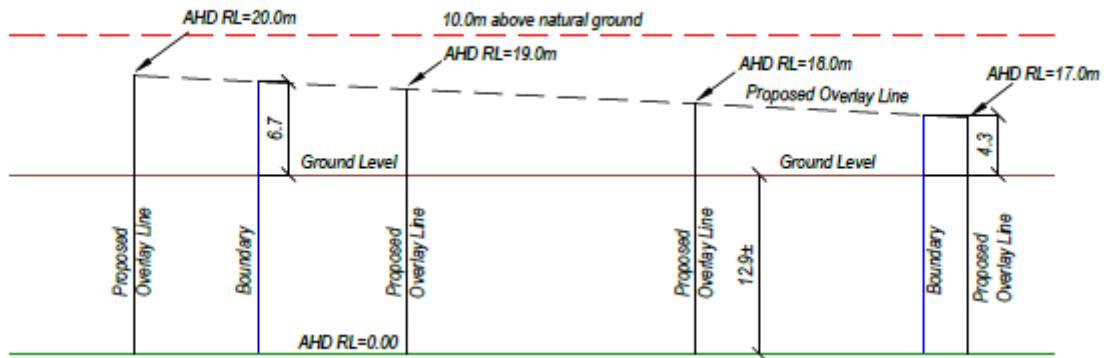
It is my understanding that Plan 3 demonstrates that the existing buildings on the developed lots at No.s 6, 48 and 61 Cherokee Drive would exceed the OLS overlay if it was approved, noting of course that the development of those lots has already occurred and the existing development will not be impacted by the proposed OLS per se. The fact that there is already some developed lots that exceed the OLS overlay heights seems to in some ways put to question the OLS’s utility. I note in particular that No.61 Cherokee Drive is 4.2m above the revised OLS.

Impact on 8 Cherokee Drive (Lot 1 on Plan 1)

Plan 1 in Appendix A includes the following plan and section diagram that show that the revised OLS will result in a residual or ‘buildable’ height at 8 Cherokee Drive of between 4.3m to 6.7m above existing ground level.



Plan 1 – Revised OLS mapping 8 Cherokee Drive (Source: Rogerson & Birch Surveyors)



Section 1 – Impact of revised OLS on 8 Cherokee Drive (Source: Rogerson Birch)

In my assessment the revised OLS would prevent development of the 8 Cherokee Drive for a typical light industrial warehouse style building.

I note that the adjacent building on 6 Cherokee Drive (lot 2 on Plan 1) has a roof height of RL 20.4m as shown on Plan 3. I estimate that this building has a height of approximately 8m above ground level.

Andrew Birch has advised (see blue notes in the bottom right corner of Plan 1 in Appendix A) that on his calculations the height limitation model would need to shift:

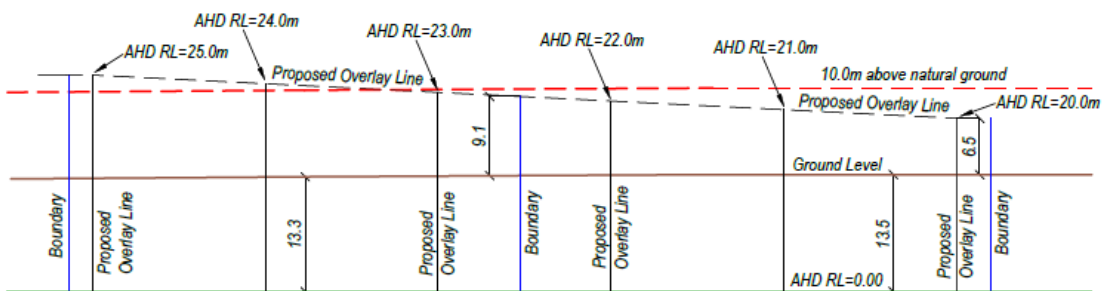
- 100m eastward to maintain a ‘buildable’ height of 9m above the ground level of 8 Cherokee Drive or
- 120m eastward if it were to maintain a ‘buildable’ height of 10m at 8 Cherokee Drive.

