

**From:** Clarence General Mail User  
**Sent:** Tue, 25 Feb 2020 11:14:46 +1000  
**To:** City Planning  
**Subject:** FW: Clarence Draft Local Provisions  
**Attachments:** Ridge submission final.docx

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**From:** John Cleary <tjcleary@iinet.net.au>  
**Sent:** Tuesday, 25 February 2020 11:53 AM  
**To:** Clarence General Mail User <clarence@ccc.tas.gov.au>  
**Cc:** Rachel Sammut <rachelsammut@hotmail.com>; Gerry Kregor <GKREGOR@yahoo.com>; Alison.Dunn@utas.edu.au; Chris Johnston <csjcj@bigpond.net.au>; pennylane.tas@gmail.com; Midge Jones <mcjones0@gmail.com>; Greg Young <Greg@opticit.co>; hollie.blackley@hotmail.com  
**Subject:** Clarence Draft Local Provisions

Clarence City Council General Manager

Dear Sir,

Please find attached a submission from property owners between Gordons Hill Road and Flagstaff Gully Road.

John Cleary  
[tjcleary@iinet.net.au](mailto:tjcleary@iinet.net.au)  
 Ph 0417033504

General Manager  
Clarence City Council  
PO Box 96  
Rosny Park 7018

25<sup>th</sup> February 2020

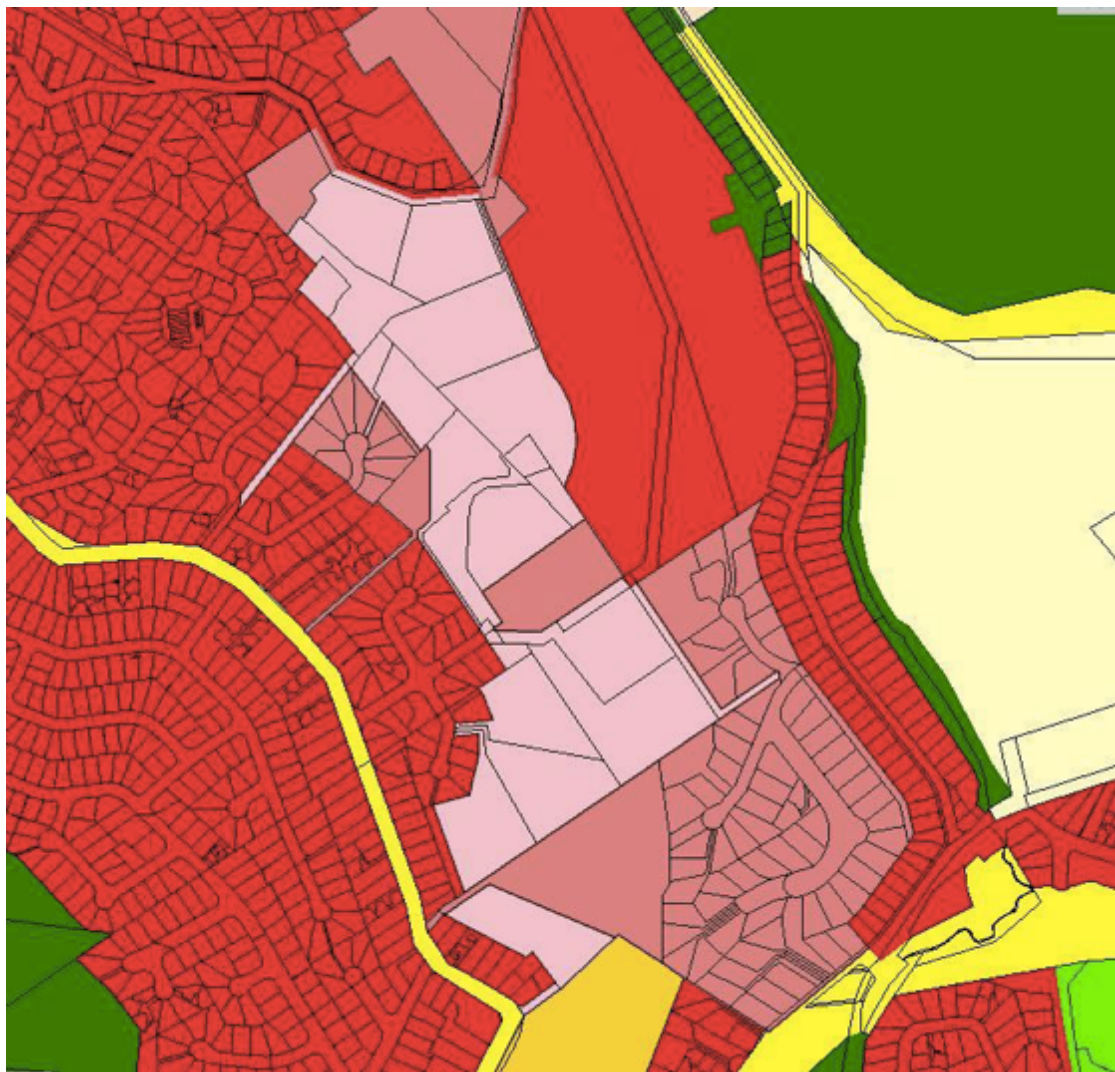
Dear Sir,

**RE: Tasmanian State Planning Scheme      Clarence Draft Local Provisions Schedule.**

We, the owners of land between Gordons Hill Road, Flagstaff Gully Road, Radiata Drive and Begonia St. request the Clarence Council to change the zoning of the Lindisfarne Ridge from Rural Living B to Low Density Residential.

Zoning and spatial context.

The subject land is shown below within the Rural Living Zone, with one property zoned low density residential under the interim scheme.



**Overview of the land zoned Rural Living surrounded by higher densities.**

Wide

This zoning would appear prima facie to be a direct translation from the Rural Residential zoning under the Clarence Planning Scheme 2007.

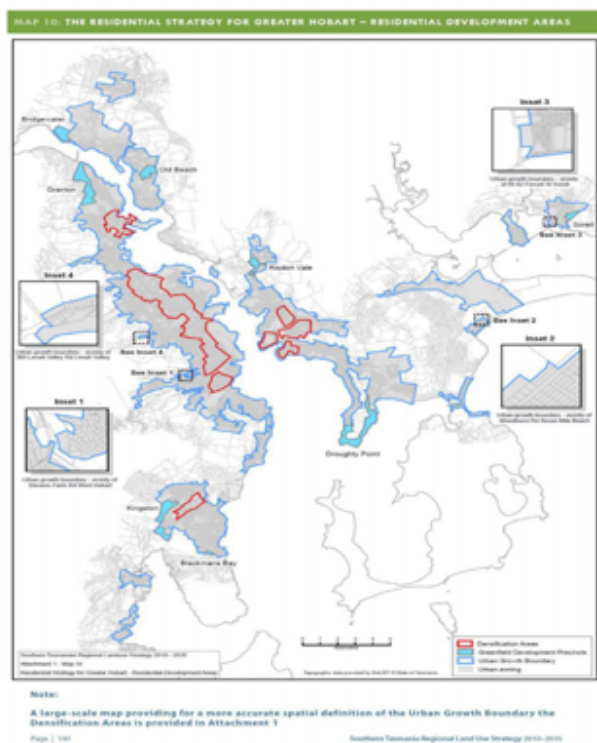
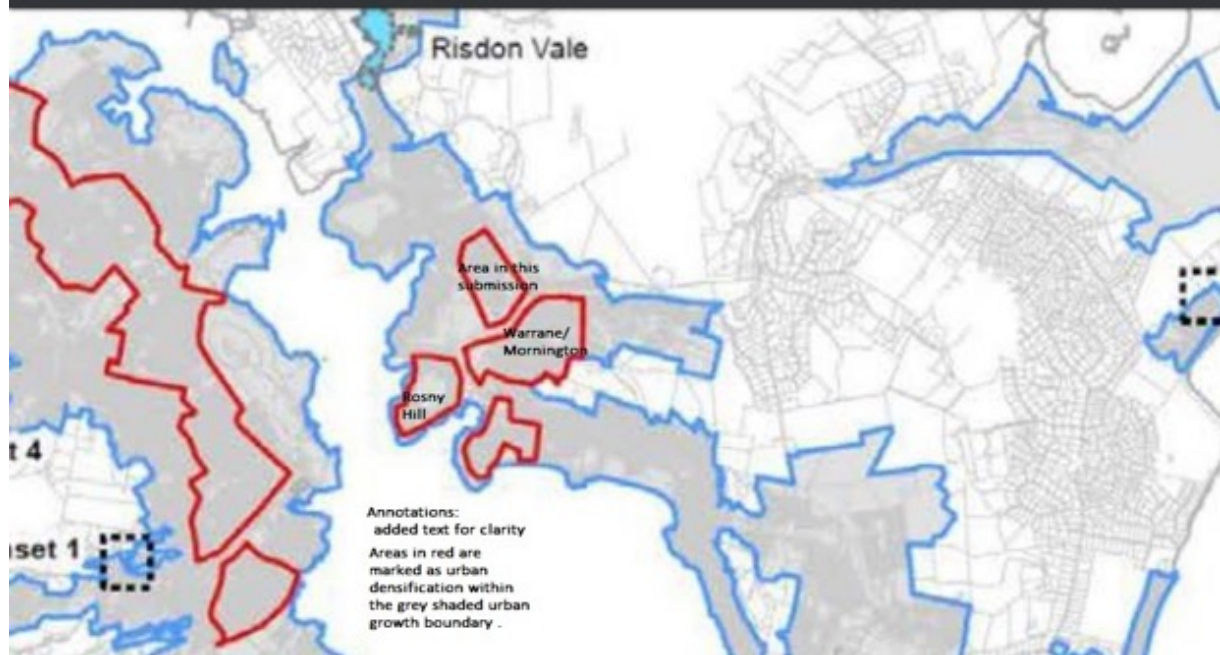
***The Land consists of a number of titles, including the following whose owners are signatories to this letter:***

