



Dianne Cowen, Senior Consultant
Gray Planning
224 Warwick Street
West Hobart TAS 7000

5 June, 2018

Ms Marietta Wong
Tasmanian Planning Commission
GPO Box 1691
HOBART TAS 7001

Dear Ms Wong,

**Glamorgan Spring Bay Interim Planning Scheme 2015
Draft amendment AM 2018/07(a) and permit SA 2017/04 - rezone CT 149641/2 -
Rheban Road, Orford from Rural Resource to General Residential and 91 lot subdivision
And
Draft amendment AM 2018/07(b) – rezone CT 149641/1 and CT 117058/2 – Rheban Road,
Orford from Rural Resource to General Residential**

I refer to your direction dated 23 May, 2019 requesting Gray Planning provide a response submission to Council's submission dated 20 May, 2019 on behalf of the applicant to this application, Mr Ben Glidden. The Commission initially sought comment from Council in relation to three specific issues relating to the Southern Tasmania Regional Land Use Strategy 2010-2035 (STRLUS). Gray Planning has since reviewed the information provided and offers the following comments.

1. *An understanding of the extent of the Orford township with reference to the regional strategy*

As noted in the submission prepared by Shane Wells on behalf of Council, there is no clear methodology that can be relied upon to clarify whether the Urban Centre Locality (UCL) or State/Suburb map should be relied upon to determine the current and projected growth rates for dwellings.

Whilst Council leans toward the State Suburb mapping as the most relevant to demonstrate the extent of the Orford township, it is the view of Gray Planning that the UCL is more relevant and useful. The STRLUS defines the population of a township in table 2 (p87) as "**excluding any surrounding rural living areas**". As noted in the State Suburb map for 2016, a significant deviation away from the town centre area exists whereas the remaining areas are predominantly within the areas zoned for residential development (see figure 1 below).



It is considered therefore, that this differing alignment has the effect of distorting the statistics through statistics based upon a different locality.

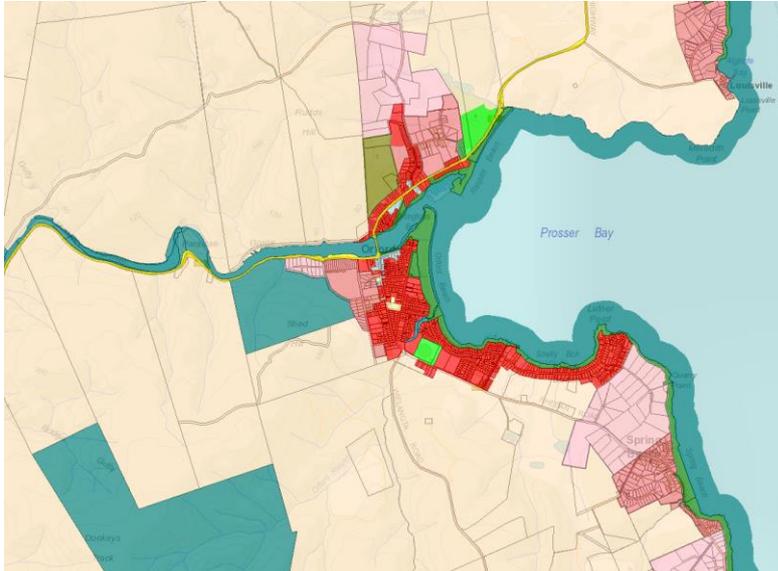
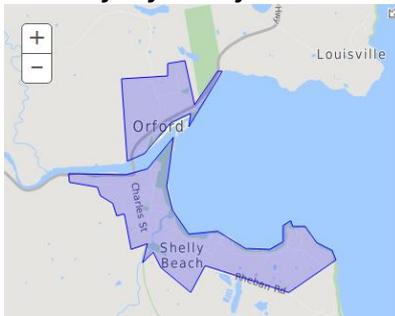


Figure 1: Zone map of Orford township (Source: theList)

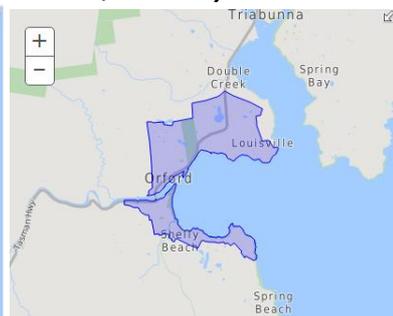
Extent of Orford defined as an “Urban Centre Locality” – (Source: ABS – Quickstats)



2006 –
 245 Occupied dwellings (39.2%)
 380 Unoccupied dwellings (60.8%)



2011 -
 217 Occupied dwellings (30.3%)
 499 Unoccupied dwellings (69.7%)

