
From: Marie Phillips [REDACTED]
Sent: Monday, 4 May 2026 9:34 PM
To: Kingborough LPS
Cc: Mark Phillips
Subject: Submission — Kingborough LPS Direction 69 — [REDACTED], Margate
Attachments: Marie and Mark Phillips [REDACTED] Margate - Contest_LCZ_Seek_RLZ.pdf

You don't often get email from [REDACTED]. [Learn why this is important](#)

Dear Commissioner

Please find attached our submission in relation to Kingborough LPS Direction 69 for [REDACTED], Margate

Title: 40595/3

Thank you for this opportunity for input.

Kind regards,

Mark Phillips

[REDACTED]

Marie Phillips

[REDACTED]

TASMANIAN PLANNING COMMISSION

*Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report***TEMPLATE T1****Contesting LCZ Retention
Seeking Rural Living Zone****We received:**

Letter 3 — Representor, not yet heard, LCZ retained

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 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.

I take up that opportunity and submit as follows.

PART B — PROPERTY DETAILS

Landowner name(s)	Mark and Marie Phillips
Property address	██████████
Title reference (folio)	40595/3
Lot size (approx.)	5.49 hectares
Locality	Margate Electrona
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) — C

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) 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

The predominant lot size in the Petterd Road and Hickman's Road area of Margate is approximately 5 ha, consistent with RLZ C. There are some properties in the adjacent area which are less than 5 ha which will be seeking Rural Living Zone B

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.

We purchased the property in 1989 when the land was zoned Rural Residential and started building a home in 1991. The house was completed in late 1999 and a workshop (craft studio) was added a few years later.

Since early 2000 it has been continuously occupied as a residence

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, not on the basis of demonstrated landscape values specific to my title.

There is a cleared area of established gardens around the residence of approximately 1 acre with the remaining area protected by the current and proposed code overlays.

Current Code Overlays (KIPS2015):

[E1.0 Bushfire-Prone Areas Code](#)

[E3.0 Landslide Code](#)

[E9.0 Attenuation Code](#)

[E10.0 Biodiversity Code](#)

[E11.0 Waterway and Coastal Protection Code](#)

[E14.0 Scenic Landscapes Code](#)No change

Proposed Code Overlays (LPS):

[C7.0 Waterway and Coastal Protection Area](#)

[C7.0 Priority Vegetation](#)

[C8.0 Scenic Protection Area](#)

[C12.0 Flood-Prone Areas](#)

[C13.0 Bushfire-Prone Areas](#)

[C15.0 Landslip Hazard](#)

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.

Our property is 5.49ha This is consistent with the RLZ C minimum lot size of 5 ha. and does not provide for further subdivision under that subcategory.

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

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.

My property contains an established dwelling, associated outbuildings including craft studio and garden/cleared areas with fencing.

Aerial photography over a period of 26 years confirms the consistently residential character of the property.



Fig 1 — [REDACTED], Margate - arial photo from ListMap

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

The Ireneinc framework identifies rural living settlement characteristics as: 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 etc.). The Ireneinc report's own locality baseline confirms that the broader settlement in which my property sits displays these characteristics.

Our property is situated within a cluster of properties along which is accessed from [REDACTED] but is adjacent to [REDACTED] and [REDACTED], each with lot sizes ranging from approximately 2 ha to 5 ha. The settlement pattern is consistent and has been established from around 2000 onwards. Neighbouring properties contain detached dwellings with associated outbuildings and rural activities.



Fig 2 – [REDACTED] - ListMap aerial photo showing surrounding settlement pattern

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].

As shown in D1.2 our property is within a Scenic Protection Area (SPA). It is subject to the PVA overlay but not a NAC overlay

These overlay controls provide adequate management of any landscape values present, without the need for the more restrictive LCZ.

The property is predominantly developed with native vegetation protected through codes.

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 our 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.

Subdivision of my property under this subcategory would not be possible, 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 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 LCZ areas in Margate and Electrona as medium-high risk. We submit that this rating does not accurately reflect the characteristics of our individual property for the following reasons:

- Development has already occurred in line with Development Guidelines
- Codes on our land protect landscape values

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.

D3.4 — Analogy 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 our property.

Our property in Margate Electrona is directly comparable to properties in Howden and a number of the areas listed above where RLZ was recommended. These areas share the following characteristics: lot sizes, settlement pattern, proximity to existing RLZ (particularly to the East of our specific property). There is no basis on which to treat our 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.