<b><i>CT 154306/1</i></b>	<b><i>1.186ha</i></b>	<b><i>TJ &amp; VM Cleary</i></b>
<b><i>CT 157324/2</i></b>	<b><i>1.670ha</i></b>	<b><i>TJ &amp; VM Cleary</i></b>
<b><i>CT157324/1</i></b>	<b><i>927sq m.</i></b>	<b><i>G. Young</i></b>
<b><i>CT132742/1</i></b>	<b><i>1.055ha</i></b>	<b><i>H. Blackley</i></b>
<b><i>CT132742/1</i></b>	<b><i>1.112ha</i></b>	<b><i>R &amp; S Sammut</i></b>
<b><i>CT137391/12</i></b>	<b><i>1.00 ha</i></b>	<b><i>G. Kregor &amp; A. Dunn</i></b>
<b><i>CT157391/12</i></b>	<b><i>1.10ha</i></b>	<b><i>MC Jones</i></b>
<b><i>CT53545/6</i></b>	<b><i>1.20ha</i></b>	<b><i>C &amp; S Johnston</i></b>
<b><i>CT157338/3</i></b>	<b><i>1.5ha</i></b>	<b><i>MC Jones</i></b>
<b><i>CT4259</i></b>	<b><i>2.01ha</i></b>	<b><i>GB Lane</i></b>
<b><i>CT 2503</i></b>	<b><i>0.2ha</i></b>	<b><i>E Cowley</i></b>
<b><i>CT157338/1</i></b>	<b><i>1.0ha</i></b>	<b><i>Estate of PA Jones</i></b>
<b><i>CT157338/4</i></b>	<b><i>1.0ha</i></b>	<b><i>Estate of PA Jones</i></b>

For a long time, the Council has been discussing the need to infill existing service areas, thus reducing the costs to Council in providing and extending infrastructure.

The earliest report we have was prepared by Council in 1988 titled "Flagstaff Gully Local Area Plan" which identified the area for future residential development. Since that time there have been a number of ad hoc and somewhat idiosyncratic re-zonings in the area leaving a mosaic of zones none of which appear to comply with the existing definitions.

The subject land is well and truly within the Urban Growth Boundary under the Tasmanian Regional Land Use Strategy 2018 ('STRLUS') and is designated as an area for urban densification (*see following page*)



One of the primary thrusts of the STRLUS is to increase the density of fully serviced land in close proximity to key activity areas. In the subject case the land is part of suburbia, has access to all services, is close to both the Lindisfarne Activity Area and the Rosny Park Principal Activity Centre, and is within easy commuting distance of the Hobart CBD, with relatively easy access to public transport linking with both Rosny Park and the CBD.

In a strategic planning sense therefore, this land ought not to remain underutilized. It is our understanding that the subject land has been under consideration by Council for conversion to higher density for some time. Council have clearly adopted an incremental approach to this conversion over the years as evidenced by the rezoning of Jove Court, Radiata Drive, 13 Kent St from Rural Residential to Low Density Residential; and the rezoning of 166 Begonia St and parts of 162A Flagstaff Gully Road from Low Density Residential to General Residential.

This approach has resulted in lots in the Rural Living Zone having sizes more consistent with higher density zones. The existing lots are all subminimal and this needs to be rectified to reflect what has already occurred.

Accordingly, the owners request that you consider altering its zoning to Low Density Residential.

### **Rural Living Zone.**

The purpose of the Rural Living Zone is stated as being:

- *To provide for residential use or development on large lots in a rural setting where services are limited.*
- *To provide for compatible use and development that does not adversely impact on residential amenity.*
- *To provide for agricultural uses that do not adversely impact on residential amenity.*
- *To facilitate passive recreational uses that enhance pedestrian, cycling and horse trail linkages.*
- *To avoid land use conflict with adjacent Rural Resource or Significant Agricultural zoned land by providing for adequate buffer areas.*

The subject land does not have limited services and is not within a rural setting. It has no agricultural potential, for a variety of practical reasons and has limited potential for passive recreational use other than through providing public open space and/or pedestrian linkages that could be facilitated through subdivision. The land is not adjacent to Rural Resource or Significant Agricultural zoned land and will not create any relevant conflicts, nor would its development for residential use adversely impact on surrounding residential amenity.

The subject land is therefore entirely inconsistent with the purpose of the Rural Living Zone. *(SEE attachment A for the historical evidence of this in some of the subject land)*

The concept of zoning land adjacent to urban development as Rural Living is flawed. The Rural Living Zone provides for a range of activities that are neither compatible with urban residential amenity, nor necessarily for any skyline or conservation values that might be sought to protect. The Rural Living Zone should be confined to non-urban areas, not fragmented pockets immediately adjacent to urban development.



STRLUS Regional Policy 1.3(b) (vi):

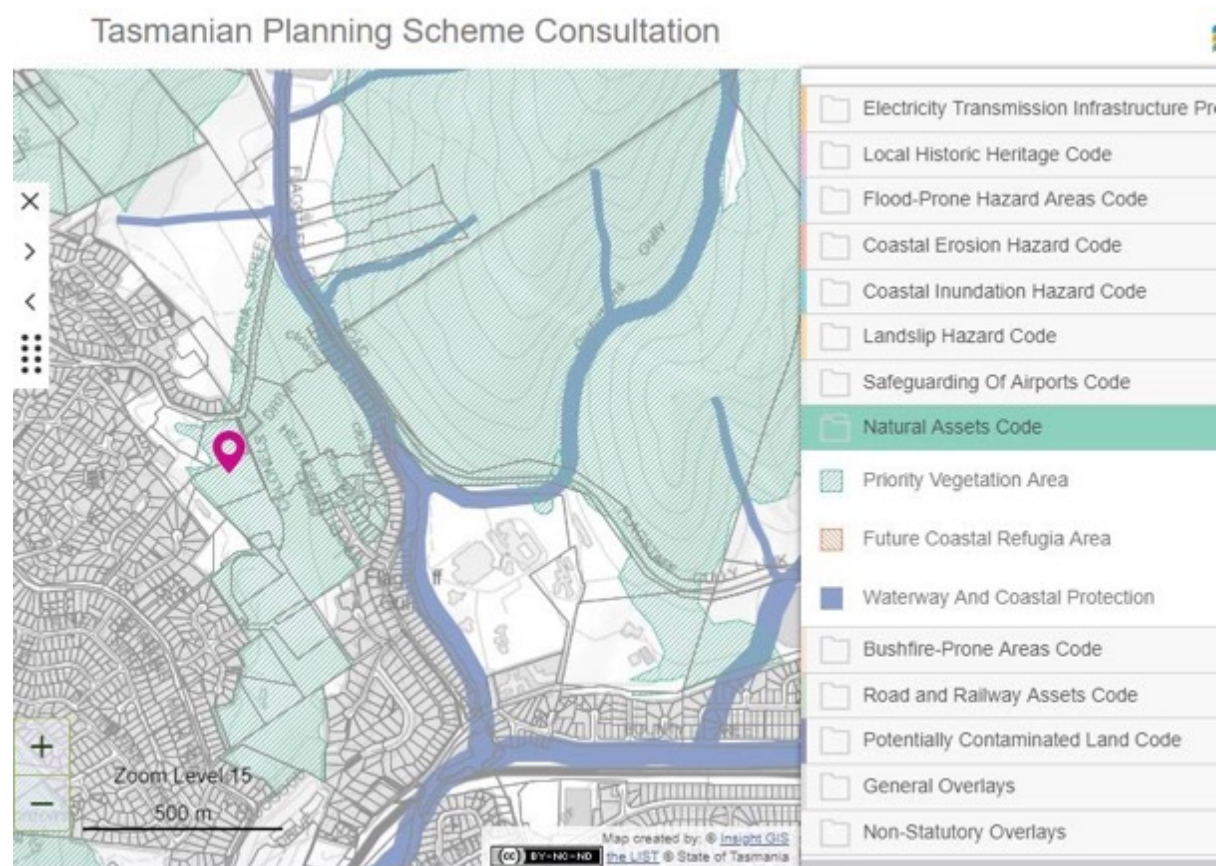
- *discourage the zoning of Rural Living adjacent to the Urban Growth Boundary or identified for future urban growth,*

whilst Regional Policy SRD 2.10 seeks to:

- *Investigate the redevelopment to higher densities potential of rural residential areas close to the main urban extent of Greater Hobart*

The subject land's purpose aligns with higher density (general residential) zoning but given the limited road infrastructure and the configuration of properties, re-zoning to low density residential is most appropriate.

### **Biodiversity Protection Area Overlay.**



This overlay covers areas of this land and the new scheme expands this area further.

