
From: David Buchanan [REDACTED]
Sent: Saturday, 2 May 2026 11:50 AM
To: Kingborough LPS
Subject: Submission to Contest LCZ on my property [REDACTED] Flowerpot Tas 7163
David Buchanan
Attachments: TPC Submission final.docx

To whom it may concern

Please find attached the above submission contesting LCZ on my property.

I look forward to the opportunity of a hearing with your commission regarding this matter.

Could you kindly confirm receipt of this email in order to meet the deadline of midnight Monday 4th May.

Yours sincerely

Dr David Buchanan
[REDACTED]

TASMANIAN PLANNING COMMISSION

Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report

PART A — PROCEDURAL OPENING

To the Tasmanian Planning Commission,

I write in response to the letter dated 2 April 2026 (ref: DOC/26/36829) advising that the Ireneinc report recommends my property remains within the Landscape Conservation Zone (LCZ) under the draft Kingborough Local Provisions Schedule (LPS).

I did not make a formal representation during the public exhibition period; however I understand that the Commission has received correspondence from me or on my behalf in relation to the draft LPS. I understand that this letter provides me with the opportunity to formally participate in this stage of the LPS process by making a written submission. I understand that making a submission does not confer a right to be heard, but that the Commission may decide to invite me to discuss the matters raised.

Note Bene: Please do not consider this submission to be generic in nature as it contains new and specific evidence regarding both my property and errors that Ireneinc have prima facie made in determining that Gallaghers Road Flowerpot was not a settlement when there is evidence that by definition Gallaghers Road has at least 10 properties with established dwellings that are contiguous and have lot sizes between 1 – 15 ha.

I take up that opportunity and submit as follows.

PART B — PROPERTY DETAILS

Landowner name(s)	David Andrew Buchanan
Property address	Flowerpot Tasmania 7163
Title reference (folio)	
Lot size (approx.)	8.315 ha
Locality	Flowerpot
Current IPS zone	Environmental Living Zone (ELZ)
Draft LPS exhibited zone	Landscape Conservation Zone (LCZ)
Ireneinc recommended zone	Landscape Conservation Zone (LCZ) — unchanged
Zone sought in this submission	Rural Living Zone (RLZ) — subcategory C or Rural Zone (RZ) whichever is the least restrictive.

PART C — STATEMENT OF POSITION

I submit that the application of the Landscape Conservation Zone (LCZ) to my property is not consistent with the requirements of 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).

I request that the Commission determine that the Rural Living Zone (RLZ Subcategory C) or Rural Zone (RZ) is the appropriate zone for my property under the draft Kingborough LPS.

The specific subcategory I seek is:

- Rural Living Zone C (minimum lot size 5 ha) — reflecting the existing lot pattern in my locality
- Or Rural Zone (whichever is the least restrictive but applicable away from LCZ)
- The predominant lot size in [REDACTED] from [REDACTED] is approximately 1 – 15 ha, consistent with RLZ A, B or C. My property is [REDACTED] Flowerpot.
-

PART D — GROUNDS FOR THIS SUBMISSION

D1 — The LCZ does not comply with the Zone Guidelines (Guideline No. 1 / s.34 LUPAA)

The Commission is required by section 35L(2) of LUPAA to assess whether the LPS meets the LPS criteria, which includes compliance with the Zone Guidelines. The Commission confirmed at the Day 20 hearing that it will decide on the basis of the LPS criteria set out in section 34 of LUPAA and explicitly noted that Council's position — including its 16 March 2026 resolution favouring the 'least restrictive alternative' — is not binding on the Commission [Transcript, Day 20, 06:45:48]. I submit that the application of LCZ to my property does not comply with the Zone Guidelines as demonstrated below:

D1.1 — The Zone Guidelines prohibit LCZ where priority is residential (LCZ 4(a))

Zone Guideline LCZ 4(a) provides that the LCZ should NOT be applied to land where the priority is for residential use and development, instead indicating that the RLZ should be referred to. The Zone Guidelines further note explicitly that 'the LCZ is not a large lot residential zone, in areas characterised by native vegetation cover and other landscape values.'

My property has been used for residential purposes throughout the period it has been zoned Environmental Living Zone (ELZ) under the Kingborough Interim Planning Scheme 2015. During my tenure, the primary use and strategic intention of the land is and has always been residential.

My property was first surveyed in 1895 and construction techniques describe an initial dwelling of four rooms consistent with that era: e.g. 6inch antique Baltic pine liner boards and ornate barge boards also of that era as well as brick fireplaces with original ornate mantelpieces. The dwelling has been consistently occupied since 1896. Since its original occupation it has been extensively renovated at substantial cost with council approval and is now a 3 bedroom 2 bathroom fully functional modern and upgraded residence with recent rewiring upgrades and full plumbing upgrades. The property is serviced by Tas Networks for electricity and has full elecom services for communications. There is no evidence to suggest that the primary use is other than residential for myself my wife and her children.

Photos of primary residence and outbuildings including Class 10A shed but chicken coops and enclosed vegetable gardens :

Photo 1 below – 3 bedroom two bathroom residence recently renovated and approved western view





Photo 2 above – eastern and nor-eastern view of residence.

Photo 3 – eastern view of Class 10 a outbuilding taken from western edge of the main residence.



Photo 4 – below entrance gate to the property with 'Bournbank' signalling how old the original residence is established 1896.



Photo 5 – above – western view of outbuilding and cleared area to the east of main and other buildings.

D1.2 — The LCZ is not a replacement zone for the ELZ (Zone Guidelines note)

The Zone Guidelines state expressly: 'The LCZ is not a replacement zone for the ELZ in interim planning schemes. There are key policy differences between the two zones.' The TPC itself noted this in its post-lodgement correspondence with Council, observing that the LCZ 'appears to have been used quite extensively to replace the ELZ' and that 'application of the LCZ could signify a shift in council policy or strategy, which generally ought to be comprehensively justified.'

No such comprehensive, site-specific justification has been provided for my property. The Ireneinc report applies the LCZ to my property on the basis of generalised locality-level landscape values that are themselves not clearly articulated and without consultation, rather than on the basis of clearly articulated and demonstrated landscape values specific to my title.

The Ireneinc Locality Report for Flowerpot does not identify any specific landscape values on my title. The landscape value assessment is made at locality level without reference to the characteristics of my individual property. Indeed my primary residence is deep in a gully and cannot be seen from the Channel highway.

D1.3 — The RLZ is the appropriate zone under the Zone Guidelines (RLZ 1 and RLZ 2(b))

Zone Guideline RLZ 1(a) provides that the RLZ should be applied to residential areas with larger lots where the existing and intended use is a mix between residential and lower order rural activities, with priority given to the protection of residential amenity. This description accurately characterises my property.

Zone Guideline RLZ 2(b) further provides that the RLZ may be applied to land within the ELZ in an interim planning scheme where the primary strategic intention is for residential use and development within a rural setting and a similar minimum allowable lot size is being applied. My property satisfies both elements of this criterion.

My property has an area of 8.315 ha. This is consistent with the RLZ C minimum lot size of 5 ha and does not provide for further subdivision under that subcategory.

Photo 6 – below -Lower order rural activities chickens an two beehives:



D2 — The Ireneinc evaluation framework, applied correctly to my property, supports RLZ or RZ

The Ireneinc report applies an evaluation pathway (decision tree) to determine the appropriate zone. The Commission was told at Day 20 of the hearing that this framework is not a statutory instrument — it is a tool, not a rule [Kate Heckelmann, Transcript Day 20, 05:53:00]. Representations can depart from it with good evidence. However, I submit that even applying the framework as intended, my property satisfies the criteria for RLZ rather than LCZ.

