

From: Jacqueline Reardon <[REDACTED]>
Sent: Monday, 4 May 2026 2:56 PM
To: Kingborough LPS
Cc: Christopher Reardon
Subject: SUBMISSION - Kingborough LPS Direction 69 - [REDACTED], Tinderbox
Attachments: PART A -TPC Submission.docx; PART A -TPC Submission.docx

Importance: High

Good afternoon.

Please find our submission attached.

Kind regards,

Jacqueline Reardon
Finance Officer

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Calvary acknowledges the Traditional Custodians and Owners of the lands on which all our services operate, commits to Closing the Gap and to the ongoing journey of Reconciliation.

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Calvary celebrates 140 years of the Sisters of the Little Company of Mary in Australia

ATTACHMENT A

Inconsistency Analysis — Ireneinc Zone Evaluation

PART 1 — SUBMISSION IDENTIFICATION

Submission reference	Jacqueline and Christopher Reardon
Property title reference	██████
Locality	Tinderbox East
Submission template used	Template T1 – Contest LCZ. Seek RLZ
Date of attachment preparation	26/4/2026

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 favorable — 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 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 based on 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	Tinderbox East -LCZ retained	Tinderbox West - Full RLZ
Ireneinc Landscape Value description	Tinderbox East – Elevated bushland, vegetated ridgeline, dwellings nestled into vegetation, scenic backdrop, residential settlement pattern closely follows natural topography – identical language to west side. East received LCZ -no clear reason for the difference	Tinderbox West-Identical landscape value range – same peninsula, same vegetation type, same topographic character, coastal setting
Lot sizes	1-10 ha (with 2 large northeastern Lots noted as outliers)	1-10 ha

Settlement characteristics found	Yes- residential settlement along Tinderbox Road, lots 1-10 ha, dwellings with outbuildings, recognisable pattern	Identical – same road, same peninsula, same settlement type
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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:

In summary, the medium risk rating applied to the Tinderbox East locality is acknowledged to be a judgement-based assessment rather than one founded on defined thresholds. In the case of Lot 1, 296 Tinderbox Road, the planning outcome for the land has already been determined through an approved development application, a registered Part 5 Agreement on bush section of our land, and the operation of the Natural Assets (Priority Vegetation) overlay, all of which manage siting, vegetation retention and future development potential.

The existing pattern of development in the locality is one of dispersed detached dwellings on large rural-residential lots, a pattern appropriately recognized by RLZ A. The landscape values identified for the locality are capable of being protected through existing overlays and development controls without reliance on the Landscape Conservation Zone.

Consistent with matters raised by the Commission during Day 1 of the hearing regarding the purpose of the LCZ and the role of overlays in managing environmental outcomes, application of RLZ A would align zoning with the established and approved use of the land while maintaining protection of identified landscape values.

Accordingly, RLZ A represents the zone that most accurately reflects both the current character and the intended long-term planning outcome for the site.

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)

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. I am the owner or authorised representative of the property identified in Part 1 above.

Date: 30/04/26

Signed:



CHRISTOPHER REARDON
Full name:

Date: 30.4.2026



Contact email / phone: 

Date 30/4/26

Signed:



Jacqueline Reardon

Full name:

Date: 30/4/26



Contact email / phone: