
From: Angela Dionysopoulos
Sent: Monday, 4 May 2026 11:59 AM
To: tpc@planning.tas.gov.au
Cc: Mat Clark ; Josh Phillips
Subject: LPS-KIN-TPS - Submission - 65 Graces Road, Oyster Cove

Good morning,

Please find attached a submission in response to letter DOC/26/36829, on behalf of Joshua Phillips and Angela Escolme, in relation to the proposed zoning of their land at 65 Graces Road, Oyster Cove.

Kind regards,



Angela Dionysopoulos

MC Planners

0362887248 | [REDACTED] | www.mcplanners.com.au

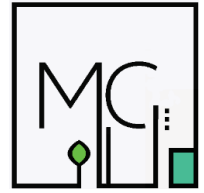
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Hobart Tas. 7000

MC Planners respectfully acknowledges the First Peoples of Australia, who are the traditional owners of the land on which we live and work.

News feed: The City of Hobart Tasmanian Planning Scheme is likely to come into effect in late July.

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MC Planners Ref: 26035

4th May 2026

Delegate Panel - Kingborough Draft LPS

Tasmanian Planning Commission

Via email - tpc@planning.tas.gov.au

Attention: Nick Heath (Chair)

Dear Nick,

KINGBOROUGH DRAFT LPS - RE: DOC/26/36829 - SUBMISSION FOR JOSHUA PHILLIPS AND ANGELA ESCOLME - [REDACTED] OYSTER COVE

This letter provides a formal submission regarding the proposed zoning of [REDACTED], Oyster Cove ([REDACTED]), as provided for by the Commission in its letter DOC/26/36829 dated 2 April 2026. The land is proposed in the Draft LPS to be included in a Landscape Conservation Zone (LCZ). The landowner seeks modification of the proposed zoning to a Rural Zone (RZ).

MC Planners has been engaged to prepare a response on behalf of the landowners Joshua Phillips and Angela Escolme.

Consideration of Ireneinc report on behalf of the Planning Authority in response to Direction 69

The site is included in 'Kettering West' within the report.

Locality Baseline (Ireneinc report section 3.6.1)

The report identifies localised landscape values as follows:

Vegetated fringe and extension of Woodbridge Hill Conservation Area provides a low-key rural character set against the picturesque D'Entrecasteaux Channel. Large areas of bushland and areas containing important native vegetation on hills and elevations behind the Woodbridge settlement provide a continuous vegetated ridge line backdrop and contribute to the heavily vegetated ridgelines which are present along much of the extent of the channel.

The locality is defined by a distinctive ridgeline landscape characterised by a linear settlement pattern that closely follows the natural topography. This landform creates a visually cohesive and legible landscape structure that is strongly shaped by natural features.

The area contains State and bio-regionally significant native vegetation communities and provides important habitat for threatened species, reinforcing its ecological and scenic significance.

Key landscape values identified relate to:

