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**From:** Petra Wilden <pwilden@sbsc.tas.edu.au>  
**Sent:** Tuesday, 16 May 2023 12:30 PM  
**To:** TPC Enquiry  
**Subject:** Submission Regarding Draft Amendment AM2022.01 and Permit PA2022.0024

Respresentor: Petra Wilden, Tugrah Devonport, ph: 0477077078

Tasmanian Planning Commission  
Email: [tpc@planning.tas.gov.au](mailto:tpc@planning.tas.gov.au)  
Regarding Draft Amendment AM2022.01 and Permit PA2022.0024  
133 Middle Road, Miandetta (Devonfield).

Dear Tasmanian Planning Commission,

I refer to:

1. Letter dated 27 April 2023, Reference: 12590738 from Tom Reilly of GHD, and
2. Email of Tom Reilly, received 2 March 2023, and
3. Amended Permit PA2022.0024 (conditions 4. and 5. regarding covenants)

1a. In response to **'Devonfield maintains that the proposal advances the strategic objectives of both the Greater Devonport Residential Strategy and the Devonport Open Space Strategy'** and the email sent on the 2nd March from Tom Reilly. I would like to say the following.

The proposal, if going ahead, would support the **Greater Devonport Residential Strategy (GDRS)**, as lot 4 would add 48 houses towards the growth of Devonport. The DCC senior planner confirmed at the March hearing that the Strategy makes no provisions to distinguish between land for conservation, farmland, remnant native vegetation and community use and health, which leads to the conclusion that the report has not considered all of the factors important to create liveable cities. The GDRS is based on aspirational population growth goals, but fails to consider creating a city that can transcend liveability and aim to achieve a place one can truly love i.e. a loveable city, described in Appendix A-5 of the Open Space Strategy.

1b. The **Open Space Strategy** (Framework and Analysis Findings page 6) states, 'there are notable gaps in POS provisions...improvements are needed for POS quality... improvements for access and connectivity to existing POS are recommended'. Figure 5 page 14 shows Devonport planning zones map, and reveals the lack of planning for POS.

Lot 4 Devonfield is an exceptionally good quality open space that needs support from Council to uphold, not fragment.

The Open Space Strategy has a strong emphasis on human interaction with POS, and reveals the importance for health and wellbeing. It's not till the end of the report when there is real attention paid to the health and biodiversity of the remnant bushland within POS and how to address this. Appendix A-5 page 63 Bio-Connectivity in Devonport states 'it is crucial to establish connectivity between habitat-providing urban green spaces. It recommends to maintain and protect existing natural assets. It has concluded that the city's existing public open spaces do not yet provide quality habitat for biodiversity.

**'Existing natural assets are invaluable and irreplaceable, therefore stewardship through responsible use and protection of the natural environment is imperative to ensure intergenerational environmental equity'** (A-5 page 17)

Five hundred and forty two signatures were collected in a week in opposition of this application and in the Open Space Strategy the people of Devonport have made the following statements.

12.2.5 page 35, Stoney Rise states that 'people who use this area love having open space close to their homes and appreciate the natural values, that it's quiet scenic and safe. It's peaceful, close and a great area for exercising.

12.2.6 page 36 Miandetta 'the community have a strong connection to the natural values of this area. The nature, trees and open space are highly valued.

The Devonfield forest provides exactly this, an accessible and quality native biodiversity habitat, close to the city, when 48 lots of housing are created right in the middle of this quality native biodiversity habitat, it will completely compromise this important habitat.

The open space zone (lot 7a) gifted to DCC is unsuitable for residential development as it is a transmission line corridor which is regularly slashed, it is a great addition to the quality forest lying just above it, but if that will be developed, lot 7a will not be able to provide good habitat on its own. So the proposal does provide more POS land for the community but it does not advance once again the objectives of maintaining and protecting existing natural assets, which have special values e.g. threatened species. **'The stability of the species has a direct correlation with the complexity of the network structure'** (Appendix A-5 page 5)

1c. Noted in the email by Tom Reilly on the 2nd March: page 13 of the GDRS: **'Existing residential land supply is recognised as a significant impediment to (Devonport's) population growth'**.

The GDRS is based on aspirational population growth goals, (not in line with the Department of Treasury's projections, page 9) which creates a time issue straight away and in return puts pressure on land supply. The report does mention a range of strategies to find land for housing and so land should not be seen as such a constraint that we keep on selling off bushland. as ecosystems have no voice, and delay working with people who own land which doesn't hold native bushland.

Devonfield's land should not be regarded as 'empty' or 'of no significant value' as described by the environmental assessor. The Strategy needs to acknowledge bushland and designate and protect more areas for conservation and support higher density housing close to it, so there is room for supporting high biodiversity as well as development. Developers can be asked to develop in a more inclusive way.

3. Tom Reilly claims that the book **'Devonfield's wonderland' and additional indexes fails relevance and reliability**. The book is made by locals living in the area who have a close relationship with the forest and its creatures. It is a truthful snapshot of the biodiversity within the forest.

I challenge the value of the **Natural Values Report by GHD**, which is based on a desktop assessment and 2 site visits, 10/12/2020 and 28/5/2021, in comparison with locals who have lived in the area for years.

The Natural Values Report (page 194) states **'Forested areas provide potential foraging but no denning/nesting habitat for wide ranging species threatened species such as devils, quolls, eagles and owls. Clearing of up to 4.7ha of Wet E. obliqua forest will be required to allow residential development and bushfire protection measures on proposed Lot 4. The impact on these wide ranging species is not likely to be significant provided areas on lot 7, open space continue to provide alternate habitat in the area'**.

Of course it will affect the wide ranging species, as a big chunk of their habitat that provides food will be cleared. As mentioned before, lot 7 does not provide alternative habitat, as it is heavily compromised being under a powerline corridor. Also discussed during the hearing was that the forest, being 50 plus years old, is close to starting to provide nesting and denning habitat, essential for the threatened and all other species using this forest.

Two site visits are very minimal to determine wide ranging features in the landscape and many could have been missed - a very important factor in considering the true picture of the biodiversity and the many species within it.

4a. **Devonfield maintains that the upper elevations of the site have no special significance that should be prioritised over residential use.**

The term of no special significance does not reflect the attitudes expressed of locals (page 35,36 Open Space Strategy). The greenbelt as it is, is a stunning landmark when approaching Devonport from Spreyton, it is quite unacceptable that this landmark will disappear without having considered locals opinions.

From a hydrological point of view, clearing the top of a hill is very bad practice, it will cause severe erosion, which will affect the development, the remaining vegetation, the fauna including the burrowing crayfish, as drainage will change. It will also destroy the beauty of the existing landmark, as the vegetation will be cleared on top. Many residents will be very unhappy, most Devonport residents still have no idea about this development that could, when approved, wipe out the character of the Miandetta area.

We all know there is a shortage of housing and we all want to improve this, but it needs to be done in an integrated way, where we don't forget about the health and wellbeing of our citizens, ecosystems and climate.

Thank you,

Petra Wilden

**Petra Wilden**

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