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Dear Ms Nettlefold

I make submissions on the following three areas in the Glamorgan Spring Bay draft Local Provision Schedule:

1. GSB-S2.0 Special Area Plan for the Bicheno Golf Club
2. GSB-P5.0 Particular Purpose Zone – North Bicheno Future Urban
3. GSB-P2.0 The Gulch

I have been a resident of Bicheno since 1988, living at the Denison River until 2003 and since then at 70 Tasman Hwy Bicheno.

I am very grateful that I have been able to live in this beautiful part of the world. However, I was very early confronted by the fact that despite land use strategies and the wonderful language therein, the sustainable ecological health of this region will rarely be protected by decision makers at any level of government or in the courts.

I with others, have seen proposals for completely inappropriate development on the coastal lands along the Denison Beach for:

1986 - a 70 metre windmill & tourist facility. Appealed and approval denied

2005 – an amendment to the plans to rezone land at 18482 Tasman Hwy, north of Bicheno from coastal rural to resort residential and permit application for the use and development for 15 visitor accommodation units, manager's residence, and wine bar/café. After 3 applications, sundry appeals, finally approved.

2011 – Golf Club-residential development. 61 home, new golf club premises and an additional 9 holes. Approved after appeals. The land was subsequently sold under a mortgagee sale.

In addition to these significant proposals, there have been numerous other proposals which have urbanised this coastal town of Bicheno with associated destruction of vegetation, small lot development and associated problems eg storm water run-off discharging to small creeks and into the sea, poorly planned provision for future sustainability in terms of water and waste . The worst example being in 2003 Diamond Island Heights a 55 lot subdivision adjacent to where I live.

My submissions are below.

Thankyou. Helen Preston

1. GSB-S2.0 Special Area Plan for the Bicheno Golf Club

I submit that this proposal should be rejected and completely removed from the Glamorgan Spring Bay Local Provision Schedule.

Background

The Golf Club SAP was approved in 2012 after representations and appeals by local residents, Bird Life Tasmania and the Department of Primary Industry Parks, Water and Environment.

Rationale

I consider the decision to approve a 61 lot residential development on land on the coastal side of the Tasman Hwy, outside the town boundary, adjacent to highly sensitive endangered bird-breeding habitat was **completely outrageous**.

In 2012 the relevant State and Local Government planning documents delineated planning principles which should have been sufficient to deny approval:

Strategic planning principles contained in:

The Land Use Planning and Approvals Act 1993
The Tasmanian State Coastal Policy 1996
The Southern Tasmania Regional Land Use Strategy 2010 – 2035
Vision East 2030 Land Use Framework
Glamorgan Spring Bay Community Strategic Plan 2013
Glamorgan Spring Bay Council Bicheno Coastal Reserves *Native Flora and Fauna Management Plan 2014-2019*

The key planning principles which I consider were ignored in the decision to approve the Golf Club SAP in 2012:

1. **Compact** and contained planned urban residential, visitor accommodation and commercial development to avoid 'ribbon' development and unrelated cluster development along the coast not only for protection of the coastal environment, but also for the scenic amenity. The Golf Club SAP is a cluster development outside the town boundary, it is not low-density or semi-rural as described in the proposal and will be visible from the Tasman Hwy.
2. **Future Land availability** – land for the above purposes should be made available within town boundaries where municipal services for example, water and waste disposal are provided. The Golf Club SAP did not establish a need for further residential land to be made available. In 2020 Bicheno has approximately 98 residential lots vacant. On present takeup this is 35 yrs supply. Further, GSB-P.1 North Bicheno Future Urban provides for future residential/visitor accommodation which will be satisfy demand after 2055.