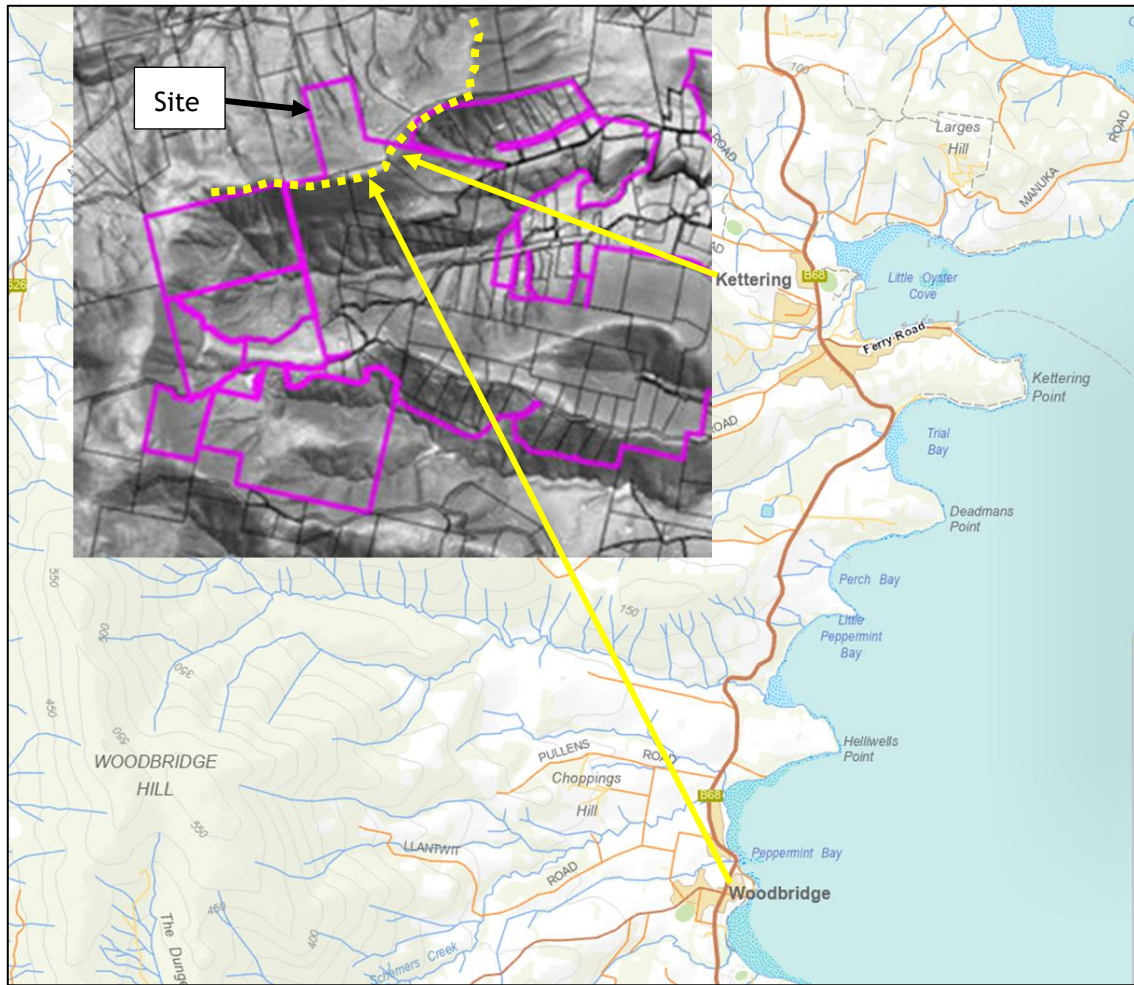


Figure 2 - Location of site relative to Woodbridge and Kettering ridgeline backdrop (source: LISTmap accessed 16/04/2026 and (yellow) marked-up screen capture of the hillshade mapping from Ireneinc report)

As a result of the topography, the site would not be visible from the coastline settlements and does not form part of their bushland backdrop.

If the consideration of landscape values were broadened to account for the possible role of Nichols Rivulet Road as a scenic tourist route, the ridgeline from this perspective does not comprise a ‘visually intact’ bushland landscape, noting that the surrounding land is largely cleared, and for much of the route the view lines are truncated close to the road (Figure 3).

