

**From:** [jenifer.crawford](#)  
**To:** [Contract Planner](#)  
**Subject:** Submission re LPS Dolphin Sands Specific Area Plan  
**Date:** Saturday, 15 February 2020 7:19:37 PM  
**Attachments:** [GSB LPS Dolphin Sands.docx](#)

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Dear Planner

Please find attached my submission re LPS concerning Dolphin Sands.

Kind Regards

Jenifer Crawford

## **GSB – P1.0 Particular Purpose Zone – Dolphin Sands**

**GSB-P1.1 Zone Purpose** – No Change

**GSB-P1.4 Use Table** – No Change

**GSB-P1.5 Use Standard**

GSB-P1.5.1 Amenity – No Change

GSB-P1.5.2 Visitor Accommodation

I find P1 (b) ambiguous - does the one building referred to mean in addition to a residential dwelling or is there only to be one dwelling per property? It would be good if this Clause could be clearer in its intent.

I believe there should only be one dwelling/residences per property. The main reasons I believe dwellings should be limited in the Dolphin Sands area is the extra demand for vegetation removal to comply with bushfire management plans as well as the likelihood of there being more people residing in the area during high fire risk times. There is also a high risk of inundation of property in the future which if there is more than one dwelling per property a greater financial burden on future ratepayers re mitigation or compensation costs would be created. An increase in dwellings would also put further pressure on the local aquifer re increased possibility of contamination and/or greater domestic use of the groundwater.

**GSB-P1.6 Development Standards for Building and Works**

GSB-P1.6.1 Building Height

A1 Building Height must be no more than 5m. – No Change

P1 - **Change - NO PERFORMANCE CRITERION**

**GSB-P1.6.2 Setback**

A1 and P1 – Frontage setback – No Change

A2 - No Change

P2 - (a) No change

P2 - (b) No change

P2 - (c) **DELETE**

**To imply that it is okay to allow an applicant the same regulations because their neighbour was allowed certain setbacks, say 30 years ago, is logically wrong in fact it is ironic to have a new scheme that allows significant digression from what has been identified as desirable is a nonsense.**

**Also retaining P2(b) allows a reasonable degree of flexibility to an applicant that is unable to met the Acceptable Solution criteria.**

**GSB-P1.6.2 A3 - Change - Building setback to Nine Mile Beach Crown reservation must not be less than 20m with the exception of small-scale building extensions to already existing buildings. These small-scale extensions may not be closer to the Nine Mile Beach Crown Reservation than the existing building.**

**GSB-P1.6.2 P3 - Change - No Performance Criterion**

GSB-P1.6.2 A3 and P4 - No Change.

### **GSB-P1.6.3 Building Design**

A1 and P1 - No Change

A2 and P2 - No Change

### **GSB-P1.6.4 Frontage Fences**

A1 and P1 - No Change

### **GSB-P1.7 Development Standards for Subdivision**

GSB-P1.7.1 Subdivision

A1 No Change

P1(a) No Change

P1(b) **DELETE**

P1(c) **DELETE**

With this area being in close proximity to an internationally recognised wetlands (Moulting Lagoon) as well as properties sitting atop a vulnerable groundwater system coupled with being a high risk fire-prone area and a high risk coastal inundation area there should not be any loopholes in the Dolphin Sands Specific area plan to increase the risk and financial burden on ratepayers by having a default subdivision clause. There also should be included a no strata title clause in the SAP if that is all possible.

By making no modifications, no deletions or no changes to the current Particular Purpose Zone – Dolphin Sands would mean the following objectives of the **Southern Tasmanian Regional Land Use Strategy 2010 - 2035** would be compromised because: -

BNV 1.6 Would not be preserving climate refugia where there is scientifically accepted special data.

BNV2.2 Would not minimise clearance of native vegetation communities that provide habitat for threatened species, (wedgetail eagle, Tasmanian Devil etc)

WR 1 Would not be protecting and managing the ecological health, environmental values and water quality of surface and ground water, including water ways, wetlands and estuaries.

C1 Would not be maintaining, protecting and enhancing the biodiversity, landscape, scenic and cultural values of the local coast

C2 Would not be ensuring use and development in the Dolphin Sands coastal area is responsive to effects of climate change including sea level rise, coastal inundation and shoreline recession.

MRH 1 Would not be minimising the risk of loss of life and property from bushfires in the Dolphin Sands area.

MRH 1.5 Would allow new development (at the rezoning stage) in the Dolphin Sands bushfire prone area where necessary vegetation clearance for bushfire risk reduction would not be in accordance with policies on biodiversity and native vegetation.

CV 1 as the LPS stands it does little to encourage recognition, retention and protection of Aboriginal heritage values within the area for their character, culture, sense of place, contribution to our understanding history and contribution to the region's competitive advantage.

CV 1.3 it does not avoid the allocation of land use growth opportunities in the Dolphin Sands area where Aboriginal cultural heritage values are known to exist.

Dolphin Sands has been my place of residence for over 25 years and during that time there has been many changes, many houses built, four significant bushfires, 2 drought declared periods in an area that could be described as a arid micro climate but by far the most relevant change has been the increase in knowledge on climate change and its impact on the natural and built environment. Dolphin Sands is an area that will be significantly impacted by the changing climate and the LPS needs to take a firm stance to reduce as far as possible the environmental impact from human habitation as well as protecting residents safety, amenity and assets.