It is not entirely clear whether the existence of this overlay has influenced the decision to zone the subject land Rural Living in order to minimise subdivision and development and therefore clearing of vegetation. If that is the rationale, then it is entirely contrary to the zone mapping guidelines provided in the STRLUS implementation report which states:

*“(The Rural Living Zone is) not to include land with significant tracts of native vegetation”.*

It can also be seen that the overlay has been misapplied to areas with no vegetation cover at all, including the eastern end of Kent St, including various service easements and rights-of-way. Dwellings, outbuildings and their curtilages are also covered by the overlay. Elsewhere the overlay has not been applied to land that has the same vegetation whether within the Rural Living Zone or some other zone. There is no consistency in the application of this overlay, and it should not be used (if it has in fact been) as the rationale for zoning the land Rural Living.

Additional information layers on the 'iplan' website describe the vegetation as being a Threatened Native Vegetation Community – Eucalyptus amygdalina forest and woodland on sandstone (TASVEG 3.0 'DAS'). Elsewhere in the 'TASVEG Live' it is described as 'DAM', ie E. amygdalina on mudstone rather than sandstone. The basis for the classification is shown as "sourced from photo" and "edge checked" by DPIWE in 2012. This apparent inconsistency is even more troubling because land adjacent and in the near vicinity containing the same vegetation is described as "extra-urban miscellaneous"

As evidenced in the aerial photo below, neither the Biodiversity Area overlay nor the TASVEG mapping appears to bear any consistency with the vegetation conditions on the ground. Even if they were accurate, Council has had little or no regard to them when zoning adjoining land to General Residential and Low Density Residential.



Assessments of the vegetation and plant communities in sections of the land were undertaken by North Barker in May 2014 in response to a request from Council for further information in respect to a proposed boundary adjustment. That report states:

*"The eucalypt woodland is dominated by white gum (Eucalyptus viminalis) with occasional black peppermint (E. amygdalina). A moderately dense understory includes black she oak (Allocasurina littoralis) native hop (Dodonaea viscosa) and black wattle (Acacia mearnsii). The ground layer is varied reflecting recent management and degrees of disturbance, supporting a mixture of native herbs and grasses locally dominated by sagg (Lomandra longifolia) but also including other non- native species. The condition of the vegetation is at*

*best moderate: the ridgeline has been modified by historic surface quarrying for sandstone. The age of the vegetation and structure of the older trees suggests that the land would have been previously cleared and possibly grazed with occasional paddock trees retained.” (ibid.p1)*

*The condition of many of the trees is poor especially along the ridgeline. There is evidence of dieback, with a number of dead trees.” (ibid)*

*“The size, relative isolation, and condition of the vegetation suggests that this area may not be the best suited for the conservation of these communities. The subject land is relatively small less than 3ha with the northern third significantly modified as it supports a house, garden and associated infrastructure” (ibid)*

*“long term benefits to be derived by retaining the land as bushland is dependent on the outcome of the longterm management of the larger lots to the west and north. In isolation this land does not provide a particularly significant contribution to conservation of Eucalyptus amygdalina forest on sandstone (ibid.p2)*

The property to the north (13 Kent St) has already been included in the Low Density Residential Zone. Land to the west includes dwellings and outbuildings with large cleared curtilages on lots around 1ha size. They are immediately adjacent to standard residential lots within the General Residential Zone. The Biodiversity Protection Area overlay is also inaccurately applied to the entirety of these low density lots.

Also attached are photographs of 1A Cedar St and 132 Begonia St, subject to the biodiversity protection overlay. In fact, no undisturbed original vegetation exists on these properties. The ground cover is mostly introduced species, rough garden, including introduced trees, with heavy domestic use and vehicular tracks. Radiata Pine trees are a serious weed across the area. The undergrowth has been cleared often for both fire hazard reduction and gardening. The current understory is mostly bracken fern, agapanthus, weeds, grasses and sags. Pine trees and boneseed are a continual problem requiring regular removal and maintenance. This area is well used for domestic, residential purposes and has been for many decades.



We would suggest that Council remove the biodiversity protection overlay from the area.



### **Skyline and Visual Amenity.**

It is possible that the Rural Living Zone has been applied to the subject land to protect the skyline from encroachment by buildings.

This would also be a misconception: the subject land is not “skyline”; it is a plateau hidden visually behind Gordons Hill and is even at certain times in the shadow of the hill; the land on the eastern and south eastern sides already contain existing residential development that breaks the skyline; any future development of the subject land will be screened by this development and by Gordons Hill.