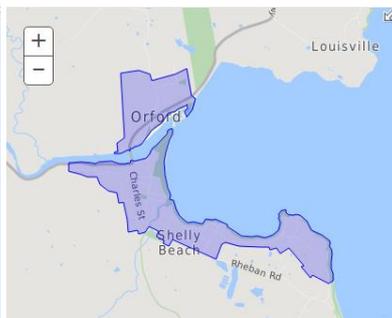


2016 –
 244 Occupied dwellings (31.9%)
 522 Unoccupied dwellings (68.1%)

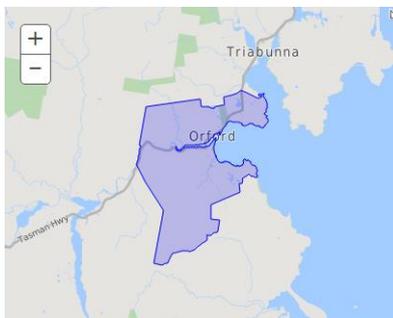
Extent of Orford defined as a “State Suburb” – (Source: ABS – Quickstats)



2006 -
 245 Occupied dwellings (39.2%)
 379 Unoccupied dwellings (60.8%)



2011 -
 216 Occupied dwellings (30.2%)
 499 Unoccupied dwellings (69.8%)



2016 –
 274 Occupied dwellings (32.9%)
 560 Unoccupied dwellings (67.1%)



It is interesting to note that statistics derived from 2006 and 2011 for both the UCL and State Suburb are relatively consistent. The greater difference arises where more rural land is considered under the State Suburb which inflates the number of dwellings in an unhelpful manner.

2. Clarification of the number of dwellings existing at the declaration date of the regional strategy; and

The STRLUS was adopted by the southern Councils in June, 2011. This date coincides relatively consistently with the 2011 census date of 9 August, 2011. It is therefore reasonable to assume that the number of dwellings for Orford at the time of the STRLUS being declared was in the order of 716 dwellings based on the 2011 census data. Of these, 217 dwellings were occupied which represents 30.2% of the total number of dwellings. The number of unoccupied dwellings was 499 which accounts for 69.8% of the total number of dwellings.

Although the statistic maps outlined earlier show a discrepancy in the area for the 2016 maps, the 2011 maps provide a consistent indication of the number of dwellings as of 2011 at 716.

3. Clarification of how many dwellings represent a 10% increase in the number of potential dwellings.

Basing a 10% increase in the number of potential dwellings on the above figures, it is suggested that the increase should be in the range of 71-72 new dwellings. In saying this however, it is critical that consideration be given to the high number of dwellings being utilised for visitor accommodation. Gray Planning agrees with Council's submission where it is clearly articulated that population growth is markedly lower than the rate of dwelling increase, which goes further to support the case that visitor and holiday accommodation is far *"outpacing the demand for permanent homes"*.

Reference is clearly made within the STRLUS as to the differing growth pressures that apply to Orford through the demand for visitor and holiday accommodation. The STRLUS indicates that more detailed local level structure planning is required for Orford to manage the tourism related and residential growth. Orford is accordingly listed in Table 4 – Growth Management Strategies for Settlements (page 90) which indicates special consideration is able to be given to the Orford/Spring Beach area, as it is an area that comprises *"primarily shack/holiday homes"*.

As is demonstrated above in the dwelling statistics for holiday homes based on the ABS data, the rate of unoccupied dwellings for Orford has remained consistently around 67-69% from 2006 until 2016. When looking at the increase in number of occupied dwellings from 2011 to 2016, a total of 27 dwellings has been approved for residential purposes. When subtracting these 27 dwellings from the total number of dwellings calculated within the 10%



range of 72, this leaves a shortfall in the number of dwellings at 45 yet to be achieved for residential purposes.

The methodology set out above should also be applied to the proposed subdivision for Rheban Road where 91 lots are to be created. To carry out a consistent approach, on the premise that approximately 68-69% of these dwellings are likely to comprise visitor or holiday accommodation, the total number of new dwellings likely to be utilised for residential purposes is 29. This is well below the allowable level of 45 new dwellings outlined above which falls under the 10% cap. It is therefore argued that the proposed subdivision will go toward meeting the residential target for new dwellings, however still falls short of the allowable total.

Further relevant comments

Current land supply

As noted in Council's submission, there are parcels of land within the Orford township that may appear to have sufficient area to accommodate subdivision, although many are encumbered by significant constraints that will restrict this subdivision potential, i.e. flood risk, biodiversity issues etc.

