
From: Geoff W <[REDACTED]>
Sent: Monday, 4 May 2026 6:05 PM
To: Kingborough LPS
Cc: TPC Enquiry
Subject: Submission - Kingborough Draft LPS - Direction 69 - Flowerpot
Attachments: Submission Flowerpot Locality.pdf

To the Tasmanian Planning Commission,

Please find attached my formal submission regarding **Direction 69** and the recommendations in the **Ireneinc report** for the Kingborough Draft Local Provisions Schedule.

My submission relates to the '**Flowerpot**' locality as a whole rather than an individual parcel.

I look forward to the Commission's consideration of these matters.

Kind regards,

Geoffrey Paul Wharton

4th May 2026

Nick Heath - *Delegate (Chair)*
Tasmanian Planning Commission

By Email: KingboroughLPS@planning.tas.gov.au

Dear Nick,

I write in response to your letter dated 2 April 2026 (ref: DOC/26/36829). I would like to take the opportunity to submit as follows:

Significant quantitative error in the assessment of the Flowerpot locality.

The Ireneinc report contains a significant quantitative error regarding parcel size distribution in the Flowerpot locality. On page 354 of the report in the evaluation of 'Decision point 4' it states that 'the majority of parcels within the locality are 15ha+'. This is incorrect. In fact the majority of parcels are less than 10.25ha with more than 70% (19 out of 27) being less than 15ha. See attached Figure 1 and Table 1 for a distribution of lot sizes in the Flowerpot locality.

Furthermore, there is a contiguous group of more than 10 parcels under 15ha, a subdivision pattern which responds to the topography and visual evidence of existing rural activities occurring, thus confirming that the locality has characteristics of a rural living settlement. The report acknowledges this and mentions the 'Flowerpot settlement' in the Localised landscape values baselining, but fails to evaluate these facts correctly at the relevant evaluation.

These errors are significant because it means the parcels within the locality were subsequently not assessed against the relevant criteria. Including section 34 of the *Land Use Planning and Approvals Act 1993* (LUPAA), the *Section 8A Guideline No. 1 — Local Provisions Schedule: Zone and Code Application* (the Zone Guidelines), or the *Southern Tasmania Regional Land Use Strategy* (STRLUS). The report stating 'N/A' for the relevant evaluations.

In the case of the Flowerpot locality the Ireneinc report has failed to meet it's obligations in response to Direction 69 issued by the Tasmanian Planning Commission (TPC). Therefore, the recommendations made by the report in regards to the Flowerpot locality are invalid.

I request that the Commission assess the parcels within the Flowerpot locality on a factual basis against the relevant criteria to determine an appropriate zoning. I also request an opportunity to respond to the proposed zoning before any final determination is made.

Yours sincerely,

A black rectangular box redacting the signature of Geoffrey Wharton.