This skyline and visual amenity, specifically dealing with 21 Kent St, but typical of the whole ridgeline in this submission, was discussed and found inapplicable by Council in 2015 (*ref. Agenda for Council meeting 13 July 2015 pp 42-69: “Buildings should be sited away from the skyline and prominent ridgelines to avoid being silhouetted against the sky when generally viewed from a public place”*

*“This site is relatively flat and located on top of a small hill, which is not considered a prominent ridgeline.”*)

### **Conclusion**

All these matters were raised at the last Tasmanian Planning Commission hearings to consider the Clarence Interim Planning Scheme 2015 held in May 2016.

As a result, we were advised by The Planning Commissioner Greg Alomes that he had met with then City Manager Andrew Paul and the Director of Planning Ross Lovell and that they had agreed to initiate a process to address what was determined at the hearings. Unfortunately, after numerous enquiries by several owners to both the Planning Commission and the Council, nothing has happened.

As determined at those hearings before the Tasmanian Planning Commission, there is no obvious credible rationale for the subject land to be zoned Rural Living B.

All the lots have sizes more consistent with higher density zones, they are all subminimal and the whole area needs to be rezoned to Low Density residential to reflect what has already occurred in individual cases.

We ask all members and staff of the Clarence Council to resolve this issue as a matter of urgency. In addition to consider the related matters listed in Attachment B.

Signatories

CT 154306/1  
CT 157324/2

1.186ha  
1.670ha

TJ & VM Cleary  
TJ & VM Cleary

20 Kent St, Lindisfarne  
email: [cleary@me.com](mailto:cleary@me.com)

*T.J. Cleary*  
*V.M. Cleary*

CT132742/1

1.112ha

R & S Sammut

19 Avoca St, Lindisfarne  
Email: [rachelsammut@hotmail.com](mailto:rachelsammut@hotmail.com)

*R Sammut*

CT137391/12

1.00 ha

G Kregor & A Dunn 17 Avoca St, Lindisfarne

Email: [gkregor@yahoo.com](mailto:gkregor@yahoo.com)  
[Alison.Dunn@utas.edu.au](mailto:Alison.Dunn@utas.edu.au)

*G Kregor*  
*A Dunn*

CT53545/6

1.20ha

C & S Johnston

13 Kent St, Lindisfarne  
Email: [csjcj@bigpond.net.au](mailto:csjcj@bigpond.net.au)

*C Johnston*  
*S Johnston*

CT4259

2.01ha

GB Lane

19 Kent St, Lindisfarne  
Email: [pennylane.tas@gmail.com](mailto:pennylane.tas@gmail.com)

*G B Lane*  
*E B Lane*

CT 2503

0.2ha

E Cowley

21 Kent St, Lindisfarne

*E Cowley*

CT157391/12

1.10ha

MC Jones

148 Begonia St, Lindisfarne

CT157338/3

1.5ha

MC Jones

CT157338/1

1.0ha

Estate of PA Jones

CT157338/4

1.0ha

Estate of PA Jones

*MC Jones*

Email: [mcjones@gmail.com](mailto:mcjones@gmail.com)

CT157324/1

927sq m.

G Young

16 Kent St

Email: [greq@opticit.co](mailto:greq@opticit.co)

*G Young*

CT 132742/1 1.055ha

H. Blackley

19A Avoca St  
Lindisfarne

email: [hollie.blackley@hotmail.com](mailto:hollie.blackley@hotmail.com)

*H Blackley*

## **Attachment A**

### **Clarence Draft Local Provisions Schedule 2020 Based on Representation to Tasmanian Planning Commission on May 2016. M.C. Jones, 148 Begonia St, Lindisfarne**

My presentation relates to that region of Lindisfarne within the Urban Growth Boundary, bounded by Begonia St., Flagstaff Gully Rd, Tasman Highway and Gordons Hill Road, that is zoned as *Rural Living B* under the *Clarence Draft Local Provisions Schedule*. Some of the things I have to say relate to all the properties in that area, but I shall concentrate on those properties in which I and my immediate family have an interest. These are 132, 140 and 148 Begonia St, and 1A Cedar St.

#### **Rural Living Zoning**

In the early 1970s the Sherwood Estate subdivision, including the upper side (odd numbers) of Begonia St had just been completed. An apple and pear orchard bordered it to the east. There was a semi-commercial egg farm at 132 Begonia St. The Katrina Court area was a paddock with cows and sheep. Cedar St and Kent St subdivisions both ended at about the 200 foot contour above sea level. There were 9 dwellings from Cedar St to Kent St above the water board's pipeline and several families in the general area kept horses. The Radiata Drive, Wassel Place and Jove Court area was farmland, most of it derelict. The area was semi-rural and quite on the edge of suburbia.

I spent my childhood on the properties 132, 140 and 148 Begonia St, and 1A Cedar St, and can remember the introduction of the restriction to one hectare minimum lot size zoning in the early 1970s. Our property and the others nearby did not have reticulated water supply, relying on private pumps from Cedar St and Kent St to storage tanks on each property. Sewerage, stormwater and Council garbage collection were not available to any of the properties. The only services were telecommunications and electricity, with mail deliveries only as far as the ends of Kent St and Cedar St.

I was too young then to understand the zoning processes, but I remember that my father, owner of 132 Begonia St, was disappointed that that restricted zoning was applied to his property, as his property did not appear to meet **any** of the criteria. The Hobart Water Board had just compulsorily acquired land to create the Risdon Brook Dam/Warrane pipeline and their land was designated as the downhill boundary of the one hectare lots when they were first zoned as such. The pipeline passes beneath and across this one hectare zoned area (now mostly zoned as *Rural Living*).

It is now nearly 50 years later. The upper Lindisfarne of 50 years ago from Cedar St to Kent St is long gone. All properties now have town water supplies available to their doors. All of 132, 140 and 148 Begonia St; 1A and 32 Cedar St; 30 Katrina Court; and 19 Kent St have direct access to all services and facilities. There has been no egg farm, or cow and sheep farming for more than 20 years. The last sheep was killed by a suburban pet dog. No one has horses or the capacity to keep them. Cedar St and Kent St have been further subdivided. Radiata Drive, Wassel Court, Jove Court, Katrina Court, Hillmorton Road are all developed.

162A Flagstaff Gully Rd is ready for housing. Correctly, the whole area has been placed within the Urban Development Boundary in the *Southern Tasmanian Regional Land Use Strategy 2010-2035*. Additionally the properties with Begonia Street and Kent Street addresses are within an area specifically designated for densification. (page 99 of *the Strategy*).

The large lot sizes here are clearly a hangover from the past. The “direct translation” from planning scheme to planning scheme over decades has gradually placed the zoning purposes and rationale of these properties well outside their proper environment, having concentrated largely on lot size, without paying close attention to the other philosophies and purposes of the allocated zonings. As time has gone by, so the purposes of the large lot zoning have altered to the extent that no property in the area of interest Begonia St, Flagstaff Gully Rd, Kent St, Gordons Hill Road complies with **any** of the attributes of the *Rural Living B* zoning. The largest anomaly in the like-for-like translations would have occurred in production of the *Clarence Planning Scheme 2007*, when the 1 hectare suddenly became 2 hectares and the rationale for larger lots was altered significantly.

Looking at 132, 140, 148 Begonia St and 1A Cedar St we can see that the land has access to all services and facilities and is not within a rural setting. Every one of these lots is considerably less than 2 hectares area. There is no agricultural potential, for a variety of practical reasons and the land is not available for public passive recreational use. The land is not adjacent to Rural Resource or Significant Agriculture zoned land and will not create any relevant conflicts, nor would its development to smaller lots for residential use adversely impact on surrounding residential amenity. In fact, further development would lessen neighbours' concerns about trees falling over their boundary fences, and bushfires. The land of these 4 properties is entirely inconsistent with the purpose and integrity of the *Rural Living Zoning*. It is a truly suburban area, in agreement with its inclusion within the Urban Development Boundary, and identification for densification.

The *Rural Living Zone* should be confined to non-urban areas, with no fragmented pockets immediately adjacent to, and surrounded by, urban development.

The *Southern Tasmanian Regional Land Use Strategy* SRD 1.3b(iv), and 1.3c(vi), discourage the zoning of land Rural Living adjacent to the Urban Growth Boundary or identified for future urban growth, whilst SRD 2.10 seeks to:

*“Investigate the redevelopment to higher densities potential of rural residential areas close to the main urban extent of Greater Hobart.”*

I have produced a map and table showing the actual sizes of some of the properties and their facilities available (submitted to the Tasmanian Planning Commission on 18 April 2016).

Whereas in 1970 the total dwellings in this area Cedar St to Kent St was ten in an area of 13 hectares, there are now more than 20 dwellings provided for in that area. The *Rural Living Zone* would allow for 6 dwellings in this area that now provides for more than 20, less than one third of the current allowance. This is highly significant.

IN 2015 Clarence Council approved a development application by the owners of 13, 19 and 21 Kent St for a housing development on one of the undeveloped sub-minimal sized *Rural*



*Residential* lots, of less than 2000 sq.m., now called 21 Kent St. This development proposal showed clearly that the applicants, the owners of those properties, do not support the philosophy, integrity or purposes of the *Rural Living Zone*. The approved development may have been consistent with *Low Density Residential* zoning. See for reference Agenda for Council meeting 13 July 2015 pages 42 to 69. Their deliberation certainly indicated that *Rural Living* was not a consideration. Excerpts are below.