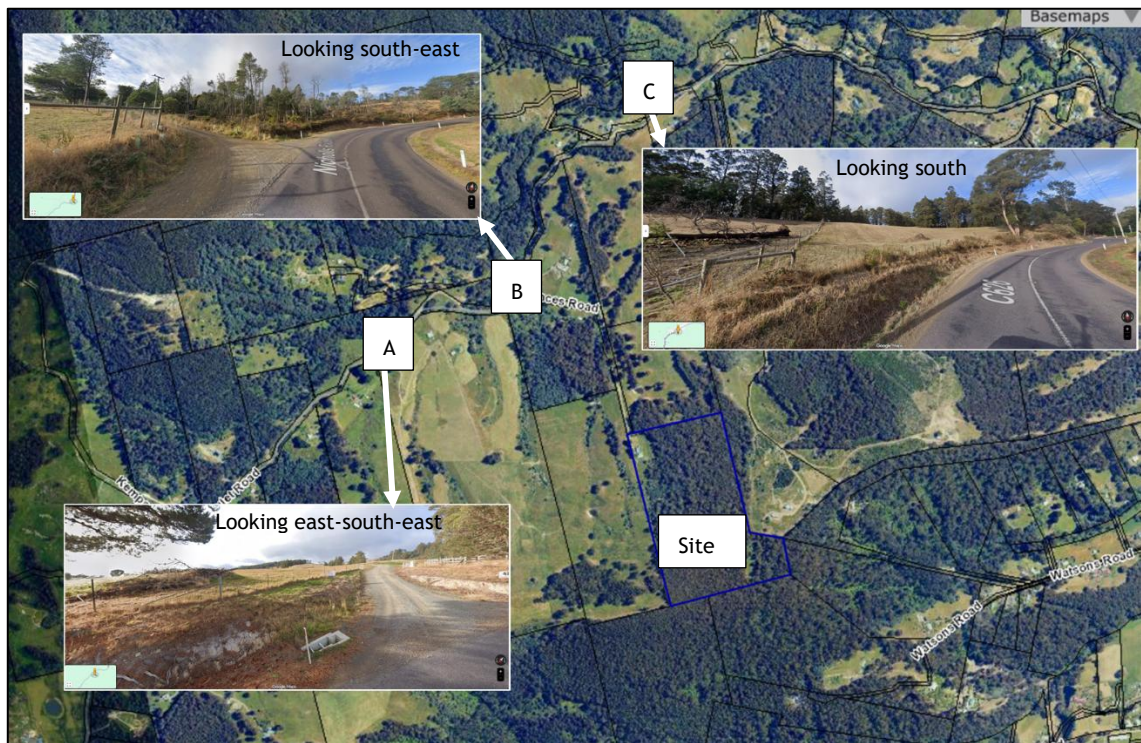


Figure 3 - View lines towards site from Nichols Rivulet Road (source: LISTmap accessed 16/04/2026 and Google Streetview accessed 16/04/2026)

The site therefore does not form a significant landscape element from any identified vantage point.

Native vegetation

The site is predominantly covered with native vegetation. The vegetation is proposed under the LPS to continue to be protected by Priority vegetation, Scenic landscape area and Waterway and coastal protection area overlays. The site is mostly *Eucalyptus obliqua* dry forest, with some patches of *Leptospermum scoparium* heathland and scrub, *Eucalyptus obliqua* forest with broad-leaf shrubs and *Eucalyptus obliqua* wet forest (Figure 4). The site also has small areas mapped as agricultural land and urban area (around the house). The historical aerial imagery show the site was largely cleared pasture during the 1960's' but has regrown since that time (Figure 5 & 6).