Our property is in close proximity to the east by properties zoned RLZ under the draft LPS.

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 RLZ, the application of LCZ to my property is inconsistent and not supported by evidence of any material difference.

The properties to our East and North East (see arial ListMap views) and shares the similar lot sizes, settlement character, and land cover, has been recommended for RLZ. There is no identified difference in landscape values, vegetation cover, or development history that would justify the different treatment of our property.

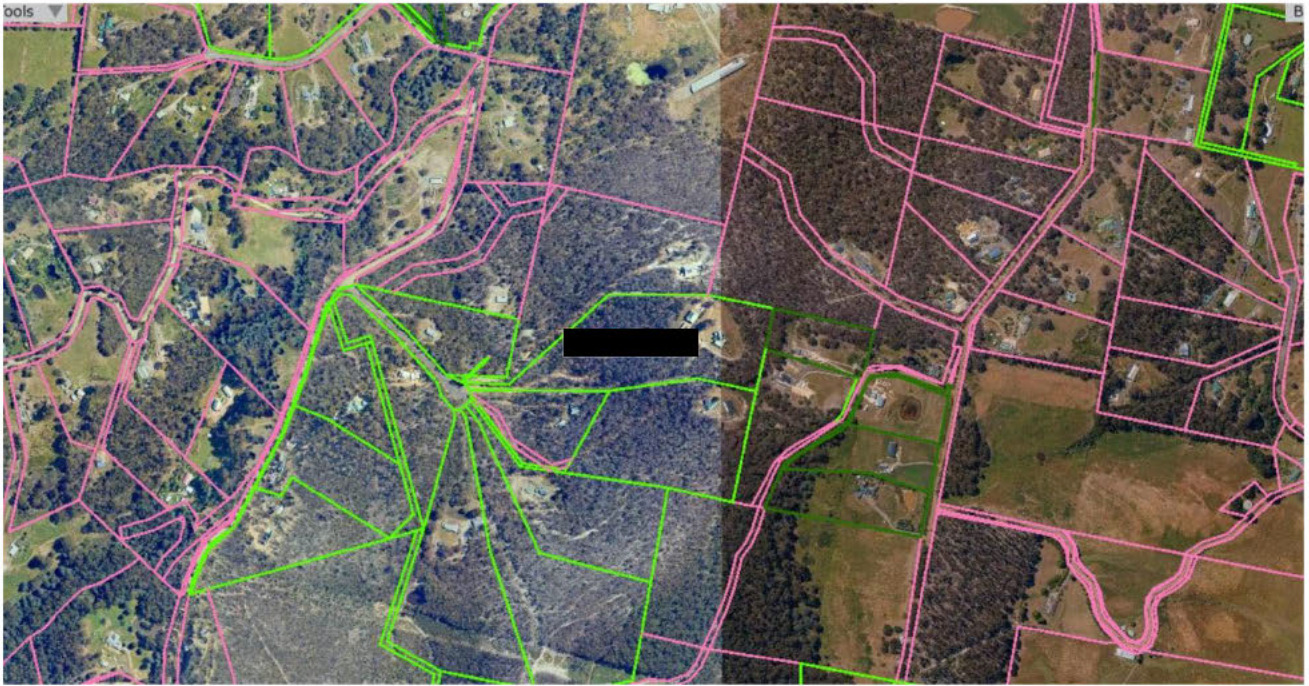


Fig 3 ListMap accurate boundaries – [redacted], [redacted] and [redacted] localities



Fig 4 ListMap zoomed in area with accurate boundaries – [redacted], [redacted] and [redacted] localities

Adjoining properties to [REDACTED] include:

- These properties all contain similar characteristics forming part of an established rural residential settlement pattern, not an intact natural landscape in which:

- Properties in [REDACTED] also have similar rural residential settlement pattern, noting that this was the original intent of the subdivision when it was first established.

D5 — Council's approach has been historically inconsistent

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, the LCZ recommendation should not be allowed to stand.

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 rather than LCZ for my property.

Our property is within the SPA and PVA overlay – see section D1.2 for all current and proposed codes.

These controls preserve tree-lines, native flora and habitat.

The combined effect of RLZ 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 in the Margate Electrona (Van Morey Road) section which was recommended by Ireneinc for retention of LCZ, Ireneinc also applied near-identical landscape value descriptions and settlement findings to both Howden/Blackmans Bay and Margate Electrona (RLZ cluster) localities. There is no significant or substantiated difference between these areas and Petterd Road and adjoining blocks in Longmans Road and the area assigned to RLZ for Howden/Blackmans Bay.

