

R.A. & M.F. Ibbott

28 East Shelly Beach Road

Via Orford. TAS . 7190

(Postal Address) 13 Broadwaters Parade

Sandy Bay, TAS. 7005

[tonyibbott@gmail.com.au](mailto:tonyibbott@gmail.com.au)

Mobile: 0409 433 898

14 February, 2020

Chris Schroeder

General Manager

Glamorgan Spring Bay Council

P.O. Box 6, Triabunna, TAS, 7190

[planner@freycinet.tas.gov.au](mailto:planner@freycinet.tas.gov.au)

cc: [tpc@planning.tas.gov.au](mailto:tpc@planning.tas.gov.au)

**Re: Public Comment on the Statewide Planning Provisions (SPP)  
and the Local Provisions Schedule (LPS)**

**Representation**

The purpose of this representation is threefold, namely :-

- (1) To say just how difficult it is for 'jo blow' to understand the complexities of the planning system
- (2) To confirm some positives of the proposed system, and
- (3) To highlight some omissions and additions.

# **1 Tasmanian Planning Scheme**

## **State Planning Provisions**

- 1.1 We support in principle the development of a simplified single State planning scheme.
- 1.2 Notwithstanding that “one size does not fit all” so we support the concept of a well thought out Local Provisions Schedule.
- 1.3 We believe the Zones, Codes, and Specific Area Plans are NOT negotiable, and this may contravene principles of natural justice. We would urge the Tasmanian Planning Commission to review this.
- 1.4 Notwithstanding 1.3 above, we are generally satisfied with the Zoning categories, if not their application.
- 1.5 Likewise, the Codes appear to be satisfactory and there has been some very good work done by people such as Inspiring Place in the Background Report Version 4 December 2019 to inform the Codes.
- 1.6 We understand that the application of Zones and Codes is the role of GSBC under the Local Planning Scheme, and that Guidance as to how Zoning should be applied is contained in something called the Section 8A Guidelines, however we were not able to locate these?
- 1.7 As a general comment though, Orford and surrounds historically was developed with quality lot sizes and housing, whereas in recent years ‘development’ has been driven by quantity rather than quality. This is going to end up with, ‘slums by the sea” development unless this is turned around in the near future.
- 1.8 The East Coast is a place of Natural beauty and scenic value, however the built environment leaves a lot to be desired. We must improve the quality of the built environment.

## **2. Demand & Zoning**

2.1 The University of Tasmania Institute for the study of Social Change Insight Nine Report," Regional population trends in Tasmania: Issues and Options," identifies 15 of 29 Tasmanian Councils with ageing communities as declining in population between 2020 and 2042, including GSB with a decline of 6.5%, as well as Break O'Day, Flinders, and Tasman.

These will be characterised by Hyper-ageing, the natural decline being replaced by migration, and tourism.

The consequence of these trends is that demand will be by market segments Eg. Aged Units, Affordable housing, Tourist accommodation) based on consolidated infill development within walking/riding distance from town services (education, health, communication, groceries, etc).

2.2 The Southern Tasmanian Regional Land Use Strategy (STRLUS) identifies Orford as a township of low growth (less than 10%) where any growth should be through infill consolidation rather than by green fields development. Hence, the area listed as Future Urban Zone adjacent to Rheban Road in the State Planning Provisions does not meet the Zoning Guidelines and is inconsistent with State and Regional policies. The proposed Zoning classification for this area is both inappropriate and premature, and would be more appropriately Zoned as Low Density Residential in light of the infrastructure constraints ( low rainfall dry climate water supply, Sewage flooding during storm events at the East Shelly Beach sewage pumping station, lack of bike/walking tracks, need for habitat corridors, occasional flooding during storm events etc).

2.3 We understand that the Orford Golf Club owns land surplus to its requirements (as it can only ever cater for a 9 hole course) and that this land has been Zoned as Recreational (possibly without consultation). This land has the potential to be available for infill development in consultation with the Golf Club legal entity. This could be seen as another example of premature and/or inappropriate zoning?

### **3. Specific Area Plans**

3.1 In general we support the SAP's and while we understand that these have been inserted as approved and are not able to be commented on, there is a case for each of the SAP's to be implemented as approved or not all. For example, we understand the Solis development (Louisville Road Specific Area Plan) was approved as an integrated Golf Course, accommodation, and residential development. As such it must proceed as a whole or not at all. To do otherwise will be to ensure the Golf Course never happens.