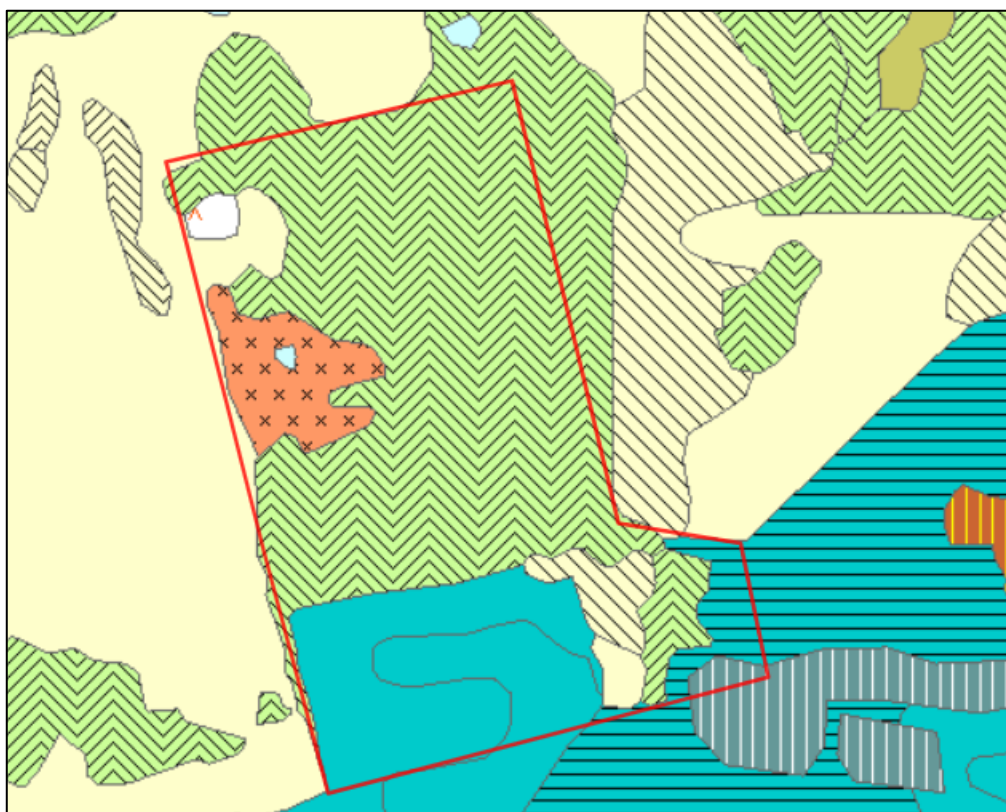


Figure 4 - TASVEG Live - green zig zag *Eucalyptus obliqua* dry forest, brown with crosses *Leptospermum scoparium* heathland and scrub, and aqua *Eucalyptus obliqua* forest with broad-leaf shrubs (source: LISTmap accessed 1/5/26).

