

## Representation No 53

**From:** [Paul Thomas](#)  
**To:** [Break O Day Office Admin](#)  
**Subject:** LPS representation submission  
**Date:** Monday, 13 December 2021 3:03:46 PM  
**Attachments:** [Breakoday lps.pdf](#)

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Good afternoon,  
Please find attached representation regarding Break O'Day Council's LPS process. Could you please put forward the representation for me.  
Wishing all the team in the council a safe and Merry Christmas,  
Kindest regards,  
Paul

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**Paul Thomas**

Teacher

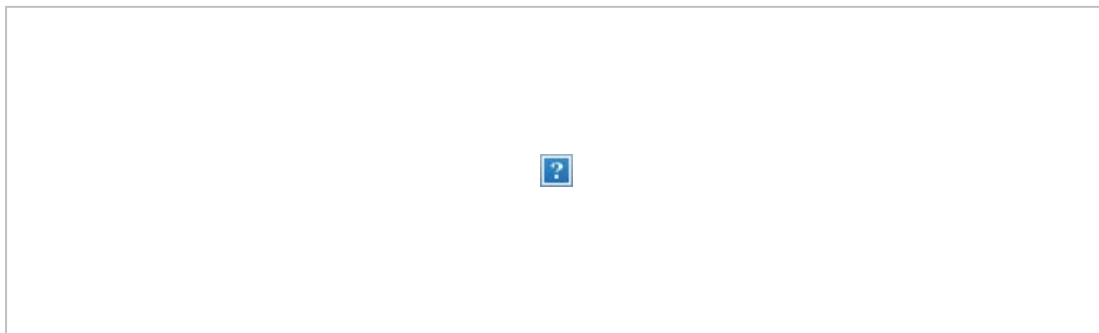
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With deep respect, St Patrick's College acknowledges the Tasmanian Aboriginal Community as the traditional and ongoing custodians of this land. We recognise their connection to the land, seas, air and waterways of lutruwita, and commit ourselves to the ongoing journey of reconciliation.

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I am writing as a rate payer of Break O'Day Council to contribute to the LPS process through representation. Firstly, there appear to be many good initiatives contained in the draft. I have some constructive feedback and wish to put in representation regarding the following:

**Subdivisions within 1km of the high water mark along the coast line:**

The fact that there is minimal development within these areas is one of the major reasons why the East Coast is recognised internationally for its uniqueness. Subdividing these areas would compromise this uniqueness. There is no getting away from the fact that development would undoubtedly result in loss of native habitat, see the introduction of problematic foreign flora, and introduce pets and pests that impact native fauna, and create a range of other issues.

All this combined with the clearing of native vegetation for fire protection and increased pressure for fuel reduction burns on adjoining properties including adjacent private land and Parks and Wildlife reserves would alter the landscape indefinitely.

Therefore, it is critical for long term environmental and economical sustainability (and for the international reputation of the Break O'Day Council community) that the prohibition of development within 1km of the high water is upheld. The world renowned natural values and ecological sensitivity of these areas needs to be reflected through robust protection and promotion of native flora, fauna, and respect for indigenous habitat. Development within these important areas would be an ad hoc approach and short sighted.

**Natural Assets Code:**

The biodiversity overlay in the code needs bolstering to be thoroughly inclusive regarding wildlife habitat corridors. Further, it needs to actively consider and highlight the importance of the connectedness of those wildlife corridors to the surrounding landscape. The biodiversity overlay needs to be both comprehensive and informative regarding this.

**Tourism accommodation outside serviced areas:**

Strata developments and multiple dwellings developments should definitely not happen, or even be considered within Landscape Conservation Zones, period. Nor should they be considered outside serviced areas. Areas zoned as conservation have been done so for important ecological reasons to promote the protection of native flora, fauna, and to respect indigenous habitat. Therefore, developments within these zones would be highly inappropriate and also disrespect first nation people. Further, it would compromise the Break O'Day Council community reputation- both nationally and internationally.

**Proposed Stormwater Specific Area Plan (SAP):**

A considerable amount of urban stormwater flows to waterbodies. The overall aim of a stormwater area Plan is to improve quality and reduce the amount of urban stormwater entering waterbodies through management systems. Given the East Coast of Tasmania is underpinned by a fragile ecosystem, more is needed to thoroughly ensure ecological impacts are avoided. The quality of the waterbodies to which the stormwater flows to are critical to aquatic ecology. Therefore, a priority should be the management of stormwater to reduce overland flow and to increase water quality at source and where this is impractical then as part of a local treatment process incorporated into the council stormwater infrastructure.

Stormwater water needs to be calmed and purified in a way that reduces flood and nutrient impacts through areas that contain indigenous aquatic species.

**Change Zoning from Rural to Landscape Conservation Zoning where the key land use is environmental protection and lifestyle:**

There are considerable amounts of private Land now zoned as rural, this includes areas between the Nicholas Range and the bottom of Elephant pass. Large areas surrounding St Marys also fall under this zoning. This results in industries with intensive uses not needing planning permits. Given most people have chosen properties in these areas to experience an environmental lifestyle, the majority of these properties should be zoned Landscape Conservation Zone.

**Split zoning of Agricultural zoned land:**

I'm in full support of split zoning of Agricultural zoned land where there are important landscape conservation and or scenic values with non farming areas zoned Landscape Conservation Zone.

**Zoning Future Potential Production Forests (FPPF) land as Environmental Management Zone:**

I'm in full support of zoning FPPF Land as Environmental Management Zones- in recognition of the FPPF areas of significant high conservation values and in some cases important scenic values

**Summary of the above representations:**

The East Coast of Tasmania's biggest asset is maintaining its natural values, and this is critical for long term economic and environmental sustainability. Therefore, state of the art planning and building codes need to be rigorously established.

An integral part of this process would be education and provisions for clever, state of the art subdivisional development that fosters connection with the landscape instead of removing of native flora- establishing home lots that are restricted to cleared land. For instance, land that previously supported paddocks, or similar. Established within this land should be community spaces and bike paths that potentially join reserves and townships directly. They should also have spaces that are revegetated.

Furthermore, the renovating of current properties need to reflect good design, too. Subsequently, building design guidelines, be it renovation or new development, need to reflect high-quality, attractive homes that will meet high standards of environmental performance. This should be supported with references regarding material palettes that are considered low embodied and so forth.

All the representations and related feedback I've outlined, if implemented, would go towards fostering a culture that measures performance by good design rather than size of dwellings and bling- raising the bar for all.

I would ask the Break O'day Council to seriously look at and discuss the masterplan for a subdivision called Mullum Creek in Victoria for reference. This development has attracted international attention and become an extremely desirable sustainable living environment that reflects and expresses the local landscape. The East Coast could be put on the map for similar reasons. I have attached a link for Mullum Creek for the Council's perusal.

<https://mullumcreek.com.au/app/uploads/161004-V8.2-MCDG.pdf>

I hope my representations and related feedback are useful to the Break O'day Council and help with the LPS process, in turn contributing to long term economic and financial and sustainability that showcases the Break O'day community.

Kindest Regards,

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