### **4. Codes**

4.1 In general we support the State Planning Provision Codes being applied to the Local Provisions Schedule, with the addition of the following comments.

#### **4.2 Local Historic Heritage Code (C6-0)**

Add to the Register "The Graveyard at Rheban on the southern side of Emerald Bay."

Restore the Railway cutting from the Quarries at Luther Point which was filled in by Council some 10-20 years ago. The cutting needs restoration and historic information provided for tourist traffic.

### **4.3 Natural Assets Code (C7.0)**

This Code is vital to the maintenance of Remnant Vegetation and Habitat for threatened and other species and the maintenance of wildlife corridors.

Species identified during the current summer holidays at East shelly Beach include: a sea eagle, a wedge tail eagle, an echidna, an eastern barred bandicoot, a blue tongued lizard, and numerous other bird species.

### **4.4 Scenic Protection Code (C8.0)**

Add to the Register, “Spring Beach,” which is a beautiful white beach with crystal clear green/blue water looking out on Maria Island and book-ended by the cliffs at both ends. It is highly valued and much painted and photographed.

The Scenic Protection Code needs to be applied and compliance ensured to front fences along scenic corridors including The Tasman Highway and Rheban Road to Spring Beach.

### **4.5 Coastal Erosion Hazard Code (C10.0)**

We note the identification of Raspin’s and Millington’s Beaches as areas of coastal erosion, however there appears to be no plan to re-route the Tasman Highway, for example, via the old Alma Road to the Tasman Highway prior to Barton Avenue?

Evidence from other places shows building walls only makes the beach erode faster so that is not a good option.

#### **4.6 Coastal Inundation Hazard Code (C11.0)**

Develop Strategies and Policies for 'getting ahead ' of impacts of sea level rise, storm events, and further inundation of unstable sand foreshores and allow no further development on such foreshores.

#### **4.7 Front Fences (SPP Table 4.6)**

Ensure design and building compliance of Front Fences in accordance with SPP 4.6.3 for fences within 4.5metres of a frontage:

- 1.2 m high if solid
- 1.8m high if openings above the height of 1.2m of 30% transparency
- Currently there are numerous fences being constructed which flout these Codes and nothing is being done to ensure compliance . I f something is not done soon we will have a child run over due to lack of vision arising from solid fences over the 1.2m height limit. This is a major public safety risk.

### **5. Conclusion**

With the application of the Tasmanian Planning Scheme and the State Planning Provisions, it is imperative that the interests and suburban characteristics of larger urban Councils do not lead to, 'suburbs in the paddocks' and 'slums by the sea,' in rural and coastal communities.

Hence the importance of a strong Glamorgan Spring Bay Local Provisions Schedule which strengthens rural communities in villages such as Buckland and Orford, and townships such as Swansea and Triabunna through infill development which promotes the efficient provision of human and infrastructure services.

While strengthening our communities, the application of the GSB Local Provisions Schedule and SPP Codes must be enforced by strong compliance to protect Local Heritage Values and sites (Code C6.0), Natural Assets (Code C7.0), Scenic values and Protection (Code C8.0) including Front Fences, Town Gateways and main streets in addition to natural view fields of Maria Island, Mercury Passage, and Freycinet Peninsula.

In addition, preparedness for hazards such as Coastal Erosion (Code C10.0, Coastal inundation (C11.0), Flood prone areas (C12.0), and Bushfire prone areas (C13.0) need to be planned for, sometimes in long term and radical ways before it is too late (NB: I believe Clarence council is one who has addressed these issues, though the dwellings on Roches beach may well be at risk of storm events).

I understand the Insurance Institute of Australia regards the movement of cyclones further south to the Gold Coast currently constitute their most significant risk (in addition to bushfires now I suspect). As evidence elsewhere demonstrates sea walls are not the answer and only increase the rate of sand being sucked out to sea, so radical plans such as re-routing the Tasman Highway at a higher altitude than Raspins Beach before all the land gets built on along Alma Road (or elsewhere). This needs real vision and leadership!

I trust this Representation is accepted in the spirit of contribution in which it is made, and would be happy to meet with anyone and discuss any aspect of the content. Please call me on Mobile 0409 433 898 or contact me at this email address. I first came to the East Coast in 1950, so have seen both positive developments , mistakes made and missed opportunities..