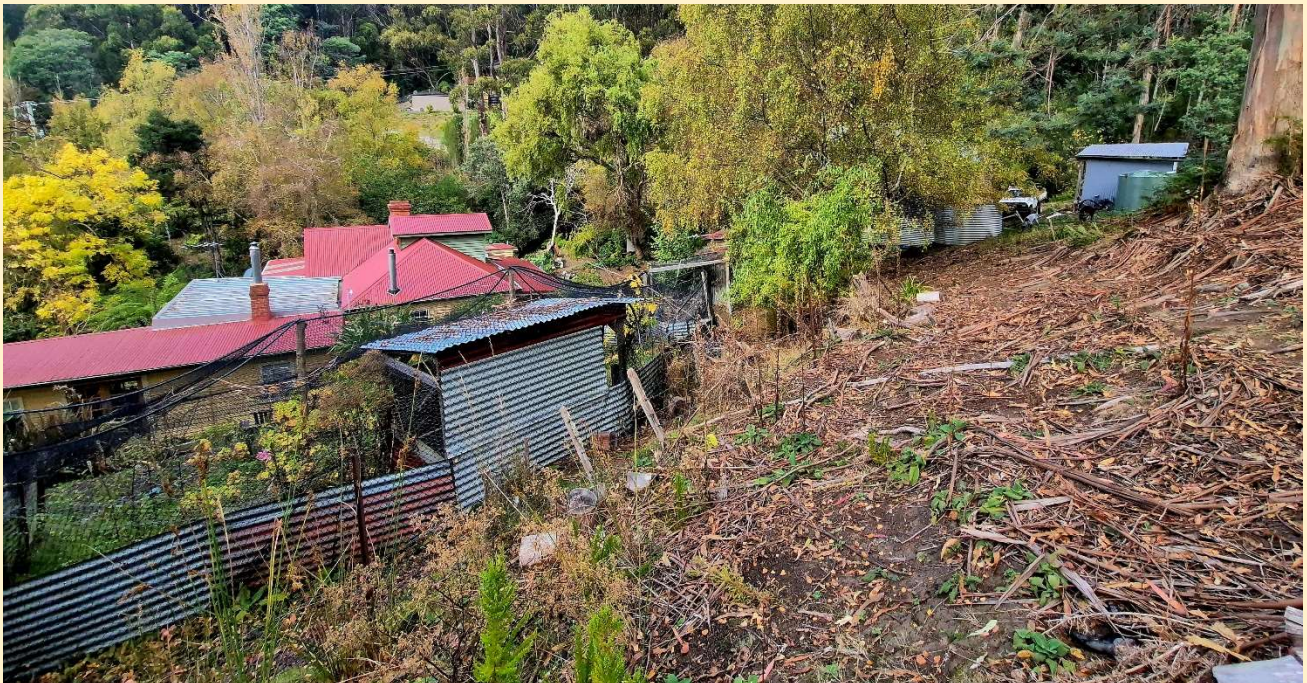
D2.1 — My property has a strategic residential intention

The first decision point in the Ireneinc evaluation pathway asks whether there is a strategic intention for residential use. The report identifies visual evidence of existing residential use and known strategic intention as the relevant indicators. My property clearly satisfies this criterion see photos 1 -

My property contains an established dwelling dating back to 1896 and, has associated outbuildings including a very large bespoke and council approved Class 10 building, and garden areas of approximately 0.5ha that surround this dwelling with a well-established array of European trees similar to an arboretum that date back to the 1890s. There is also a cleared area to the north and west around the dwelling of approximately 1 ha. This amounts to approximately 1.5 ha that has been a long established cultivated rural scape. On this 1.5ha there are established fruit trees and vegetable gardens free range chickens and fencing dating back to 1967. It is thought that these fences were replaced after to the 1967 fires. The original dwelling was unharmed in the 1967 fires. Aerial photography over a period of many years confirms the consistently residential character of the property.

See Photos 1 – 5 above

See following photos here of evidence that supports paragraph 2 D2.1 above:





D2.2 — My property has the characteristics of a rural living settlement

The Ireneinc framework identifies rural living settlement characteristics has: at least 10 smaller blocks generally ranging in size between 1–15 ha with a consistent lot pattern; a consistent pattern of detached dwellings with associated outbuildings; and visual evidence of rural activities (cleared areas, hobby farming, grazing and chickens). The Ireneinc report's own locality baseline confirms that the broader settlement in which my property sits displays these characteristics.

Note Bene: My property is situated within a cluster of more than ten contiguous properties along Gallaghers Road, each with lot sizes ranging from approximately 1 ha to 8.3ha – that is within a 1- 15 ha lot pattern. The settlement pattern is consistent and has been established since 1920s. Neighbouring properties contain detached dwellings with associated rural activities including hobby farming, grazing and small orchards. Moreover the Ireneinc report made several important errors in this regard in relation to Gallaghers s Road Flowerpot. It clearly denied what is the case that more than 10 contiguous properties with residential dwellings exist labelling it N/A on its decision tree and on this basis denied a settlement even exists when it clearly does and has for many decades. This seems to constitute either an erratum in terms of an oversight or an error of judgement. Either way it is a major mistake in terms of the decision tree for the allocation of LCZ within their own decision tree framework.

Image 1. *Parcel sizes Flowerpot locality.png*

- Shows all the sizes for each parcel that was included in the IreneInc report for the Flowerpot locality. If I have done my sums correctly, there are 27 parcels total. 19 of them are less than 15 Ha.



Image 2 **Aerial photo** showing the contiguity and number of lot sizes between 1 - 15 ha with cleared or used vegetation coverage.



D2.3 — The identified landscape values can be managed outside of LCZ

The Ireneinc evaluation framework requires consideration of whether identified landscape values can be appropriately managed outside of LCZ, specifically through the Natural Assets Code (NAC), the Scenic Protection Code (SPC), or a Specific Area Plan (SAP). The Commission itself accepted this argument in relation to Kettering West at Day 20, where the panel effectively found that the Priority Vegetation Area (PVA) overlay does the landscape-protection work, not the zone [Transcript, Day 20, 02:33:54]. Moreover, there is an essential problematic here in that neither Ireneinc nor Kingborough Council have articulated consistency in what landscape values even are – which points to an inconsistency to LCZ's application on the basis of landscape values. There has not been clear articulation of landscape values, so it seems arbitrary that some properties have landscape values and others recommended for Rural Zone do not. That is to say there is an inherent inconsistency in LCZ attribution - especially considering that many proposed Rural Zones have dense vegetation. Either way overlays and codes protect biodiversity and vegetation not Landscape values. In Ireneinc's report landscape values remain unclear and arbitrary in their subjective attribution. This subjectivity is something that was conceded by Ireneinc's delegate on Day 1 of the hearings.

My property is within a Scenic Protection Area (SPA). It is also subject to the NAC / PVA overlay. These overlay controls provide adequate management of any landscape values present, without the need for the more restrictive LCZ.

My property has a long history of being used as berry farm and as a flower farm and there is a long established arboretum of European or exotic species of approximately 0.5 ha. There is clearing of 1 ha to the north and west of my dwelling that remains in situ. Beyond this is predominantly acacia dealbata that is of moderate density for approximately 4.5 ha. For the remaining 2 ha there is approximately 60% regrowth of predominantly Eucalyptus Obliqua and with some Globulus. There is a mix of long established European and native vegetation on the title with substantial cleared areas.

D2.4 — The RLZ subcategory provides for limited or no further subdivision

The Ireneinc framework identifies as a key RLZ suitability indicator that the transition 'would result in limited/no further subdivision' and that 'a similar minimum allowable lot size is being applied.' Applying RLZ C to my property achieves this outcome, as the minimum lot size under that subcategory is consistent with the existing lot size and does not create a viable subdivision pathway.

My property has an area of 8.315 ha. Under RLZ C, the minimum lot size 5ha (with an 8 ha performance criteria). Subdivision of my property under this subcategory would not be possible thus addressing any concern about intensification.

D3 — The TPC panel's own statements support RLZ for properties like mine

The following exchanges from the Day 19 and Day 20 TPC hearings directly support the argument that the RLZ or RZ is more appropriate than the LCZ for my property. These statements were made by TPC Commissioners and are on the public record.