*“The proposal fails to comply with the boundary setback requirements for the north-east, south-east and south-west side boundaries. Clause 6.3.3(g)(ii) of the Scheme states that a variation to the setback requirement may be granted where the existing lot is less than 2ha. As discussed, the subject site has a small area of 1958m<sup>2</sup> and is narrow in width.”*

*“Appropriate separation should be provided between buildings and boundaries to provide adequate visual separation.” -*

*“The proposed buildings would be located approximately 30m from the nearest buildings on the adjoining lots at 11 and 19 Kent Street. The proposed “studio” would be located approximately 15m from an outbuilding at 13 Kent Street; but approximately 70m from the dwelling. As discussed above, the area and shape of the subject lot mean that it would be almost impossible for the developer to meet the 10m setback requirements of the zone.”*

*“Buildings should be sited away from the skyline and prominent ridgelines to avoid being silhouetted against the sky when generally viewed from a public place.”*

*“The site is relatively flat and located on top of a small hill, which is not considered to be a prominent ridgeline.”*

*“The buildings would have a maximum height of 4.7m above natural ground level. The proposed dwelling would have a setback of 3.971m from the northeast side boundary, while the proposed studio would have a setback of 7.85m from the north-east side boundary. The dwelling, “studio” and carport would have setbacks of 4.825m, 4.56m and 2.2m from the southern side boundary respectively. The proposed studio would have a setback of 4.56m from the south-east side boundary.”*

Clearly, for many reasons, the *Rural Living* zoning between Begonia/Cedar St/Kent St is entirely incompatible with the *Southern Tasmanian Regional Land Use Strategy* and with the *Rural Living Zone* attributes. It is time this was corrected.

### **Natural values considerations - Biodiversity Protection Area Overlay on 132, 140 Begonia St and 1A Cedar St.**

In 2005 a vegetation assessment done as part of the subdivision/boundary adjustment SD 2005/55 described the vegetation on 132 and 140 Begonia St as being “modified over the years to reduce fire hazard with areas of open eucalypt forest (predominantly *Eu. Amydalina*) with a bracken and rush understorey and areas of exotic weeds and grasses”, i.e. devoid of significant ecology and significant natural values.

It would have been correct to remove the overlay from this area at the time of approval of that application; however, apparently the development was approved between the

preparation of the draft and final *Clarence Planning Scheme 2007* plans, and so inadvertently the change was not made. That omission can now be corrected.

### **Biodiversity Protection Area Overlay on 148 Begonia St**

As mentioned in my earlier submission to Council (August 2015, representor number 24), the existence of the Biodiversity Protection Area Overlay on 148 Begonia St is a remnant carry forward from earlier zonings and schemes. The overlay, I am told, was originally allocated indiscriminately from aerial survey, without ground truthing, and without regard to the suburban nature of the housing beneath. The presence of overlay on this property is inconsistent with overlay on adjacent properties and the area in general. Council staff had suggested I send photos as part of my earlier submission (August 2015) to demonstrate the state of the land at 148 Begonia St. The neighbouring property, 19 Kent St, with similar mix of native vegetation, introduced vegetation and housing, has no biodiversity overlay, confirming the indiscriminate nature of the biodiversity overlay – this can easily be seen from Google Earth and overlay maps

The summary of submissions and CCC recommendations on them, adopted by Council on 1 February 2016 notes with respect to 132, 140 and 148 Begonia St and 1A Cedar St that “In the event that the land is rezoned the removal of the Natural Assets Code ought to form part of that amendment.” (page ...)

Biodiversity Protection Area Overlay was removed from 166, 172 Begonia and 248 Flagstaff Gully Rd when these properties were rezoned several years ago, leaving an isolated remnant of unwarranted overlay in the 132, 140, 148 Begonia St area.

### **Bushfire Zone overlay.**

The danger from unconstrained wildfire is real in this area. The zoning of 166 Begonia St as Low Density Residential allows for easy removal of fire prone species, including *Pinus Radiata*, and so reduce general fire dangers in the area.

### **Summary**

The removal of the inappropriate *Rural Living Zone* from this area, and the inclusion of the properties from Begonia St to Kent St in either the *Low Density Residential Zone* or the *General Residential Zone*, with removal of biodiversity overlay, would strengthen the integrity of the Clarence Interim Management Plan 2015, and set a sound platform for Council's application of the Plan in the future.

## **Attachment B**

Related matters that need consideration under the Clarence  
Draft Local Provisions Schedule:

- Rezoning 16 Kent St from Rural Living B to General Residential to comply with its existing size and location
- Rezoning the land on the eastern boundary, known as Wiena Reserve, from Low Density residential to a suitable zoning for public reserve areas
- Rezoning Jove Court, Radiata Drive and Wassell Place from Low density residential to General residential to comply with the urban densification strategy of the area.