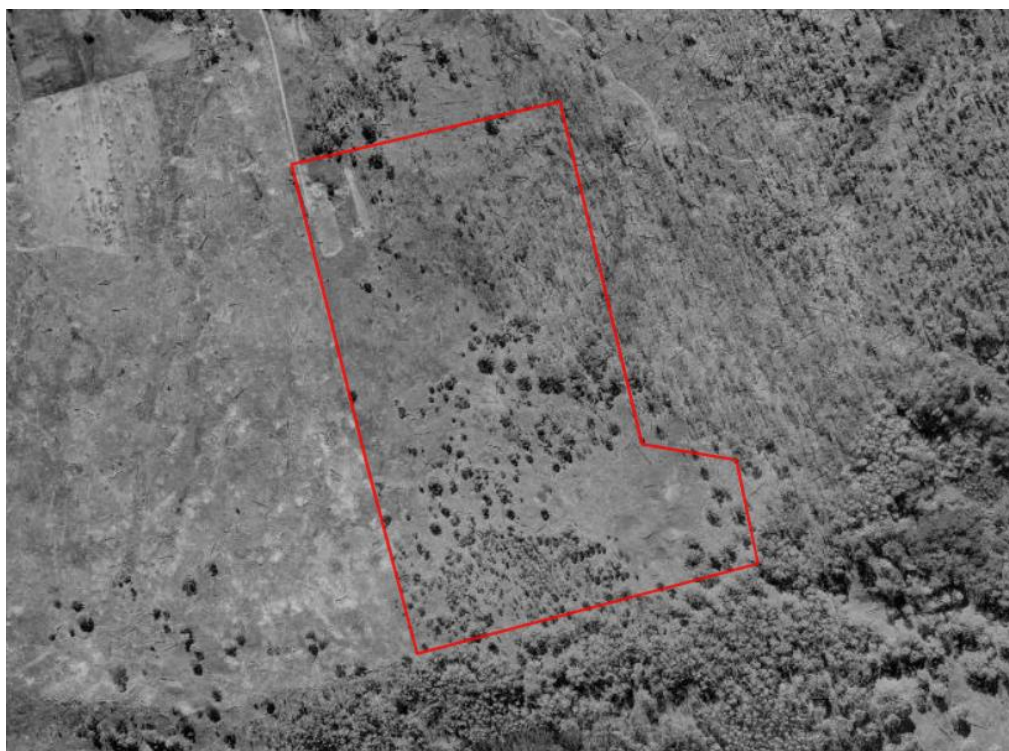


Figure 5 Aerial Imagery 1961-1970 (source: LISTmap - annotated accessed 1/5/26)



Figure 6 - Aerial photo 2025-2026 season (source: LISTmap -accessed 4/5/26)

The assessment above shows that while the site has natural values, these can change over a relatively short period of time and are not necessarily connected to the scenic values of an area.

Overall, the site does not accord with the landscape values identified in the locality baseline for 'Kettering West.'

Zone Evaluation (Ireneinc report section 3.6.2)

The Ireneinc report provides a 'decision point evaluation' for the area as a whole. This submission considers the decision points specifically for the subject site.

1. *Is there a strategic intention for any Residential use to occur?*

Yes. The site already contains a single dwelling.

2. *Does that area include state-reserved land?*

No.

3. *Are identified landscape values present?*

The presence of landscape values is indicated by the large area of native vegetation (bushland) on the site, and its existing inclusion within the Scenic Landscape Area overlay under the interim planning scheme. However, as detailed above, the site does not accord with the landscape values identified for the area. In particular, the orientation of the site and its location on the opposite side of the ridgeline relative to the coastline and its associated settlements preclude it from forming part of the "bushland backdrop to the lower coastline areas of the channel."

4. Does that area have characteristics of a rural living settlement?

The site does not form part of the area identified in the Ireneinc report as having rural living characteristics, and would not form a logical extension of the proposed application of the Rural Living Zone to nearby land adjoining Watsons Road to the south-east. As such, the remaining decision points 5-7 are not relevant, since they relate to land identified as having rural living settlement characteristics.

Ireneinc recommendations

Based on the evaluation framework, the Ireneinc report recommends alternate zones for some of the land. The following is noted:

- Some of the land is recommended to transition from ELZ to a Rural Zone, recognising land with existing residences on large blocks with significant bushland attributes, where the vegetation is captured within the Priority vegetation, Waterway and coastal protection and Scenic protection area overlays. The subject site accords with these characteristics and is therefore appropriate for inclusion in the recommended transition from ELZ to a Rural Zone. As noted in the Ireneinc report, *“this provides a zoning alignment which considered existing activities but continues to provide controls which can appropriately manage present landscape values.”*
- Although the site is recommended for transition from ELZ to LCZ, key rationales for this relate to the reinforcement of the *“bushland backdrop to the lower coastline areas of the channel”* and retention of ‘visually intact’ ridgeline features. As discussed above, the site does not form part of the bushland backdrop to the coastline areas; and although potentially visible from the alternative vantage point of Nichols Rivulet Road to the north, the ridgeline from this perspective is not consistently vegetated, with cleared land adjoining the site along the ridgeline to the east and west.

The more specific consideration of the subject site demonstrates that it is better aligned with the proposed application of the Rural Zone than with a transition the LCZ. The vegetation can be protected through the application of the Priority Vegetation overlay.