D3.1 — The evaluation framework is not a statutory instrument

Kate Heckelmann (Ireneinc) conceded at Day 20 [05:53:00] that the evaluation framework is not a statutory instrument — it is a tool, not a rule. The Commission is not bound by its application in any individual case and must assess my property against the statutory criteria in section 34 of LUPAA and the Zone Guidelines.

D3.2 — Risk ratings are judgement calls, not defined thresholds

At Day 20, the low/medium/high risk ratings applied by Ireneinc to LCZ recommendations were described as judgement calls, not defined thresholds. Ireneinc's position was that these ratings are a rule of thumb only [Day 20 guide]. The Commission has not yet determined what weight to give these ratings. Where the risk rating applied to my locality is medium or high, this is not a determinative finding — it is an assessment that can be challenged with site-specific evidence.

The Ireneinc report rates the transition of land in Flowerpot to RLZ as medium to high risk. This rating is again problematic as Ireneinc could not define what this risk was or is as it relates both generally to the area but importantly to my property. It is implied that the risk is to vegetation and landscape values however, these landscape values are not clearly articulated or demonstrable as they relate to my specific property. Therefore, I submit that this rating does not accurately reflect the characteristics of my individual property.

Image 3 *Tasveg 5 codes Flowerpot.png*

This shows TASVEG 5.0 'VEG Groups', screen grabbed from the Listmap. This is useful to show that the 'Modified Land' extends up to [REDACTED]: "<https://www.thelist.tas.gov.au/app/content/data/geo-meta-data-record?>[REDACTED]". This image is over the above aerial image.

underneath.

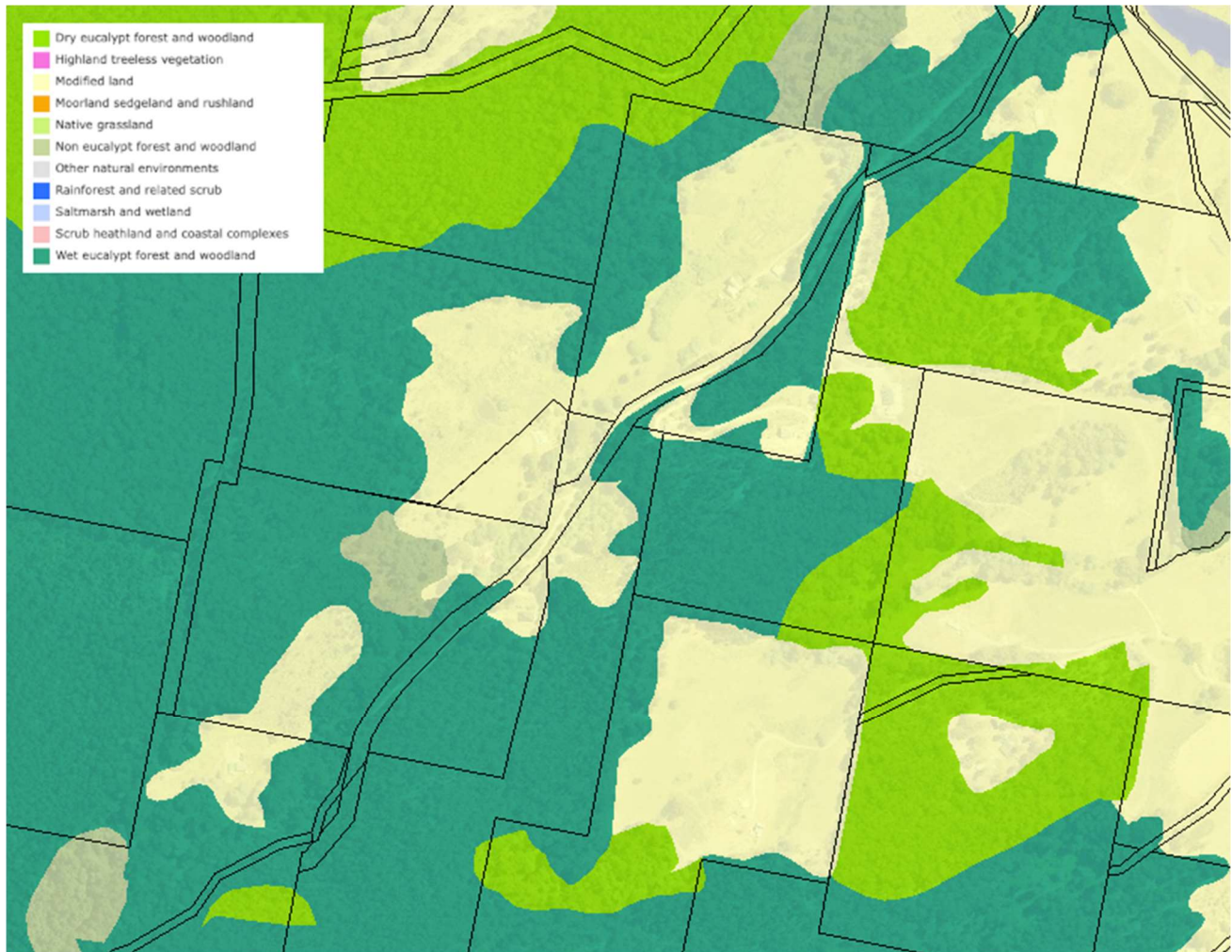


Image 4 – historical aerial image of land use with historical mostly cleared areas on lot:



D3.3 — Visible rural activity is not required for RLZ

The TPC panel confirmed at Day 20 that visible rural activity is not a prerequisite for RLZ. This was applied consistently across multiple localities including Howden, Albion Heights, and Kingston West [Day 20 guide]. Properties need not demonstrate active farming or grazing to satisfy the RLZ criteria — residential use in a rural setting is sufficient. Again, I submit that given my residential dwelling on my dwelling has been here since the late 1890s and has been improved via renovations through iterative builds and extensions. The latest renovations were approved in 2021. This establishes primary residential use of my property.

D3.4 — Comparison to accepted RLZ localities

The Ireneinc report recommended full ELZ to RLZ transitions for a number of localities, including Kettering East and Oyster Cove, Howden and Blackmans Bay, Albion Heights, and Tinderbox West. No questions were asked about these recommendations at the hearing, though this does not indicate acceptance by the Commission. The characteristics of those localities — established residential settlement, lots generally between 1 and 15 ha, mixed residential and rural activities, limited evidence of significant landscape values requiring LCZ protection — are shared by my property.

My property in Flowerpot is directly comparable to properties in a similar locality where RLZ was recommended. Both areas share the following characteristics: lot sizes 1 – 15 ha, settlement pattern is demonstrable see map, absence of defined and clearly articulated landscape values. There is no principled basis on which to treat my property differently.