3. **Environmental sustainability** – planning for and management of the conservation of the diversity of all native flora and fauna and their habitats particularly in the coastal zones. The Golf Club SAP would significantly impact the coastal and dune vegetation through clearing for homes, roads and services.
4. **Legal responsibility for the protection of flora and fauna** classified as endangered or of high conservation significance. The Golf Club SAP will mean that the adjacent beach breeding area for endangered and threatened shorebird species, Red capped plover, Hooded plover and Pied oyster catchers will be severely compromised by human and domestic animal intrusion. The Status report of these birds 2011/12 says that ‘the beaches in Glamorgan Spring Bay are among the most important beaches in Tasmania for birds to breed, feed and rest. The southern Denison Beach was noted as having only 5 breeding pairs of hooded plovers in November 2011. Protection of our shorebirds is even more critical in 2020 with climate change resulting in higher sea-levels and storm surges causing further pressure on habitat.
5. **Sustainable resource planning** – water, waste disposal. The Golf Club SAP application stated that the annual potable water consumption would be 25 million litres, of which 4 million would be supplied by the development. At that time, Southern Water were to contract to provide water on a non-guaranteed ‘restricted supply’ basis. TasWater would no doubt be obligated to also supply water. The capacity of the Bicheno water reservoir when full is 2,590 million litres. **However**, TasWater recently declared Stage 1 water restrictions for Bicheno, which are triggered by there being capacity for only 90 days @ an estimated supply need of close to 1million litres per day. Clearly there is no local capacity to supply the Golf Club SAP development.

2 GSB-P5.0 Particular Purpose Zone – North Bicheno Future Urban

Submission:

I recognise that Bicheno will grow over the coming decades as it has over the last 35 years during which time I have lived in the area. I make this submission from my observations over this time that planning for future development has been ad hoc with little vision shown and a considerable loss of habitat for all wildlife. I am extremely concerned that the natural and environmental values which underpin ecological health of the coast and hinterland must be central to our thinking about development. The health and well-being of the environment and the economy of the region depends on planning for sustainable development.

GSB-5.1 Zone purpose

I

think that the Zone purpose proposed could be re-drafted to properly provide for sustainable development.

My suggested objectives for the zone are:

1. To provide for the development of sustainable, high quality visitor accommodation and residential uses
2. To provide for the protection and maintenance of a high standard of environmental management in a sensitive coastal environment
3. To ensure the protection of dune morphology and ecology from detrimental impacts
4. To provide for development which has a positive relationship to the adjacent high value environment, particularly the Fairy Penguin colonies along Redbill Beach,
5. To ensure that the non-residential/visitor accommodation uses are of a small scale which are of a scale respectful of the special area
6. To ensure that development of the built structures is appropriately designed and blend into the landscape
7. To ensure minimal visual impact upon surrounding locations including the Tasman Highway corridor.

My specific concerns which I consider justify a complete re-drafting of the Zone Purpose GSB-P5.1 are below:

GSB-P5 1.1

I agree that it is very important to provide for future residential and visitor accommodation in Bicheno and this area may offer the ideal site, however the words '*in a manner sympathetic to the coastal location*' lack clarity and are inadequate in protecting the natural assets of this beautiful area adjacent to Redbill Beach. Further the use of the word '*sympathetic*' provides for uncertainty and potential litigation.

I submit that the values underlying the term 'sympathetic' must be clearly defined. Such a 'purpose' requires clear definitions of the types of development which would protect these values. Egs small scale visitor accommodation, low rise residential development and SMALL scale Food Services, definitely not 'large scale' – see my point below.

I have great concern over the term “**large scale integrated complexes comprised of multiple uses**” as this could include developments that have a significant impact on the environment and distort the integrity of the township. Already existing in the township is the Silver Sands renamed 'Tas Shacks' which occupies the most glorious position in Bicheno on Peggy's Point. At this date, it is closed awaiting re-development.

I submit that “**large scale integrated complexes comprised of multiple uses**” would severely compromise the environment and wildlife in this coastal area which nominally, are protected under the Natural Assets Code and should be **REMOVED** from GSB-P5 1.1.

GSB-P5 1.2

“To **reinforce the activity centre** at Bicheno”: I am concerned about the implications of this statement. It implies a spread of the shopping and business centre and I oppose this zone being used in this way. Bicheno township shopping and business precinct has multiple vacant buildings, some of which are large and several are buildings which are currently used other than as commercial shopfronts. There are also several large vacant lots zoned commercial.

The several large lots in Bicheno zoned Commercial will cater for commercial development (and parking) for decades – to at least 2050.