Impact on 7 and 9 Cherokee Drive (Lots 15 and 16)

Plan 2 in Appendix A includes the following plan and section diagram that shows that the revised OLS will result in a residual height as low as 4.2m in the south eastern corner of 7 Cherokee Drive and between 6.5m and 11.8 along the red section line at 7 & 9 Cherokee Drive.



Plan 2 – Revised OLS mapping 7 & 9 Cherokee Drive (Source: Rogerson & Birch Surveyors)



Section 2 – Impact of revised OLS on 7 & 9 Cherokee Drive (Source: Rogerson Birch)

Common characteristics of Light Industrial Development

Light industrial buildings are designed to accommodate a variety of activities, ranging from manufacturing and assembly to warehousing and distribution. While specific characteristics can vary based on location, purpose, and architectural design, I would expect that the typical features of future light industrial buildings on the sites at 8, 7 and 9 Cherokee Drive may include:

- **Simple Construction:** Light industrial buildings often feature simple and cost-effective construction methods, such as steel or concrete frames with metal siding or prefabricated panels. This simplicity allows for quick construction and modification as needed.
- **Open Floor Plans:** Light Industrial buildings usually have large, open floor plans with minimal internal columns or obstructions. A clear span working floor typically requires a higher roof to accommodate a trussed roof structure that is necessary to achieve unobstructed internal spans. This layout provides flexibility for various production processes, equipment placement, and storage configurations.
- **High Ceilings:** Light industrial buildings typically have high ceilings to accommodate tall equipment, machinery, and storage racks. This feature maximises vertical space utilisation and allows for efficient stacking of inventory or materials.
- **Loading Docks and Doors:** Light industrial buildings typically include loading docks and overhead doors to provide for easy access to shipping and receiving areas. They facilitate the movement of goods and materials in and out of the facility, often with spaces for trucks to maneuver and park.
- **Flexibility for Expansion or Adaptation:** Light industrial buildings are often designed with future growth or changes in mind. They may include features such as modular construction, clear span structures, or removable partitions to accommodate expansions or alterations to the layout as business needs evolve.

These characteristics are evident in the existing light industrial building stock in the Cambridge area. I consider that the 10m permitted height and siting standards of the Light Industrial Zone of the planning scheme provide good flexibility to accommodate future development with these characteristics.

The compatibility of the proposed OLS with the height and form of typical light industrial development

Having regard to the above it is my assessment that the proposal OLS would severely constrain the future development potential of 7 and 8 Cherokee Drive for light industrial development.

There would be some impact on the property at 9 Cherokee Drive. However, in my opinion the impact of the OLS with a minimum buildable height of 8.1m within the area of the permitted building envelope would not significantly constrain that property.

Supply of Light Industrial Land in Greater Hobart

The Panel will be aware that the supply of vacant industrial land in Greater Hobart is primarily limited to areas of Cambridge and Brighton.

In the Cambridge area, the subject Airport Industrial subdivision land and the Cranston Parade area to the west of the Hobart international Airport are largely the only remaining areas of private light industrial land available for development.

Light Industrial land at Cambridge is shown in Figure 1 below and includes:

- areas around the Cambridge township that are now fully developed,
- a recently constructed subdivision at the Cambridge Industrial Estate including Spark Drive and Abernant Way that is now largely developed or approved for development
- Kennedy Drive, which is fully developed
- The Airport Industrial subdivision (the subject land)
- Land within the Cranston Parade Specific Area (adjacent to the west of the Hobart International Airport) that is substantially vacant
- Undeveloped areas of the Hobart International Airport.



Figure 1 – Light Industrial Zoned Land Cambridge (Source: theList)

Clarence has three other pockets of light industrial zoning. Mornington is fully developed. Rokeby and Risdon Vale industrial estates are constrained by flood and other constraints and are not as conveniently located for efficient access to the road network.


Brighton has considerable areas of industrial zoned land including the Hub, Crooked Billet Drive and surrounding the Boral Quarry. Much of this land has been developed, is subject to lease or part of the larger Boral land holding. There are some but limited opportunities for new industrial development within these areas.

Beyond Clarence and Brighton there is limited vacant and available industrial land.