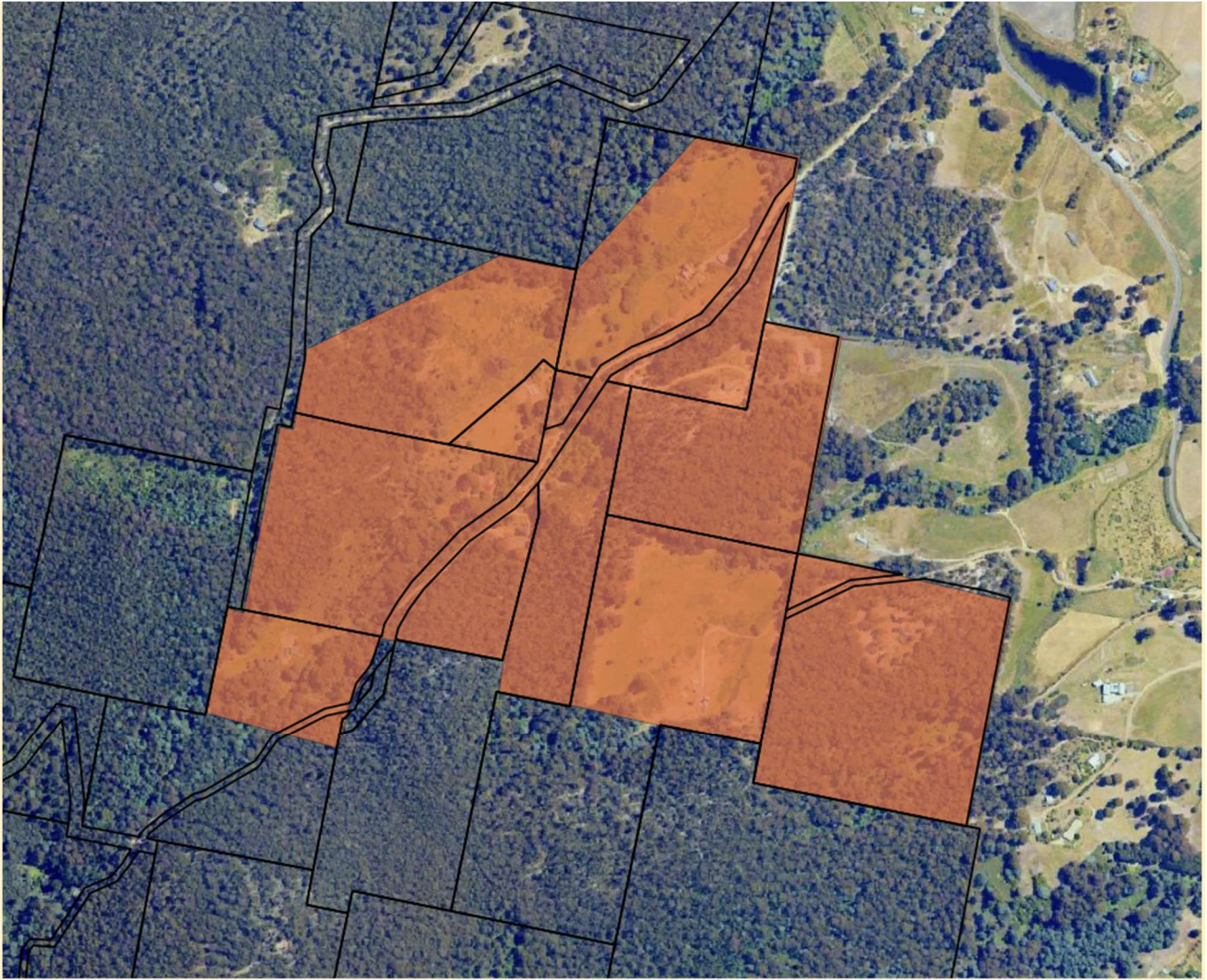
D4 — Consistency and fragmentation arguments

D4.1 — Fragmented LCZ application should be resolved in favour of the surrounding zone

The Ireneinc report itself identifies avoidance of fragmented LCZ application as a key principle. The report notes that areas where only 2–3 LCZ-zoned properties are surrounded by Rural Zone (RZ) or RLZ land should be modified to resolve the fragmentation. Where my property is located within or adjacent to an area predominantly zoned RLZ or RZ, the application of LCZ creates exactly the kind of spot-zoning that the Ireneinc framework seeks to avoid.

My property is surrounded to the east by seven contiguous properties with established dwellings zoned Rural Zone under the draft LPS and two properties with established dwellings to the south and west that are like mine proposed for LCZ under the draft LPS. The application of LCZ to my property and the ones next to me to the south and north creates a fragmented and isolated pocket of LCZ within a predominantly Rural Zone area where the on the ground reality is that our dwellings are literally a stone's throw away from each other: approximately 50 metres and our boundaries abut.

Image 4 – below – demonstrates how all properties shaded are very similar yet are recommended for different zonings in the Ireneinc report. These shaded properties ought to be all the same zoning not split zoned as they are currently recommended.



D4.2 — Inconsistency with adjoining or comparable properties

The Zone Guidelines require that the spatial application of zones be, as far as practicable, consistent with and coordinated across the LPS. Where neighbouring properties with substantially similar characteristics have been recommended for RZ, the application of LCZ to my property is inconsistent and not supported by evidence of any material difference other than vegetation that is covered by the overlays I am on as stipulated earlier. Moreover this ought not preclude RLZ given the nature of the mistake regarding the Gallaghers Road denial of a settlement in the Ireneinc report : thus rendering the recommendation of RLZ less likely.

The property at [REDACTED], which is immediately adjacent to mine and shares the a similar small lot size, settlement character, and land cover, has been recommended for [RZ]. There is no identified difference given the inconsistencies inherent with the current interpretations applied of landscape values, vegetation cover, or development history that would justify the different treatment of my property.

See Image 4 above.

D5 — Council's approach has been historically inconsistent

The Ireneinc LCZ Review report documents a significant evolution — and inconsistency — in Council's approach to the application of the LCZ to ELZ land. At the time the draft LPS was first submitted to the TPC in 2020, approximately 85% of ELZ parcels were proposed for LCZ. The TPC noted that this approach was often inconsistent with the Zone Guidelines and that 'often when assessing particular sites the zone proposed does not seem to match these criteria or those of Guideline No.1.' By the time of public exhibition the proportion had been reduced to approximately 75%, with the balance transitioning to RLZ, RZ, and other zones.

This history demonstrates that the initial presumption in favour of LCZ was not well-founded and that the LCZ application has been progressively narrowed as the evidence base has been tested. The Ireneinc report represents a further iteration of this process, but where the evidence specific to my property supports RLZ or RZ the LCZ recommendation should not be allowed to stand.

This supports evidence that the methodology of the councils' recommendations for LCZ entailed a confirmation bias towards LCZ that led to mistakes defining 'settlements' as being not applicable and residential values unrecognised as per Criteria 1 as part of their reports and recommendations for LCZ in the case of my property and [REDACTED] more generally. The denial of a settlement by both the council and Ireneinc speak to this inconsistency.

D6 — Any landscape values present can be managed without LCZ

Where landscape values are present on or near my property, I submit that they can be appropriately managed through the application of the relevant overlay controls, without the need for LCZ. The TPC panel acknowledged on Day 20 [02:33:54] that the PVA overlay and SPC do the landscape-protection work in many cases, removing the justification for LCZ in those areas.

Ireneinc itself acknowledged in the LCZ Review report that a future rural living settlement review may reconsider current RLZ decisions, and that any short-term risk is 'not something that's a definitive or a risk that can't be mitigated with future action' [Transcript, 03:06:18]. This acknowledgement of residual risk mitigation further supports the appropriateness of RLZ or RZ rather than LCZ for my property.

My property is within the SPA / PVA overlay and subject to the NAC. These controls see five codes over my property including Scenic Code; Waterways Code; Biodiversity Overlay; Slip Code; and Protected Vegetation Code. The combined effect of RLZ or RZ zoning and these overlay controls is sufficient to manage any landscape values identified in the locality baseline without resort to LCZ.

D7 — Inconsistency in the Ireneinc evaluation framework (Attachment A)

A formal inconsistency analysis has been prepared and is attached to this submission as Attachment A. That analysis compares the landscape value descriptions, settlement characteristics, lot sizes, SPA coverage, PVA/NAC overlay coverage, and risk ratings applied by Ireneinc to this locality against one or more similar localities that received a more favourable zone outcome using the same or near-identical evidence.

The analysis draws on the following key statements from the Day 20 TPC hearing:

- Commissioner Rohan Probert [01:07:48]: Directly identified that landscape descriptions for Tinderbox East and Howden are near-identical yet produced opposite zone outcomes, asking Ireneinc to identify the actual difference between those two. This principle applies to the inconsistency documented in Attachment A for this locality.
- Commissioner Dan Ford [02:33:54]: Forced the concession that the PVA overlay does the landscape-protection work, not the zone. This principle applies where PVA overlay is present on my property.
- Kate Heckelmann (Ireneinc) [05:53:00]: The evaluation framework is a tool, not a statutory instrument. Submissions can depart from it with good evidence.