Specifically: There are the current dormant premises of The Silver Sands ('Tas Shacks') which is a former hotel-motel on a large block of land on Peggy's Pt; a substantial block on the corner of Foster and Burgess Streets; the land on Morrison St and Tasman Highway opposite the Uniting Church and other commercial blocks in Burgess St to the north.

GSB-P5 1.3

I submit that the purpose as expressed ‘*To protect environmental values and avoid unreasonable loss of views of, and through the area*’ are extremely vague.

‘*Unreasonable loss*’ – I fear that loss which is ‘*unreasonable*’ does not include the natural environment

I submit that the purpose in 1.3 could be expressed more clearly in order that the environment, its wildlife and extraordinary beauty be guaranteed for the future.

GSB-P5 1.4

“To provide for the efficient **servicing of future development** of the area.”: again I am concerned about what exactly this implies and the scope of development in this highly valued area.

There has been much local discussion on the congestion which occurs on Gordon Street during summer being the main beach access to Redbill Beach.

It may be important for a public beach access to be included in the Zone purposes to address this problem - perhaps a parking area on the highway and a walkway down to the beach. Disability access could be provided for.

I submit that potential 'services' be clearly listed in the **Use Table** – some as Permitted & others Discretionary.

GSB-P5.4 Use Table

Permitted

Residential – I accept this as a permitted use if for single dwelling.

Home-based business – I submit that this use be moved to **Discretionary**

Visitor accommodation – I submit that this use be qualified as small, home based.

Qualifications to all permitted developments should provide for the full protection of the whole ecology of the coastal area with its extraordinary wildlife, including extensive penguin habitat.

Fencing of the coastal dunes on the land side of the zone will be necessary to prevent access of humans and dogs which would negatively impact on the ecology, and also prevent erosion by restricting access to the dunes.

Discretionary

Qualifications to all the 'discretionary' uses must also provide for protection of the values of the coastal area.

I submit that for all 'discretionary' uses the key qualification must be that the scale of any development be limited to *small scale in keeping with the special nature of this zone*. Particularly noted for the use 'Hotel Industry'.

GSB-P5.5 Use Standards

A3/P3 External lighting: Any lighting also needs to take into consideration the impacts on wildlife and habitat.

I submit that all lighting be restricted to specific seasonal hours to reduce impact on wildlife. Residential amenity is necessarily protected and it is equally or more important that impacts on environmental ie wildlife habitats be minimised.

GSB-P5.6 Development Standards for Buildings and Works

A1/P1 Building height: I agree that Building height must be no more than 5m and submit that P1 include '*Building height of 5m must not cause.....*'

GSBC draft LPS maps – comments:

I endorse the comments made by Lucy Landon-Land -

I have also had a close look at the GSBC draft LPS maps and make the following comments.

I note that Coastal Inundation Code is "High" around the Diamond Island point; and "Investigation" (potentially susceptible) behind Redbill Beach, which is the area to be rezoned North Bicheno Future Urban. This raises a vital question which needs to be addressed in the planning provisions – 'provision for wildlife habitat when future flooding/inundation of this area caused by sea level rise coupled with extreme weather events occurs.

Natural assets Code: The whole coastline has been designated Waterway and Coastal Protection Area, as well as Future Coastal Refugia Area.

It is important that any future subdivision/development be generous to the needs of our wildlife and the health of our coastline.

Water

One further concern I have regarding any development of the region is water. As the region continues to suffer from decreased rainfall and the water flow in our rivers declines, will the current water reservoir be sufficient to cope with an increase in population? I have noted some of the issues with Bicheno water supply above in my previous submission. Also will the sewage plant cope with an increase in population? Will the council consider opportunities to recycle grey-water for flushing toilets? Will future developments be encouraged to capture substantial quantities of rainwater into tanks? There are countless state-of-the-art technologies available that improve water conservation and reduce our impact on the environment that need to be accepted and promoted by councils across Australia. I hope that Glamorgan Spring Bay Council considers leading the way!

Thankyou for the opportunity to make a submission on GSB-5.0 Particular Purpose Zone – North Bicheno Future Urban.

It would be wonderful to see visionary long-term development which will provide for a sustainable future.