Consideration of Guideline No. 1 LPS zone and code application (s8A Guidelines)

Landscape Conservation Zone

The presence of large areas of native vegetation on the site along with its existing inclusion in the Environmental Living Zone align with the s8A Guidelines for the application of LCZ. However, as noted in the Ireneinc report, fragmented application of the LCZ is not appropriate. Although the site adjoins an extensive contiguous tract of land proposed to be within the LCZ, the connection is via only a small portion of the southern boundary and the remainder of the land within that zone is located south of the ridgeline, while the site is on the northern side of the ridgeline (Figure 7).

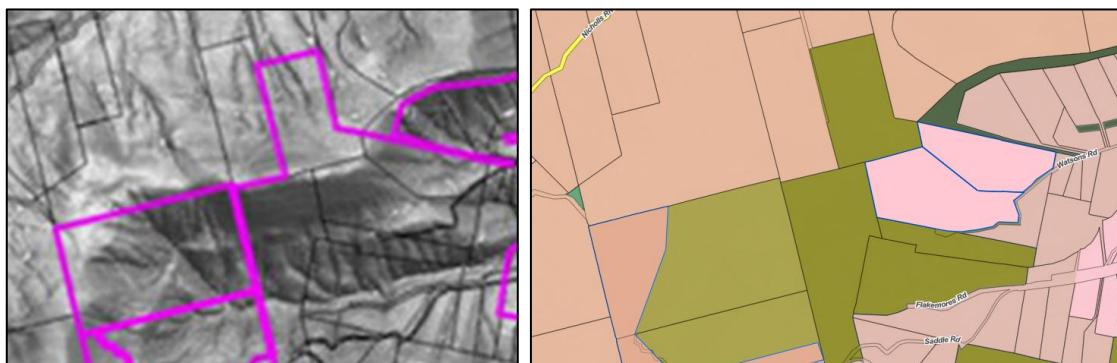


Figure 7 - Hillshade mapping (left) and proposed zoning (right) (source: screen capture of hillshade mapping from Ireneinc report; Proposed LCZ review undertaken by Irene Inc accessed 4/05/2026)

The application of the LCZ to the site would therefore be topographically anomalous. It would also form a barrier to any potential realignment of the boundaries, for example to facilitate an improved curtilage around the existing dwelling located at the north-west end of the site, or better utilise the limited agricultural potential of the land, as detailed in the following section.

Rural Zone

The zone application guidelines provide that the Rural Zone should be applied to rural land with limited or no potential for agriculture, and which is not more appropriately included within the LCZ or Environmental Management Zone (EMZ).

The s8A Guidelines state that the EMZ should be applied to land with significant ecological, scientific, cultural or scenic values. Although the site is predominantly vegetated, the *Eucalyptus obliqua* dry forest covering much of the site is not mapped as endangered. There are no geoconservation areas on the site and a search of the Aboriginal Heritage Tasmania database did not identify any registered Aboriginal relics or apparent risk of impacting registered Aboriginal relics. As such, the land is not more appropriately included in the EMZ.

It is considered that the LCZ is not a more appropriate zone as detailed above.

The land has limited agricultural potential owing to steep topography in addition to the protected vegetation and the dwelling on the site, which is reflected in its predominant class 6 land capability categorisation as 'land marginally suited to grazing due to severe limitations' (Figure 4). Like the surrounding land, the site's agricultural capacity is limited and does not warrant higher order agricultural zoning. However, an area of around 2,200m² in the north-west corner of the site is categorised as Class 5. As the landowner also owns and farms the adjoining land to the north, there is scope for extension of limited agricultural use within the cleared area of the land. In the event of future realignment of boundaries to enable better utilisation of the contiguous pasture, consistent zoning with the adjoining properties to the west and north, as well as the east, would better facilitate any boundary adjustment application to afford the most efficient use of the land.