Geoffrey Wharton

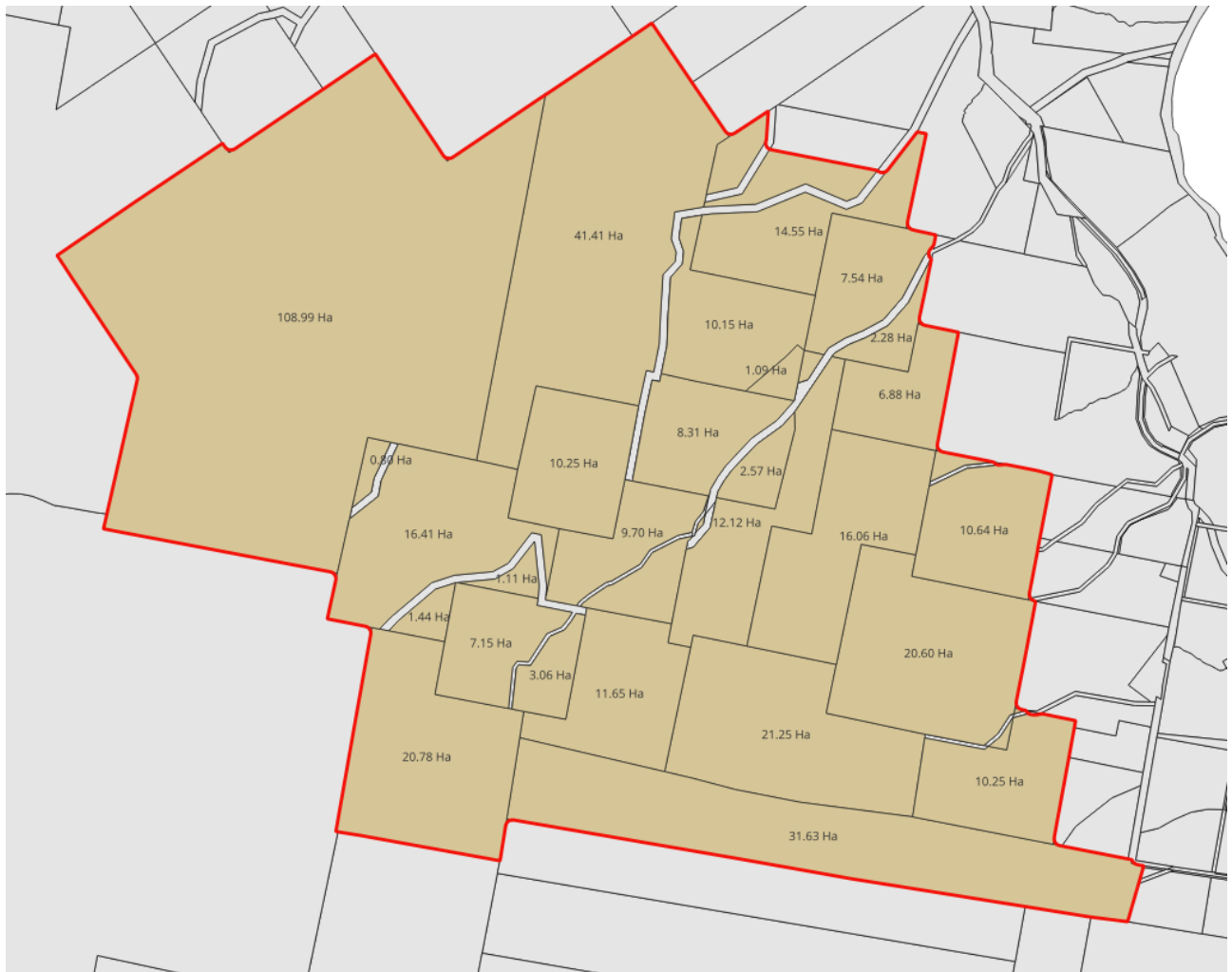


Figure 1: Lot sizes in hectares of parcels in the Flowerpot locality

Table 1: Parcel Areas in Hectares

FLOWERPOT LOCALITY PARCELS

<i>VOLUME</i>	<i>FOLIO</i>	<i>PID</i>	<i>Area ha</i>
129056	1	1848978	0.80
61436	1	5784668	1.09
129056	3	1848994	1.11
129056	2	1848986	1.44
105936	1	1511689	2.28
115097	2	2210087	2.57
129056	5	1849014	3.06
172987	2	3503121	6.88
129056	6	1849022	7.15
105937	1	7904344	7.55
115097	1	2210079	8.31
230587	1	5784684	9.70
108116	1	7904352	10.15
204735	1	5784692	10.25
222928	1	9630787	10.25
177425	1	9215374	10.64
232613	1	5784705	11.65
139386	1	2210095	12.12
221451	1	5777898	14.55
128858	1	5790814	16.06
129056	4	1849006	16.41
188465	2	9215375	20.60
129356	1	1849030	20.78
222929	1	5785740	21.25
161885	1	3137336	31.63
208732	1	5777871	41.41
213368	1	5784721	108.99