

Date 13/09/2021

Planning Department  
Northern Midlands Council

Via Email: [planning@nmc.tas.gov.au](mailto:planning@nmc.tas.gov.au)

Dear Planning Department

**RE: DRAFT AMENDMENT PLN 21-0189, 74 AND 86 EVANDALE ROAD, 2 TRANSLINK AVE, WESTERN JUNCTION – REPRESENTATION**

We appreciate the support of Council in initiating the draft amendment at its regular Council meeting on the 16<sup>th</sup> August, 2021. As the application has been placed on public exhibition until the 17<sup>th</sup> September, we wish to make a submission in relation to the modifications proposed by Council.

The Council modifications proposed to Area 6 of the Translink Specific Area Plan, are to insert new clauses F1.4.3 A6/P6 and F1.4.7 A9/P9 as shown below:

**F1.4.3 Materials and Presentation**

Acceptable Solutions	Performance Criteria
A6 Within Area 6 a variety of building forms must be used rather than single monolithic structures.	P6 The use of a variety of materials or other techniques to help reduce the interpreted scale of the building.

**F1.4.7 Open Space and Landscaping**

Acceptable Solutions	Performance Criteria
A9 Within Area 6, landscaping of lots adjacent to Evandale Main Road must incorporate mounding into the landscaping and shall conform to a comprehensive landscape plan approved by Council	P9 Landscaping provides effective screening of buildings and works from Evandale Main Road.

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While I don't have a particular issue with the wording of F1.4.3 A6/P6, I think it would be more appropriate for Council to simply modify clause F1.4.3 A1, so as to include Area 6 within the acceptable solution. No modification of the performance criteria wording would be needed.

The provision for A6 as proposed appears to be a duplication of A1, except for the fact that A1 does not currently refer to Area 6. Modifying A1 to include a reference to Area 6 avoids unnecessary confusion for anyone reading through the standard. Either way, we are happy for this clause to apply to Area 6.

My main concern relates to proposed clause F1.4.7 A9/P9. The proposed acceptable solution requires mounding, while the proposed performance criteria seeks to provide effective screening of buildings in the form of landscaping.

Firstly, there appears in part a contradiction between proposed clause F1.4.3 A6/P6 and proposed clause F1.4.7 A9/P9. Proposed clause A6 seeks to make the building more of an attractive feature, by incorporating a variety of building forms. In complying with this clause, it might be expected that any development would include various architectural components or cladding in order to ensure it was not a monolithic structure.

Upon designing such a building which is seen as more visually attractive, clause F1.4.7 A9 & P9, appears to require it be effectively screened.

If a developer wants to achieve compliance with A6, why should they then need to incorporate mounding or screening of buildings under A9?

It is further noted that there is no comment on the extent of mounding required under the acceptable solution, or what this should include. By definition, a 30cm mound along the front of the site could be enough to argue compliance with the acceptable solution. While I note this clause already exists for other areas in the SAP, it is in my opinion that the wording is too vague and carries too much uncertainty to be an acceptable solution.

Evandale Road itself is not a scenic corridor. It is not on any planning scheme overlay as providing any scenic amenity for users of the road. Evandale road is within an industrial estate. A brief analysis has been undertaken of buildings within 200m of the site, along Evandale Road.

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Figure 1 - Aerial view of site and analysis of visible buildings on Evandale Road within 200m

Photos of some of the buildings which are in the vicinity of Area 6 are shown below:



Figure 2 - New commercial building located at 6 Richard Street, 150m from site. Photo take from Evandale Road.

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*Figure 3 - Commercial buildings located at 18 Johns Street. Photo taken from Evandale Road*



*Figure 4 - United Petroleum Service Station, located on corner of Evandale Road and Translink Ave*

Particular attention is drawn to figures 3 and 4. Both of these existing developments are contained within Area 6 of the SAP. Should the additional SAP wording be retained, any future development of these lots (or the vacant lots in between) will need to address requirements for mounding or effective visual screening. It seems onerous that a service station (or similar development) would need to provide any visual screening for such a development under performance criteria.

Area 6 is different in nature and character to the heavier industrial uses found in other areas.

The permissible uses within Area 6 include:

- Food services (restaurant/takeaway)
- Hotel
- Vehicle Fuel Sales and Service (Service station)

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The discretionary uses within Area 6 include:

- Business and Professional Services (if an office)
- Bulky good sales (showroom)
- General Retail and hire
- Visitor accommodation (motel)

Based on a review of the possible uses in Area 6, it appears that providing mounding or effectively screening buildings would be contrary to the intent of allowing these uses.

We believe that while a warehouse development can provide an attractive development with a sense of street appeal, this can be done without the need for proposed clause F1.4.7 A9/P9. In my opinion, this clause creates too much uncertainty and doesn't align with the commercial (as opposed to heavier industrial) intent of Area 6 in the SAP.

It is my opinion that clause F1.4.7 will provide an adequate standard for landscaping of the site. In addition to this clause, Council has scope to request a landscaping plan under the application requirements in section 8.1.3 c) of the scheme, or condition this as part of any permit. Such a plan could be done to the satisfaction of Council, giving an opportunity for Council input.

Given a future development will be lodged for this site, we want to ensure the implications of this clause have been worked through, and any subsequent application can be assessed in compliance. I am happy to discuss any part of this submission.

Kind regards  
Woolcott Surveys



James Stewart  
Town Planner

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