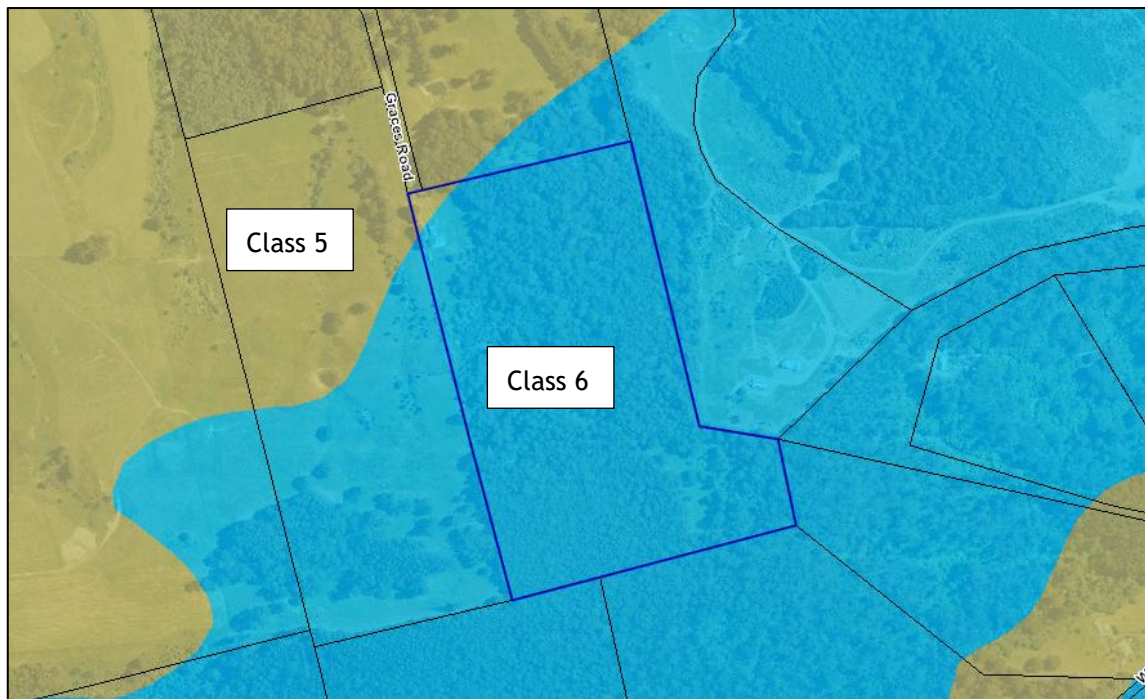


Figure 4 - Land capability categorisation (source: LISTmap accessed 16/04/2026)

As the land has little potential for agriculture other than the intended use for limited grazing, and is not more appropriately included within the LCZ or EMZ, the Rural Zone is appropriate for the site when considered in isolation.

The Rural Zone is also most appropriate contextually, given the proposed application of the Rural Zone to the adjoining land to the west, north and east, on the same side of the ridgeline as the subject site.

Conclusion

The recommendations in the Ireneinc report are based on a broad evaluation of the area. The more specific consideration of the subject site provided in this assessment supports its inclusion in the Rural Zone rather than the Landscape Conservation Zone. This is consistent with the rationale for the application of these zones as explicated in the Ireneinc report, and in alignment with the s8A Guidelines.

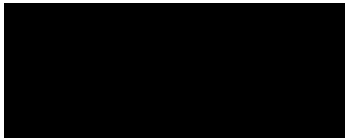
Application of the Rural Zone would also facilitate the landowner's intention to manage the agricultural capacity of the land in a coordinated manner with the surrounding properties to allow full utilisation of the land's potential. The Priority vegetation, Scenic landscape area and Waterway and coastal protection area overlays will continue to protect the natural values on the site.

In summary, the Rural Zone is the most appropriate zoning for the land.

If you require any further information or would like to discuss this response, please contact us at planning@mcplanners.com.au or 6288 7248.

Yours faithfully

MC PLANNERS PTY LTD



Angela Dionysopoulos

SENIOR PLANNER