As documented in Attachment A — Flowerpot section, the comparison with Kettering East and Oyster Cove shows that Ireneinc applied near-identical landscape value descriptions in both localities and erred in its settlement findings on the [REDACTED] Flowerpot locality yet recommended [LCZ] for Flowerpot including my property and RLZ for East Kettering and Oyster Cove.

I request that the Commission have regard to Attachment A in assessing this submission, and in particular to the specific comparison rows identified below (see **Specific landscape value statements by Ireneinc for your locality and how it relates to your property in comparison with Kettering East and Oyster Cove (that were recommended with RLZ rather than LCZ.)**), which demonstrate that the Ireneinc recommendation for this locality is Flowerpot [REDACTED] inconsistent with the outcome produced by the same evaluation framework applied to comparable localities elsewhere in the municipality.

PART E — LOCALITY-SPECIFIC CONTEXT

➡ **Locality name** Flowerpot.

➡ **Ireneinc recommendation for this locality**

The Ireneinc report recommends LCZ for the majority of Flowerpot, with RZ applied to 10 to 99 Gallaghers Road but LCZ to 100, 103 and 150 despite them being in the same settlement.

➡ **Contextual TPC panel comments specific to your locality (from Day 20 hearing guide)**

The TPC Panel Chair Nick Heath made observations though stopped short of extensive questioning. The panel noted this was the first of many localities and that more extensive questions would be raised at the individual hearing stage. His key comments were:

- That Flowerpot is a large locality which poses different challenges to smaller ones.
- He flagged that Ireneinc had recommended different zones for eastern and western parts of the locality and commented that the panel would need to work through why that differentiation is justified. He further observed that looking at the aerial photography most lots appear to already contain dwellings so the number of vacant lots with development potential may be limited. This limitation potentially reduced the risk argument for LCZ.
- He also raised the height provisions question and whether the concern for building height in the RLZ would apply to extensions and rebuilds of existing properties not just new builds. Ireneinc confirmed that extensions and changes to existing properties were the highest risk, with elevation playing a role in distinguishing the east west divide of the locality. At this point he pressed Ireneinc on the landscape detriment risk might be between the two zones and what the actual harm might be. He suggested this would be an ongoing question across many localities.
- Delegate Dan Ford pointed out the difficulty of assessing landscape values in the absence of them being clearly defined and conceptually clear. And the wider panel noted questions would remain when individual representations are made.
- The panel concluded on the Flowerpot locality that the TPC will need to scrutinise the east/west differentiation more carefully and the height risk was noted as something warranting further examination.
- The panel broadly accepted that these questions remain open to more scrutiny and with ground level evidence as to residential history; land use; settlement validity; and

➡ **Specific landscape value statements by Ireneinc for your locality and how it relates to your property in comparison with Kettering East and Oyster Cove (that were recommended with RLZ rather than LCZ.)**

The Ireneinc report identifies the landscape value in Flowerpot as: see below chart/diagram in direct comparison with Kettering East and Oyster Cove:

8. Flowerpot [Channel Region]

Ireneinc outcome: LCZ for bulk; identifiable cluster → Rural Zone (split-zone approach). Ireneinc recommendation at Day 20: Pattern consistent with Birchs Bay and Middleton.

Characteristic	Flowerpot (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Ridgeline bushland corridor connecting Birchs Bay to Gordon; 'elevating bushland features retained around existing development contributing to landscape value and scenic values including large areas of native vegetation hills'	Scenic landscape; coastal interface; bushland — same Channel region language Landscape values present but manageable
Settlement characteristics found	Cluster: identifiable rural pattern with existing rural activities. LCZ bulk: larger vegetated lots	Yes — consistent rural living settlement throughout
Lot sizes	Cluster: smaller/cleared. LCZ bulk: larger/vegetated	1–10 ha
SPA coverage	Partial	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ bulk	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — corridor continuity cited	YES — codes and min lot size; full RLZ
Key differentiator cited	Ridgeline bushland corridor must be maintained (Birchs Bay to Gordon)	Consistent settlement pattern; existing blocks already fully used; codes manage values

I submit that the Flowerpot column above does not reflect my property in the following ways:

- Regarding the characteristic 'landscape value description': Kettering and Oyster Cove also has the same ridgeline bushland that Flowerpot has and, that Flowerpot also has coastal interface with an

identified settlement along Fleurty's Lane. The connection they speak of from Birches Bay to Gordon does not commence at Birches Bay but is consistent along the ridgeline for the entirety of the Channel region and is known as the Herringbone Ridge. The same manageability identified for Kettering East and Oyster Cove would therefore by definition pertain equally to the Flowerpot locality as the ridgeline areas are contiguous. Similar native vegetation is apparent throughout all these localities and therefore similar scenic and landscape values would apply.

- Regarding Settlement characteristics: the cluster of which Ireneinc speak for [REDACTED] Flowerpot is as previously pointed out that at least 10 contiguous properties with well-established dwellings that are between 1 – 15 ha in lot size exist and that by definition renders Flowerpot to have settlement characteristics.
- While lot sizes are slightly larger higher in size in properties west of [REDACTED] the well-established Flowerpot settlement from [REDACTED] of which my property is apart thereof is from 1 -10 ha that is directly comparable to both Kettering East and Oyster Cove. My specific property is but 8.315 ha in size.
- The Risk rating of medium for Kettering East and Oyster Cove and Medium-High for Flowerpot attained here by Ireneinc is by their own admission subjective and not clearly articulated or conceptually clarified. Moreover, pertaining to my specific property where does the exact and specific property application of medium as opposed to high cut off? Nearly half my property is cleared or given long established exotic gardens. Moreover, given a similar ridgeline and elevation and therefore corridor to both Kettering East and Oyster Cove, I submit that my property is likely medium risk and therefore directly comparable to their RLZ standards as assessed by Ireneinc in their case.
- The DP6 codes to manage landscape values Ireneinc is again inconsistent here in their conclusions. My property has the same codes and minimum lot size as those given RLZ in both Kettering East and Oyster Cove.
- And lastly their key differentiator(s) used that Ireneinc argue for is: 1. that the ridgeline must be maintained; 2. Flowerpot's differences to Kettering East and Oyster Cove are that the latter have a consistent settlement pattern; 3. existing blocks already fully used; and, 4. can be managed by codes. I submit that there is a well-and-long-established settlement pattern in Gallaghers Road apart of which my property and its residential dwelling have been fully used since the late 1890s. This differentiation by Ireneinc between Kettering East and Oyster Cove and my property as part of the Flowerpot settlement is not cogent or valid here on all four differentiations.

➡ **Existing zoning context for your locality** The Flowerpot [REDACTED] area includes 10 properties (that constitute a settlement) are currently zoned Rural Resource or ELZ under the KIPS2015. Seven of those properties are now recommended for RZ up to and including [REDACTED]. My property both adjoins and is in close proximity to [REDACTED] that is recommended for RZ; as does 103 Gallaghers Road with 99 Gallaghers Road. Properties [REDACTED] are recommended for LCZ even though all 10 properties are contiguous and represent a settlement. This amounts to a split zoning within this settlement that demonstrates that the corridor rationale for zoning has an arbitrary delimitation particularly relevant when comparing the Kettering East and Oyster Cove inclusions in RLZ and Flowerpot's exclusion from same. This split zoning between 84 and 100/ 150 and 99/ 103 is not a tenable proposition as it represents more an arbitrary divide between eastern and western Gallaghers Road when they are part of a whole settlement.

PART F – LACK OF CONSULTATION BY KINGBOROUGH COUNCIL

STRLUS CV 4.1: No Community Consultation on Landscape Values

Council and Ireneinc rely on STRLUS CV 4.2 and CV 4.3 to justify applying LCZ to ELZ land in preference to RLZ — arguing that LCZ is necessary to ensure the key values of regionally significant landscapes are not compromised by development.

