



DOURIAS GROUP HOLDINGS

Dourias Group Holdings
PO BOX 3193, WEST HOBART
TASMANIA, 7000
Email: douriasgroup Holdings@gmail.com
6th December 2023
Ref: RZ 2022-05

Dan Ford
Tasmanian Planning Commission
Level 3, 144 Macquarie Street
Hobart TAS 7001

Emailed to: tpc@planning.tas.gov.au

Dear Mr Ford,

Tasmanian Planning Scheme – Brighton Response Submission - Draft Amendment RZ-2022-05

I write in response to your letter dated 23rd November 2023 advising that response submissions will be accepted by 6th December 2023 with regard to the Draft Amendment RZ-2022-05 for the South Brighton Specific Area Plan.

As the Brighton Council and the Tasmanian Planning Commission are aware Dourias MGH Pty Ltd and 69 Brighton Road Pty Ltd together are the largest landowners within the South Brighton Development Precinct Area. We own the following parcels of land:

a) 69 Brighton Road (CT 179925/1) -	24.6ha* (11 ha in Specific Area Plan*)
b) 1 Dylan Street (CT 143361/1) –	1.014ha
c) 12 Dylan Street (CT 143361/12) –	1.357ha
d) 16 Dylan Street (CT 143361/10) –	1.146ha
e) 17 Dylan Street (CT 143361/9) –	1.213ha
f) 15 Dylan Street (CT 143361/8) –	1.225ha
TOTAL AREA	30.555ha

<u>TOTAL AREA IN SAP ONLY</u>	<u>16.955ha</u>
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The land owned by Dourias MGH Pty Ltd and 69 Brighton Road Pty Ltd is shown in Figure 1.

Both Dourias MGH Pty Ltd and 69 Brighton Road Pty Ltd have actively engaged with the Brighton Council through the development of the South Brighton Development Precinct Master Plan and Planning Scheme Amendment Process. We remain supportive of the project and direction of the amendment RZ 2022/05.



Figure 1 – Dourias Group Holdings land ownership South Brighton Development Precinct area (Source: theLIST Mapping Services)

As a response to the submissions, I provide the following:

1. Staging

We do not support the introduction of a development staging plan for the proposed South Brighton Specific Area Plan.

We note that the plan showing potential stages for development in Attachment A of the submission provided by the Brighton Council dated the 10th November 2023 shows “potential first movers” is not a staging plan and is showing land areas which are likely to be developed in sequence through the ordinary planning and development process.

We otherwise support Council’s position as outlined in their submission dated 10th November 2023 and that the private development market will work through design, planning and property matters. We highlight that Dylan Street, Brighton Road, Williams Street and Melinda Court provide suitable existing roads that will facilitate and enable a logical sequence of development.

2. Light Industrial Zone for the Brighton Highway Services Precinct

We ask that the Brighton Council clarify there will be no additional buffer or setback requirements imposed on development, and in particular a sensitive use i.e., residential development within the South Brighton Specific Area Plan area as a result of the application of the Light Industrial Zone. This has relevance to our land in the vicinity of the Brighton Highway Services Precinct.

Our concern is that the Light Industrial Zone is ordinarily applied to land for the purpose of providing a zone for manufacturing, processing, repair, storage and distribution of goods and materials. This allows for a range of activities that have potential for environmental emissions and would be subject to the standards of the C9.0 Attenuation Code.

We note that the proposed BRI-S3.1.5 Use Table provides an entirely revised use table for this land, that replaces the 18.2 Use Table in the Light Industrial Zone. The BRI-S3.1.5 has largely eliminated the many activities that may have potential to cause emissions as listed in the 18.2 Use Table and as otherwise listed in the Table C9.1 Attenuation Distances in the Attenuation Code. This should satisfy our concerns for such use or activities that have potential for environmental emissions.

However, we ask that this be discussed through the reconvened hearing and that Council can confirm that the Light Industrial Zone and the General Residential Zone together with the proposed standards for the BRI-S3.0 Brighton Highway Services Precinct Specific Area Plan and the BRI-S3.0 Brighton Highway Services Precinct Specific Area Plan have been considered in relation to avoidance of land use conflict between intended land use and development.

In addition to the above we will attend the reconvened hearing and continue to participate in the planning scheme amendment process. We may raise further matters at such a hearing but in principle agree to the direction of the amendment.

For any clarification in relation to the above then please contact me on 0413 590 488 or email douriasgroupholdings@gmail.com

Sincerely,

Tony Dourias

Obo - Dourias MGH Pty Ltd and 69 Brighton Road Pty Ltd