Summary

In my assessment the revised OLS continues to pose a severe impact on the ability to develop 8 Cherokee Drive and 7 Cherokee Drive for light industrial type buildings.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Frazer Read', is written in a cursive style.

Frazer Read
Principal
All Urban Planning Pty Ltd

Appendix A

Plans 1,2 and 3 prepared by Rogerson & Birch, 8 April 2024

OWNER AIRPORT INDUSTRIAL PTY LTD

FOLIO REFERENCE various

GRANTEE PART OF 1654 ACRES GTD TO ROBERT PITCAIRN AND THOMAS YOUNG

PLAN OF SURVEY

ROGERSON AND BIRCH SURVEYORS
 UNIT 1 – 2 KENNEDY DRIVE, CAMBRIDGE PARK
 PH 6248-5898 MOB. 0400-114-824

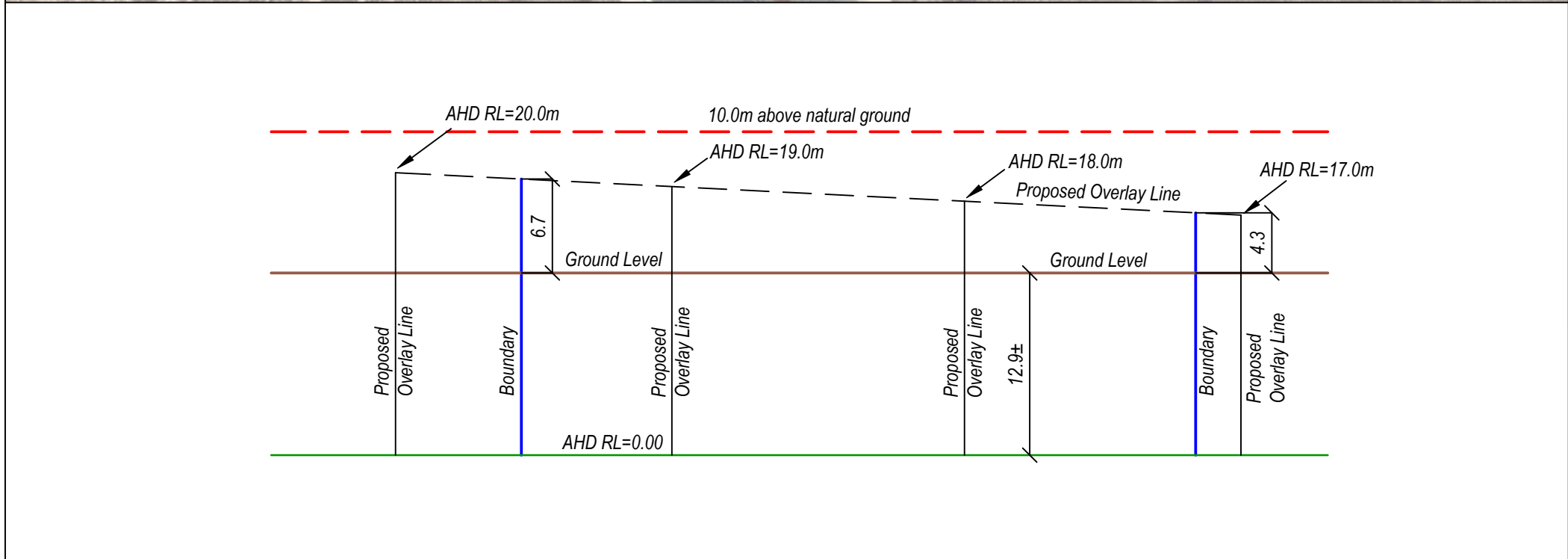
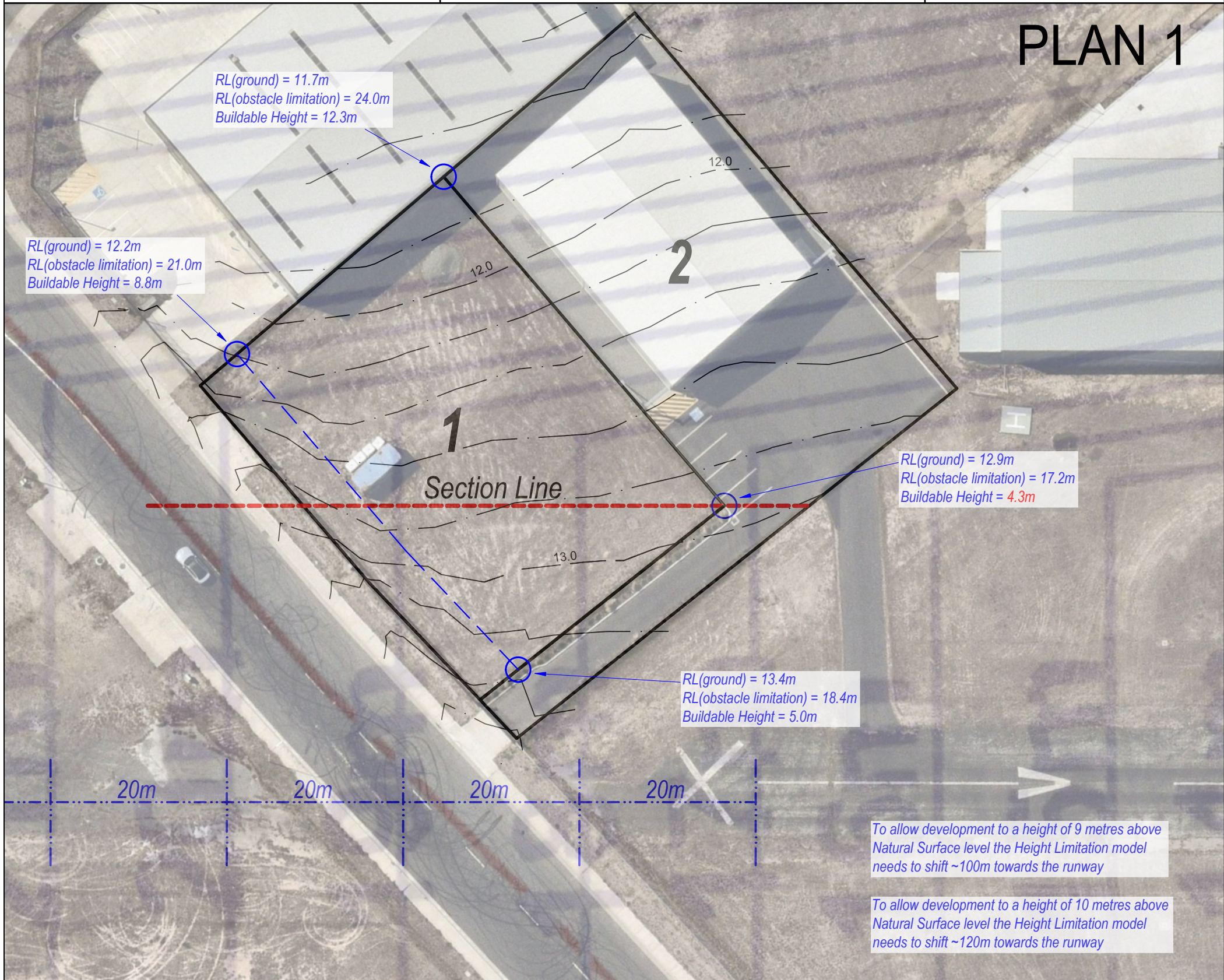
CITY OF CLARENCE