Before CV 4.2 and CV 4.3 can be engaged in this way, the foundational sub-policy CV 4.1 must be satisfied.

CV 4.1 requires State and local government, in consultation with the community, to determine an agreed set of criteria for determining the relative significance of important landscapes and key landscape values. The significance of the landscape values Council seeks to protect through LCZ must first be established through that agreed criteria process.

No independent community consultation on landscape significance criteria has been conducted in Kingborough.

CV 4.1 was designed to address a recognised gap: the STRLUS narrative identifies 'the limited understanding of cultural landscape values and the lack of an overarching policy with respect to determining relative significance' as an existing problem at the time of the strategy's publication. The landscape significance

determinations underpinning the LCZ recommendations were made by Council without community input on the criteria used.

The community's assessment of these landscapes, as expressed in exhibition representations, consistently identified residential use as the primary land use and the Scenic Protection, Priority Vegetation and Natural Assets codes as adequate for landscape value protection. That is the only available community evidence on the significance question, and it does not support the criteria Council applied.

Road Access Concerns

A material consequence of the proposed LCZ application is its interaction with the dwelling access standard in the State Planning Provisions.

SPP clause 20.4.3 requires, at both the Acceptable Solution (A1) and Performance Criterion (P1) level, that new dwellings have frontage or legal access — by right of carriageway — to a road maintained by a road authority. Under the SPPs, a road authority means, for local roads, the relevant council under the Local Government (Highways) Act 1982. Private access tracks, unvested Crown roads, and rights of carriageway over third-party land do not satisfy this definition, regardless of their physical adequacy or length of use.

Under KIPS 2015, this constraint did not exist. The ELZ expressly accommodated access via private rights of carriageway of no less than 3.6 metres, with no requirement that access terminate at a council-maintained road. A single dwelling was a permitted use within a building area on a sealed plan, and discretionary otherwise — either pathway was achievable on privately-accessed land. The transition to LCZ imports a standard that forecloses what the previous scheme expressly permitted. That loss falls entirely on landowners whose parcels are physically and legally unchanged — it is not a consequence of their landscape character, but of zone selection.

It is significant that Council has itself acknowledged this problem in its Section 35F Report, conceding that the road authority access requirement produces unreasonable outcomes on transitioning ELZ land and that it has formally raised the matter with the State Planning Office. That concession — that the standard is not fit for purpose in this context — should weigh against a zoning decision that subjects landowners to its burden in the interim.

The Rural Living Zone does not carry this consequence. SPP clause 11.5.1 P2 and P3 require a contextual, merits-based assessment of whether access is sufficient for the intended use — having regard to topography, length, emergency vehicle access, and the pattern of established development — without requiring that the access terminate at a road authority-maintained road. A privately-accessed parcel that fails the LCZ threshold can satisfy the RLZ standard on its merits.

The Commission is asked to find that applying the LCZ to privately-accessed ELZ parcels where residential use is the established primary intention would disproportionately extinguish development rights without planning justification, and that the RLZ is the appropriate zone for those parcels.

1. Kate Heckleman — codes can manage landscape values (Day 19 - 02:21:26)

During the Irene Inc expert's evidence in chief, the following was said about the role of the Natural Assets Code and Scenic Protection Code:

"the scenic protection area code, the natural assets code, could also be mechanisms to appropriately manage those values"

The expert then criticised Council's approach, saying it had made a "pretty global determination of limitations of the application of the rural living zone" that had "ruled out the ability of scheme provisions to consider how scheme provisions might appropriately manage landscape values."

2. Kate Heckleman — Natural Assets Code provides controls not dissimilar to LCZ (Day 19 - 02:25:21)

The expert made a direct comparison between the Natural Assets Code and LCZ vegetation protections:

"the natural assets code in considering native vegetation has limited the ability to contribute to appropriately managing landscape values where the site is not mapped by the overlay — so in a practical sense most of Kingborough at this point in time is mapped where there is priority vegetation within the priority vegetation mapping, and the standards of that code of the natural assets code would provide controls that are not dissimilar to some of the landscape protection controls which are available in the landscape conservation provisions and also in the environmental living provisions as they relate to minimising the removal of vegetation"

The expert qualified this by saying the provisions are "not exactly like for like between the two schemes" but concluded that the Natural Assets Code's extent of coverage is "a scheme-wide issue as opposed to something that would stop you necessarily from assigning a particular zone."

3. Panel question — direct challenge on the role of codes (Day 19 - 05:40:02)

This is the most significant exchange. A panel member asked directly:

"What I'm trying to understand is if you've got a land, a zone that might be rural living and you've got a natural asset code sitting on top of that, I can't think of a single use that would require the trees removed. It's the development that would require trees to be removed and then you've got a trigger in which to assess that development against the appropriateness of removing those trees. So why do we care? Why do we care what the underlying zone is if we're protecting the trees which are managed by a code? I'm just trying to understand the connection between an established identified landscape value which we're going to work through — that's not a tree because the trees are covered — and what use could compromise it?"

The expert's response agreed in substance: "I probably agree with you in terms of that it's not so much... there probably are some exceptions where there is the provision of uses that might be considered... but again that likelihood of those things happening on the land that we're talking about in terms of the environmental living zone land is again probably quite limited in its ability to significantly restrict the management of the appropriate management of the landscape values."

4. Panel clarification — LCZ purpose is not to protect vegetation (Day 19 - 05:44:19)

A second panel member then made a sharp distinction:

"the application of the landscape conservation zone is not to protect the vegetation — that's the natural asset code's job. The landscape conservation zone is to protect our landscape values so whilst there is some very strong similarities between the two that we do have to try to compartmentalise those differences."

This is a critical passage — a panel member explicitly stated on the record that LCZ's purpose is not vegetation protection, that is the Natural Assets Code's function. This directly supports the argument that LCZ is not the necessary mechanism for managing the natural values the submissions are concerned with.

5. Panel question — coastal bushland values and codes (Day 20 - 00:35:14)

Earlier in proceedings a panel member asked:

"the established or recognised landscape values that we've got in here relate to bushland on coastal areas and significant biodiversity — specifically why can't the codes manage that? Doesn't matter what development you put on there, it's still going to be on the coast and the bushland components presumably will be managed by the natural asset code on the face of it. What cannot be managed through those codes for the eastern side of the peninsula specifically?"

The expert's answer focused on building height under the RLZ as a risk where the Scenic Protection Area overlay was not yet mapped, and acknowledged that priority vegetation is "the mechanism that's provided in the scheme to be able to regulate the clearing."

6. Panel exchange — vegetation removal risk under RLZ (Day 20 - 02:31:29)

During cross-examination a panel member pressed directly:

"if you're saying that the risk is associated with the removal of vegetation, but that removal of vegetation is going to be subject to the provisions of the Natural Assets Code presumably, what is the risk?"

The expert's response shifted away from vegetation to uses — visitor accommodation, fuel sales — as the concern, and acknowledged "while there are mechanisms in the scheme to address it..." before trailing off. The panel member followed up by asking what specific uses were the concern, given existing residential occupation.

PART F – CONCLUSION AND RELIEF SOUGHT

For the reasons set out above, I submit that:

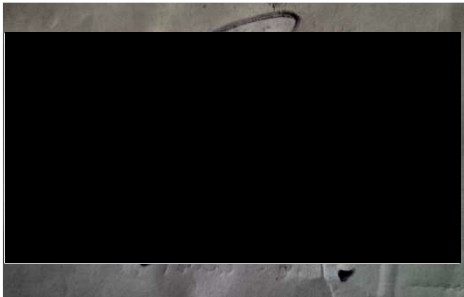
1. The application of the LCZ to my property is inconsistent with the Zone Guidelines (Guideline No. 1) and does not satisfy the requirements of section 34 of LUPAA.