In Gray Planning's assessment against the overlay maps under the Glamorgan Spring Bay Interim Planning Scheme 2015, the extent of land available for future subdivision is mapped extensively within the Inundation Hazard Overlay and/or Biodiversity Overlay. These overlays will impede future subdivision and infill development potential, thus reducing the proposition that existing land will have the capacity to provide infill development.

It is also well noted that the level of subdivision potential has not changed since 2015 which was consistent with the potential under the Scheme prior to the GSBIP 2015, and future development requires that land owners "take up" this opportunity. To date, minimal interest appears to have been shown for the desire to subdivide or develop on the existing lands.

In considering the 10% cap on additional dwellings during the lifetime of the STRLUS, if existing parcels of land with subdivision potential are not acted upon and no new land releases are provided, it is very likely that the residential targets for new dwellings will be unable to be achieved. This is where the consideration of existing land needs to be flexible to account for likely constraints or lack of take up.

The location of the proposed subdivision is also within a cycling or walking distance to the township centre and has the advantage of connectivity with surrounding dwellings and the waterfront. As such, the location is considered optimal for future residential and holiday accommodation. In any case, according to Council's submission, this has been well established in the previous study undertaken in the Vision East 2030 Strategy (2009).



Solis Development

It is important to note that the Solis development was approved in 2005 which is fourteen (14) years ago. To date, this development has not progressed which does not encourage confidence in the development ever gaining momentum. In addition to this, location of the Solis development is dislocated from the township and does not appear to form part of the residential area surrounding the local serviced area, e.g. shops, school, bowls club etc.

By considering the potential for a large number of lots that “may” result, consideration should also be given to the different type of development the Solis proposal conveys. It should also be noted that the final number of lots proposed has been rumoured to be decreased should the proposal eventuate. It is agreed that this type of development is quite different to the proposed development as alluded to in Council’s section 35 report.

The land is proposed to remain as zoned Rural with a transitioning Specific Area Plan under the Local Provisions Schedule. It is arguable that the development does not represent a typical pattern of residential development that contributes to a township and is more of a master planned, stand-alone development that is inter-related through compatible uses. Consideration of this development as part of the potential dwelling yield distorts the numbers where it may never occur and provides for a different type of residential development that is dislocated from the township as outlined above.

Current status of STRLUS

As all planners are aware, the current status of the *Southern Tasmania Regional Land Use Strategy* is considered somewhat out of date given the previous lack of formal process to review the strategy. It should also be noted that the STRLUS is in place to guide regional development at a high level as a method of dealing with future development pressures and constraints and should not be considered as a definitive governance document that manages development to the micro level.

Whilst it provides guidance on the potential level of developable land to be made available, where property owners do not “take up” the opportunity to subdivide or develop their land, the level of yield to meet the projected growth anticipated by the STRLUS cannot be met. This is further exacerbated by land constraints which impact on development potential. In our view, a level of flexibility in interpreting the growth scenarios should be considered in order that sufficient levels of housing are provided into the future. By regulating land releases in the stricter sense, there is the potential that projected requirements for housing may never be achieved. This is further exacerbated by the level of holiday accommodation identified for Orford which is anticipated to increase further with the changing regulation and demand associated with Airbnb accommodation.



Potential for modification of amendment

Gray Planning would like to put forward a suggestion to the Tasmanian Planning Commission if it is within the powers of the Commission to facilitate. The request being that the Commission decide to modify the amendment by removing Amendment AM 2018/07(b) from consideration. This would reduce the impact of the potential dwelling yield and was not proposed at the time of submitting the application for a rezoning by the applicant. Given the significant costs associated with preparing and submitting a planning scheme amendment request, it is considered that the initial proposal put forward should be considered on its merit.

Importantly, there remains a linkage between the General Residential zoning proposed and the adjoining General Residential zone to the north. It is therefore not considered that the proposal constitutes a “spot zone” that is out of character with the surrounding area. Utilisation of the Rural Resource Zone as a holding zone for future residential is not an unusual procedure and by retaining the Rural Resource Zone for the adjoining land to the east and west, provides opportunity for future land release when required.

Conclusion

Gray Planning is of the view that there is a clear and concise case that can be made that demonstrates the proposal is consistent with the STRLUS and the growth strategy contained within, relevant to Orford. There is also evidence that visitor and holiday accommodation is reducing the availability of dwellings for permanent residential use which has been recognised within the STRLUS and is impacting on the availability of permanent residences. These permanent residences are required to ensure the sustainability of services within the Orford township.

Thank you for the opportunity to make further submission in relation to Council’s comments and provide the additional information in support of the proposed amendment.

Yours faithfully,



Dianne Cowen BUrbRegPlan RPIA
Senior Consultant, Gray Planning