SCALE – NOT TO SCALE LENGTHS IN METRES

Registered Number

APPROVED EFFECTIVE FROM

Recorder of Titles



.....
 Registered Land Surveyor Date

.....
 Council Delegate Date

OWNER AIRPORT INDUSTRIAL PTY LTD

FOLIO REFERENCE various

GRANTEE PART OF 1654 ACRES GTD TO ROBERT PITCAIRN AND THOMAS YOUNG

PLAN OF SURVEY

ROGERSON AND BIRCH SURVEYORS
 UNIT 1 – 2 KENNEDY DRIVE, CAMBRIDGE PARK
 PH 6248-5898 MOB. 0400-114-824

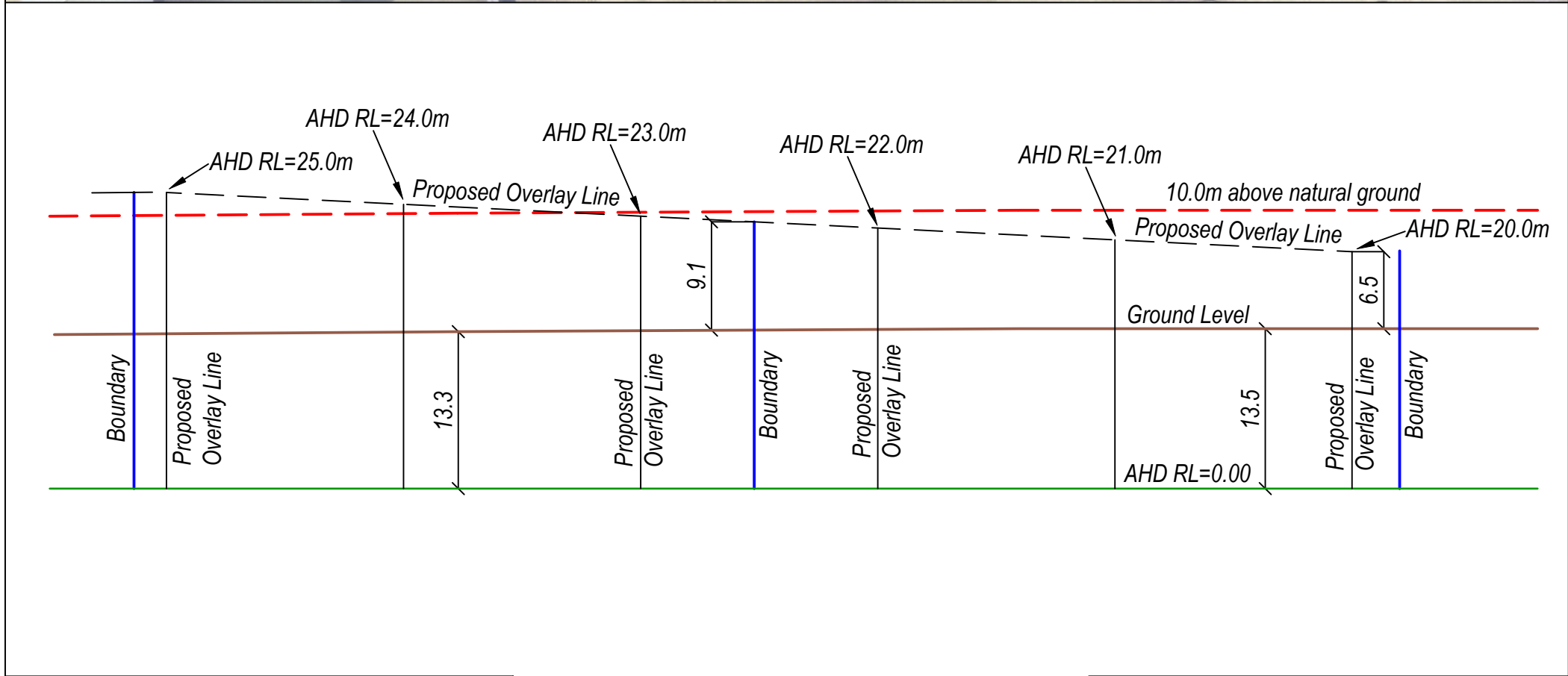
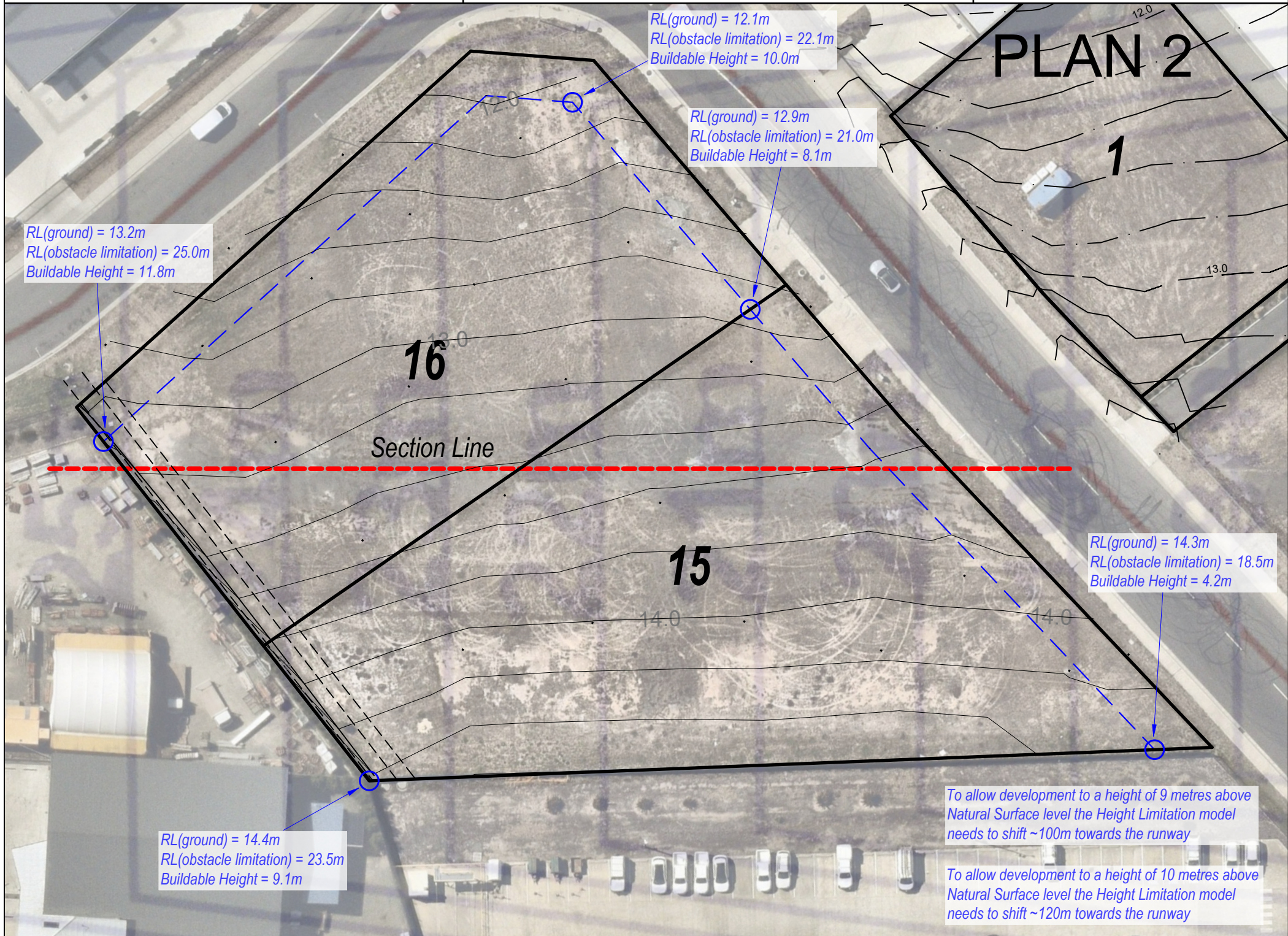
CITY OF CLARENCE

SCALE – NOT TO SCALE LENGTHS IN METRES

Registered Number

APPROVED EFFECTIVE FROM

Recorder of Titles



.....
 Registered Land Surveyor Date

.....
 Council Delegate Date

PLAN 3



| | | | | |
|-----|------------|-------|------|-------|
| E | | | | |
| D | | | | |
| C | | | | |
| B | | | | |
| A | | | | |
| REV | AMENDMENTS | DRAWN | DATE | APPR. |



UNIT 1, 2 KENNEDY DRIVE
 CAMBRIDGE 7170
 PHONE: (03)6248 5898
 EMAIL: admin@rbsurveyors.com
 WEB: www.rbsurveyors.com

Obstacle Height Limitation - existing buildings

FOR: Airport Industrial Pty Ltd
LOCATION: Cherokee Drive
 CAMBRIDGE

Reference: AIRIN03
 Date: 8-4-2024
 Scale: 1:1000 (A3)