2. The LCZ is prohibited by Zone Guideline LCZ 4(a) where, as here, the priority of the land is residential use.
3. The Rural Living Zone satisfies the criteria in Zone Guidelines RLZ 1(a) and RLZ 2(b) and is the appropriate zone for my property.
4. Any landscape values identified in the locality can be appropriately managed through existing overlay controls without resort to LCZ.
5. That an error has occurred in The Ireneinc Report regarding the Flowerpot locality insofar as there are clearly 10 properties with well-established dwellings on lots between 1 – 15 ha that indeed do constitute a rural settlement. This has consequences for the rest of the decision tree used directly to determine their LCZ decision for this property.
6. That Attachment A be considered as highly pertinent to my property as to why Flowerpot ought not be determined as LCZ.

I respectfully request that the Commission:

- Determine that the draft Kingborough LPS should be modified to include my property within the Rural Living Zone subcategory C; or Rural Zone, whichever is the least restrictive.
- If the Commission proposes any alternative outcome, that I be provided with an opportunity to respond before any final determination is made.
- I request that the folio of the Register at Flowerpot Tasmania 7163, be included within the Rural Living Zone C or Rural Zone whichever is deemed appropriate that is not LCZ in the Kingborough Local Provisions Schedule.

Signed:



Full name: Dr David Andrew Buchanan MA
PhD

Date:

01/05/2026

Contact email /

or

LODGEMENT: Email your completed submission to tpc@planning.tas.gov.au with the subject line: 'Submission — Kingborough LPS Direction 69 — [your property address]'. Include your title reference in the body of the email. The deadline is midnight Monday 4 May 2026.

PART G — ACRONYMS / TERMS USED IN THIS SUBMISSION

Acronym/Term	Meaning
ELZ	Environmental Living Zone
Ireneinc report	Review of the LCZ Kingborough (Review of the Methodology and Zone Application and Locality Baseline and Alternative Zone Evaluation)
LCZ	Landscape Conservation Zone
LPS	Draft Kingborough Local Provisions Schedule
LUPAA	Land Use Planning and Approvals Act 1993
NAC	Natural Assets Code

PVA	Priority Vegetation Area
RLZ	Rural Living Zone
SAP	Specific Area Plan
SPA	Scenic Protection Area
SPC	Scenic Protection Code
STRLUS	Southern Tasmania Regional Land Use Strategy
TPC	Tasmanian Planning Commission
Zone Guidelines	Guideline No. 1 — Local Provisions Schedule: Zone and Code Application

ATTACHMENT A

Inconsistency Analysis — Ireneinc Zone Evaluation

PART 1 — SUBMISSION IDENTIFICATION

Submission reference	David Andrew Buchanan — [REDACTED] Flowerpot Tasmania 7163 — <i>Direction 69</i>
Property title reference	[REDACTED]
Locality	Flowerpot ...
Submission template used	Contest LCZ seek RLZ or RZ
Date of attachment preparation	02/05/2026

PART 2 — PURPOSE OF THIS ATTACHMENT

This attachment has been prepared to support the written submission identified above. It provides comparative analysis of the Ireneinc zone evaluation framework as applied to the landowner's locality, compared against one or more similar localities that received a different — and more favourable — zone outcome using the same or very similar evidence.

The purpose is to demonstrate to the Commission that the Ireneinc recommendation for this locality is inconsistent with the outcome produced by the same evaluation framework applied elsewhere in the municipality, and that there is no clear reason to treat this locality differently from the similar localities identified.

This attachment should be read alongside the written submission, in particular the arguments set out in Part D (D7 — Inconsistency in the Ireneinc evaluation framework) and Part E (Locality-Specific Context) of that submission.

PART 3 — HEARING EVIDENCE SUPPORTING THIS ANALYSIS

The following statements from the Day 19 and Day 20 TPC hearings directly support the use of a comparative inconsistency analysis as evidence in a submission:

Speaker and timestamp	Statement and relevance
Delegate Rohan Probert [01:07:48]	Comparing Tinderbox East (LCZ) with Howden (RLZ): 'They are very similar if you only look at the description of the landscape values... one we say they can be managed and the other one we say they can't be managed. What we really need to say is the difference between those two.' This statement acknowledges that the Ireneinc framework produced inconsistent outcomes from very similar evidence, and that the difference between localities needs to be clearly explained. This analysis does exactly that for this locality.
Delegate Dan Ford [02:33:54]	At Kettering West: effectively forced the concession that the Priority Vegetation Area (PVA) overlay does the landscape-protection work, not the zone. This is directly relevant where PVA applies to the subject property and LCZ has been

	recommended — the same logic that produced RLZ at Kettering West Groombridges applies.
Kate Heckelmann (Ireneinc) [05:53:00]	Conceded that the evaluation framework is a tool, not a legal requirement. Submissions can move away from it if supported by good evidence. This confirms that identifying inconsistencies in the framework's application — as this analysis does — is a legitimate basis for a submission.
Chair Nick Heath [06:45:48]	Confirmed that the Commission will decide on the basis of section 34 LUPAA criteria (Zone Guidelines and LPS criteria), not on the basis of Council's position or the Ireneinc framework alone. The Zone Guidelines require consistent application of zone criteria — inconsistency of the kind documented in this attachment is therefore directly relevant to the Commission's assessment under the law.

PART 4 — MOST RELEVANT COMPARISONS FOR THIS SUBMISSION

The following table identifies the specific comparisons within the attached Inconsistency Analysis that are most directly relevant to this submission. The full comparative tables for this locality appear in the pages that follow.

Characteristic compared	Comparable Locality Kettering East and Oyster Cove	Why this comparison supports my submission
Landscape Value Description	Kettering East and Oyster Cove	Regarding the characteristic 'landscape value description': Kettering and Oyster Cove also has the same ridgeline bushland that Flowerpot has and, that Flowerpot also has coastal interface with an identified settlement along Fleurty's Lane. The connection they speak of from Birches Bay to Gordon does not commence at Birches Bay but is consistent along the ridgeline for the entirety of the Channel region and is known as the Herringbone Ridge. The same manageability identified for Kettering East and Oyster Cove would therefore by definition pertain equally to the Flowerpot locality as the ridgeline areas are contiguous. Similar native vegetation is apparent throughout all these localities and therefore similar scenic and landscape values would apply.

Settlement Characteristics	Kettering East and Oyster Cove	Settlement characteristics: the cluster of which Ireneinc speak for [REDACTED] Flowerpot is as previously pointed out that at least 10 contiguous properties with well-established dwellings that are between 1 – 15 ha in lot size exist and that by definition renders Flowerpot to have settlement characteristics.
Lot sizes	Kettering east and Oyster Cove	While lot sizes are slightly larger higher in size in properties west of 150 [REDACTED] the well-established Flowerpot settlement from 10 – 150 Gallaghers Road of which my property is apart thereof is from 1 -10 ha that is directly comparable to both Kettering East and Oyster Cove. My specific property is but 8.315 ha in size.
Risk rating	Kettering east and Oyster Cove	The Risk rating of medium for Kettering East and Oyster Cove and Medium-High for Flowerpot attained here by Ireneinc is by their own admission subjective and not clearly articulated or conceptually clarified. Moreover, pertaining to my specific property where does the exact and specific property application of medium as opposed to high cut off? Nearly half my property is cleared or given long established exotic gardens. Moreover, given a similar ridgeline and elevation and therefore corridor to both Kettering East and Oyster Cove, I submit that my property is likely medium risk and therefore directly comparable to their RLZ standards as assessed by Ireneinc in their case.

DP6 Codes	Kettering East and Oyster Cove	The DP6 codes to manage landscape values Ireneinc is again inconsistent here in their conclusions. My property has the same codes and minimum lot size as those given RLZ in both Kettering East and Oyster Cove.
Key Differentiators	Kettering East and Oyster Cove	And lastly their key differentiator(s) used that Ireneinc argue for is: 1. that the ridgeline must be maintained; 2. Flowerpot's differences to Kettering East and Oyster Cove are that the latter have a consistent settlement pattern; 3. existing blocks already fully used; and, 4. can be managed by codes. I submit that there is a well-and-long-established settlement pattern in [REDACTED] apart of which my property and its residential dwelling have been fully used since the late 1890s. This differentiation by Ireneinc between Kettering East and Oyster Cove and my property as part of the Flowerpot settlement is not cogent or valid here on all four differentiations.