GSB-P2.0 Particular Purpose Zone – The Gulch

The Gulch, on Crown Land, is an historic, unique and exciting area. Immediately adjacent to a marine reserve, when one steps down the ramp onto the jetty, the noise of the sea birds on Governor's Island is often deafening, the sea air is invigorating, the sea may be racing through the channel between the shore and the island and its not uncommon to see seals fishing, and dolphins playing.

It is also a high value Little penguin habitat, an important part of Bicheno's fragile penguin breeding area. A Tasmanian Heritage Listed Structure (ID 1498) is also in this zone.

What an incredible place this is. Sadly, in the midst of the natural beauty of this special place, over many decades, there have spawned ugly industrial buildings, many of which are partly idle and some very dilapidated. NO protection has been given to the local environment on shore.

The once busy fishing port serves mostly pleasure craft. The slipway has now been removed so that any fishing boat which needs to be taken out of the water for cleaning or maritime inspection must now go to Triabunna or St Helens.

This special area does not exist anywhere else in Tasmania and the immediacy and accessibility of its natural beauty attracts a large number of visitors.

The area is currently struggling from overuse with traffic and parking an issue for locals and visitors. Any expansion of businesses and buildings in this area will put more pressure on this fragile environment.

It is very important that the the Zone purpose protect the unique attributes and values of the area.

GSB-P2.1 Zone Purpose

I submit the following changes to the Zone purposes beginning with the protection of the unique qualities and values of the 'The Gulch'

GSB-P2 1.1 To provide for the protection of the natural environment, the visual amenity and heritage values

GSB-P2 1.2 To provide for the maritime, aquaculture, tourism and related activities

GSB-P2 1.3 To ensure that any development or proposal for new business is restricted to the existing footprint of the built environment and is of a scale which does not impact on the historic and environmental values of the area

GSB-P2 1.4 To ensure that any off-site impact is minimized with priority being given to the protection of wildlife

GSB- P2.4 Use Table

Use Class

PERMITTED **Passive Recreation – I agree.**

I object to **Manufacturing and processing, Resource Development and Resource Processing** (Qualification - if associated with a maritime or aquaculture activity) being included under *Permitted*. These use classes under the GSBC *definition* table do not limit the size of manufacturing or processing nor do the *definition standards* address any potential pollution associated with this type of use and for reasons stated in our opening paragraphs the impact of these type of uses on the Gulch natural visual amenity, Governor Island Marine Reserve and the little penguin habitat must not be classed as *Permitted*.

Use Class

DISCRETIONARY

I object to **Resource Processing and Utilities** being included as *discretionary* as the GSBC *definitions* define these types of use class not in keeping with the Gulch's unique natural amenity and wildlife.

All other uses under *Discretionary* need to remain within the existing building footprints and need precise qualifications which address the concerns in my opening statement.

GSB-P2.5 Use Standards

Hours of Operation, Noise, External Lighting, Commercial vehicle movements & Outdoor Work Areas

These use standards need to provide adequate protection for the Little penguin colony and all wildlife which live in or move through this area. Consultation as to best practices for this site for penguin protection and other wildlife needs to be made in discussion with DPIPWE and Birdlife Tasmania.

Traffic and visitor parking must specifically be provided for. In peak visitor times The Esplanade struggles with traffic and parking for existing businesses and overflows onto the Esplanade. Between dusk and dawn, Little penguins are trying to cross the Esplanade to get to burrows. They become confused and blinded by car lights with some unable to get back to burrows to feed chicks.

GSB-P2.6 Development Standard for Buildings and Works
Building Height, Setback, Building design, Outdoor Storage Areas, Fencing

For the reasons as outlined in my opening statement no new buildings to be built in this area and any renovations or proposals for new business or uses must be created on existing building footprints with no loss of vegetation.

Building renovation height must be not more than 5m and positioned at a lower elevation than The Esplanade with building designs that do not detract from the natural visual amenity. Access to business premises from existing access points and an existing suspended parking area not be repeated or considered a precedent.

During any construction period Little penguin activity needs to be fully considered and prioritised with no loss of habitat or disruption to their breeding cycle. Any fencing used will need to be constructed in such a way as not to impede little penguin movements. Consultation with DPIPWE and Birdlife Tasmania