I request that the Commission have regard to Attachment A in assessing this submission, and in particular to the specific comparison rows identified, which demonstrate that the Ireneinc recommendation for this locality is 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 Margate and Electrona, Channel Region

Ireneinc recommendation for this locality - The Ireneinc report recommends LCZ for the majority of the locality, with some Rural Zone (Blue areas — rural activities); RLZ (Red - residential cluster); LCZ (Van Morey Road elevated/vegetated); EMZ (environmental reserve)

Existing zoning context for locality

For cleared/rural-activity parcels recommended for LCZ: we have previously indicated that Ireneinc's own framework placed similar parcels into Rural Living Zone in this locality

- As the area in [REDACTED] and [REDACTED] would be deemed to be of a residential-cluster, our lot shares characteristics with the RLZ cluster but was placed in LCZ. We seek consistency with the red RLZ group
- Our lot is closer in proximity and character to the residential-cluster shown to the east of our block than to [REDACTED] which has much more vegetated LCZ parcels.
- Our land is protected by a number of overlays so the values are retained and the further subdivision is not possible.

- Many representations from our specific area and Margate in general have been made opposing the LCZ allocation, indicating unreasonable impact and broad community opposition.
- The LCZ is intended to protect areas of genuine, high environmental or landscape value. That threshold is not met in this locality.

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.

I respectfully request that the Commission:

- Determine that the draft Kingborough LPS should be modified to include my property within the Rural Living Zone C;
- 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 40595/3 at [REDACTED], Margate, be included within the Rural Living Zone C in the Kingborough Local Provisions Schedule.'

Signed: Full name: Mark Anthony Phillips Marie Jean Phillips	Date: 3 May 2026 Contact email / phone: [REDACTED] [REDACTED]
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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	Mark Phillips and Marie Phillips — [REDACTED]
Property title reference	40595/3
Locality	Margate Electrona
Submission template used	Template T1 — Contest LCZ, seek RLZ
Date of attachment preparation	2 May 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	Similar locality cited in Attachment A	Why this comparison supports my submission	
Landscape value description	Howden & Blackmans Bay	Both described as elevated bushland with vegetated ridgeline; These ridgelines are visible from our lot	Howden received RLZ Our locality received LCZ — no clear reason for the difference
Landscape value description	Margate & Electrona (RLZ cluster)	Described as 'landscape values consistent with that anticipated in a rural living settlement; contributing to overall scenic character' — landscape values PRESENT but found manageable	Margate & Electrona (RLZ cluster) received RLZ Our locality received LCZ — no clear reason for the difference
Settlement characteristics found		Recognisable rural residential subdivision pattern; lots 2–7 ha; residential uses and rural activities	Lot sizes in our street and those lots to the east of us (facing the channel) and in near proximity to our property in Longmans Road and Hickmans Road are similar sizes and settlement characteristics (see arial photos in Letter)
Lot sizes		2–7 ha — consistent with RLZ C, however we were zoned LCZ	Petterd Road on Eastern lots are more characteristic of RLZ in settlement pattern, and immediately adjacent to other RLZ properties
Differentiator cited by Ireneinc		Settlement pattern consistent with rural living; existing blocks already fully used	In our street and also those adjoining our property have residences on them

Howden and Blackmans Bay – Ireneinc recommended changing from LCZ to RLZ, yet similar landscape values and settlement characteristics, lot sizes.

The Margate & Electrona RLZ cluster in the same locality as our property was recommended for Rural Living Zone because codes manage landscape values and the settlement pattern is consistent with rural living.

The within-locality RLZ is the directly relevant precedent.

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. Our lot is 5.49 ha — consistent with the 1–5 ha range accepted for RLZ at Howden, and within the range for which Ireneinc found codes manage landscape values adequately.
2. On this lot, the area which is not a gully is cleared with an existing dwelling and craft studio, and similar to the adjacent lots to the east of our property - see arial photos in our Letter.
3. Priority Vegetation Area overlay applies to our lot — consistent with Kettering West Groombridges 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 Baselineing 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. We are the owners of the property identified in Part 1 above.

Signed:

Full name:
Mark Anthony Phillips
Marie Jean Phillips

Date: 3 May 2026

Contact email / phone:
[REDACTED]
[REDACTED]