PART 5 — PROPERTY-SPECIFIC DIFFERENTIATION

This attachment identifies inconsistencies at the locality level. The submission itself provides the property-specific evidence explaining why those inconsistencies apply to this individual property. In summary, the following characteristics of this property are consistent with the similar localities that received RLZ, and are not consistent with the reasons cited by Ireneinc for LCZ retention:

1. My lot is 8.315 ha — consistent with the 1–10 ha range accepted for RLZ at Kettering East and Oyster Cove
2. This places my specific property within the range for which Ireneinc found codes manage landscape values adequately.
3. My lot is substantially cleared with an existing dwelling with outbuildings and also in a steep gully and therefore does not display the elevated vegetated ridgeline character cited as the basis for LCZ retention.
4. Priority Vegetation Area overlay applies to my lot — consistent with Kettering East and Oyster Cove where the TPC found PVA does the landscape-protection work.'

PART 6 — VERIFICATION AND PRIMARY SOURCES

All comparisons in this attachment can be verified against the following primary source documents, which are publicly available:

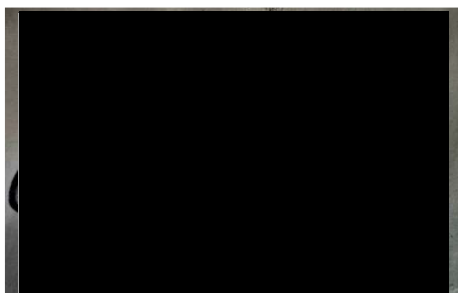
- Ireneinc Locality Baseline and Alternative Zone Evaluation (available on the TPC website)
- Ireneinc LCZ Review and Findings Report (available on the TPC website)
- TPC Day 20 hearing recording — Kingborough Council YouTube channel (available until midnight 19 June 2026)
- Section 8A Guideline No. 1 — LPS Zone and Code Application (available on the TPC website)

PART 7 — DECLARATION

I confirm that:

1. This attachment has been prepared to support a formal written submission to the Tasmanian Planning Commission in relation to the Kingborough Local Provisions Schedule (Direction 69).
2. The comparisons contained in this attachment are based on publicly available Ireneinc reports and TPC hearing records, and I have made reasonable efforts to ensure accuracy.
3. I am the owner or authorised representative of the property identified in Part 1 above.

Signed:



Full name: Dr David Andrew Buchanan

Date:

[Redacted date]

Contact email / phone:

ATTACHMENT B

Inconsistency Analysis — Ireneinc Zone Evaluation

⚠ DEADLINE: Submissions must be lodged by midnight Monday 4 May 2026. Complete, sign and attach this cover note as the first page of Attachment A to your submission. Delete all amber instruction boxes before attaching.

IMPORTANT DISCLAIMER: This analysis has been prepared to support a written submission to the Tasmanian Planning Commission. It represents a personal analysis of publicly available Ireneinc reports and hearing records and is NOT professional planning advice. All references to Ireneinc locality reports and hearing transcripts should be verified against the primary source documents before being relied upon. The primary documents — Ireneinc Locality Baseline and Alternative Zone Evaluation, the Ireneinc LCZ Review and Findings Report, and the Day 20 TPC hearing transcript — are publicly available on the Commission's website and Kingborough Council's website.

PART 1 — SUBMISSION IDENTIFICATION

Submission reference	Residents of Gallaghers Road Flowerpot Tasmania 7163
Property title reference	As a Settlement
Locality	Flowerpot ...
Submission template used	Contest LCZ seek RLZ or RZ
Date of attachment preparation	01/05/2026

PART 2 — PURPOSE OF THIS ATTACHMENT

We, the undersigned residents and landowners of Gallagher Road, Flowerpot, submit this statement in support of the proposed rezoning of this area from Landscape Conservation back to Rural Living.

Gallagher Road is a well-established residential settlement comprising more than ten continuous residences. The area demonstrates the defining characteristics of a rural living community, including permanent dwellings, maintained access roads, active land use, and ongoing community presence, with families of young children using the local school.

This established settlement pattern aligns more closely with the Rural Living zoning designation, which better reflects existing land use and the expectations of residents who live and maintain properties along this road. The current Landscape Conservation zoning does not accurately represent the developed and inhabited nature of Gallagher Road, nor the consistent pattern of residential occupation that has been present for many years.

By reinstating the Rural Living zoning, the Council would be acknowledging the genuine residential character of this locality and supporting fair and consistent land-use planning for current and future residents.

PART 3 — COMPARATIVE SETTLEMENT AREAS

Please see below the comparative areas/ streets that have been considered Rural Living Zone as they are similarly using their land for primarily residential purposes.

Suburb	Street
Kettering east	[REDACTED]
Oyster Cove	[REDACTED]

PART 4 — GALLAGHERS ROAD RESEDENTS

Residents of Gallaghers Rd, Flowerpot

Names of residents	Address	Signature of one household member
⇒ Name of all persons residing	⇒ Full Address	
Rachel Clohessey	[REDACTED] Flowerpot,	[REDACTED]
Ryan Clohessey	TAS 7163	[REDACTED]
Henry Clohessey	[REDACTED]	[REDACTED]
Nicola Clohessey	[REDACTED]	[REDACTED]
DAVID BUCHANAN	[REDACTED]	[REDACTED]
CHRISTINA BULEY-SHADEL	FLOWER POT TAS 7163	[REDACTED]
ASTRID BULEY	[REDACTED]	[REDACTED]
LOUIE BULEY	[REDACTED]	[REDACTED]
Angelika Emily O'Leary	[REDACTED]	[REDACTED]
Ron Bens	Flowerpot Tas 7163	[REDACTED]
Narissa Betts	[REDACTED]	[REDACTED]
Beryl Tadarofi	Flowerpot 7163	[REDACTED]
Frank Rangelosi	[REDACTED]	[REDACTED]
Peta Annear	[REDACTED]	[REDACTED]
Toby Annear	Flowerpot 7163	[REDACTED]
Louise Annear	[REDACTED]	[REDACTED]
Joe Annear	[REDACTED]	[REDACTED]
Evan Brightman	[REDACTED] Flowerpot	[REDACTED]
Loani Brightman	7163	[REDACTED]
Jade Brightman	[REDACTED]	[REDACTED]
Tasha Brightman	[REDACTED]	[REDACTED]
Nicola Hughes	[REDACTED]	[REDACTED]
Andrew Hughes	[REDACTED]	[REDACTED]
Hope Hughes	[REDACTED]	[REDACTED]
Wilfred Hughes	Flowerpot 7163	[REDACTED]
Joan Hughes	[REDACTED]	[REDACTED]

Diane + Steve Summers	Flowerpot Tas 7163	[REDACTED]
Tim	[REDACTED]	Due to bereavement N/A
	[REDACTED]	N/A
⇒ A		
did further rows as needed		

PART 5 — DECLARATION

I confirm that:

- This attachment has been prepared to support a formal written submission to the Tasmanian Planning Commission in relation to the Kingborough Local Provisions Schedule (Direction 69).
- The comparisons contained in this attachment are based on publicly available Ireneinc reports and TPC hearing records, and I have made reasonable efforts to ensure accuracy.
- I am the owner or authorised representative of the property identified in Part 1 above.

Signature of owner/authorised representative	Date: 2/5/2026 Contact email / phone:
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LODGE: Email your completed submission and Attachment A to tpc@planning.tas.gov.au with the subject line: 'Submission — Kingborough LPS Direction 69 — [your property address]'. The deadline is midnight Monday 4 May 2026. Attach only the locality section of the Inconsistency Analysis that is relevant to your property — not all 20 sections.