
From: Justine Brooks [REDACTED]
Sent: Tuesday, 5 May 2026 12:18 AM
To: Kingborough LPS
Subject: Submission - KCC LPS - A Gleeson [REDACTED] Kingborough
Attachments: Submission - KCC LPS - Ireneinc Review - [REDACTED] Neika
JB040526.pdf

Please find attached a submission to the KCC LPS – Ireneinc Review Report on behalf of Amanda Gleeson of [REDACTED].

Kind regards

Justine

pitt&sherry

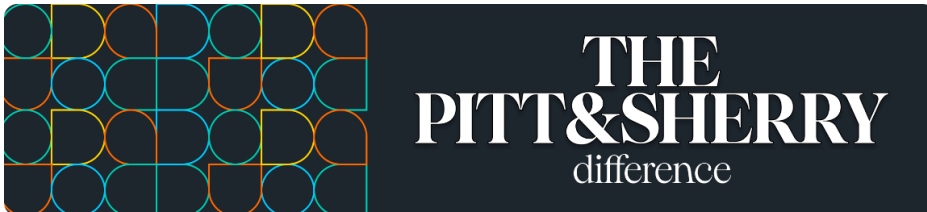
Associate Project Manager
Urban Planner

Justine Brooks RPIA GTLP

MEnvPlg MBA
DipPM DipGov(PM)

+61 429 201 271
jbrooks@pittsh.com.au

Level 2, 93 York St, Launceston, TAS, 7250
PO Box 1409 Launceston Tasmania 7250 | Phone +61 3 6323 1912



pitt&sherry acknowledges the Traditional Custodians of the many Countries throughout Australia and their connections to land, sea and community. We acknowledge the contributions and sophistication of Aboriginal and/or Torres Strait Islander knowledge



[Book time to meet with me](#)

**Pitt & Sherry
(Operations) Pty Ltd**
ABN 67 140 184 309

Phone 1300 748 874
info@pittsh.com.au
pittsh.com.au

Located nationally —
Melbourne
Sydney
Brisbane
Hobart
Launceston
Newcastle
Devonport

45 May 2026

Tasmanian Planning Commission
Via email: kingboroughlps@planning.tas.gov.au

**Submission to the Tasmanian Planning Commission
Draft Kingborough Local Provisions Schedule
Response to Direction 69 and Ireneinc Review
Land at [REDACTED], Neika**

Prepared by: Justine Brooks, RPIA
Role: Associate Project Manager and Urban Planner – pitt&sherry
Prepared for: Amanda Gleeson and Sharn Daly
Date: 29th April 2026



1. Executive Summary

This submission responds to the Ireneinc review prepared for Kingborough Council about the draft Kingborough Local Provisions Schedule and the proposed application of the Landscape Conservation Zone (LCZ) to land at [REDACTED], Neika.

The subject land is an established rural lifestyle holding of just over 8 hectares. It contains an existing dwelling, several outbuildings, and the typical improvements that support long-term residential use in a bushland setting. The subject land is already used for rural living and forms part of an established pattern of dispersed lifestyle development along Morphetts Road. The proposed application of the Landscape Conservation Zone is not supported because it does not reflect how the land is used and managed.

The subject land is not undeveloped conservation land. It is an occupied and managed rural residential holding where the main land use is residential living, supported by ongoing land management (including fuel reduction, weed control, and other domestic-scale rural activities). The key issue for this land is not whether vegetation exists. It clearly does. The key issue is whether the presence of vegetation justifies applying a conservation-led zone to land that is already settled, occupied, and reliant on active management to remain safe and usable. It does not.

The Landscape Conservation Zone places conservation at the centre of the planning outcome. That is not the main purpose of this land.

The Rural Living Zone (RLZ) is the most appropriate zone because it reflects:

- the existing use of the land;
- the established settlement pattern in the locality;
- the practical realities of land management in a bushfire-prone area; and
- the need to balance residential occupation with landscape values, rather than elevating one above the other.

The preferred outcome is therefore application of the RLZ.

2. Introduction

This submission is made on behalf of the landowner of [REDACTED] Neika. It responds to the Ireneinc review prepared for Kingborough Council following Direction 69 issued by the Tasmanian Planning Commission in relation to the draft Kingborough Local Provisions Schedule.

The draft Local Provisions Schedule proposes applying the Landscape Conservation Zone to the subject land.

That outcome is not supported.

The subject land is already used for residential living on a large rural lifestyle lot. It contains an established dwelling and associated outbuildings and is managed in the same practical way as surrounding lifestyle properties in the area.

This submission contends that the proposed Landscape Conservation Zone does not properly reflect:

- the current function of the land;
- the way the land is actually used;
- the established settlement character of [REDACTED]; or
- the practical safety and land management needs of residents in this locality.

The more appropriate planning outcome is the RLZ.

3. The Land and Existing Character

The subject land at [REDACTED] comprises just over 8 hectares and contains an established dwelling and several associated outbuildings.

The land is used as a rural lifestyle property and exhibits the characteristics typical of long-established residential occupation in this part of Neika, including:

- an established dwelling;
- ancillary domestic structures;
- private access arrangements;
- managed garden and cleared areas;
- ongoing vegetation management; and
- domestic-scale rural living use.

A road reserve dissects the front portion of the title, further fragmenting the land and reducing its practical cohesion as an intact conservation parcel.

That is a relevant physical characteristic of the land.

The subject land is not an unmodified bushland holding. It is already fragmented, improved and occupied.

Its dominant function is residential occupation on a large lifestyle lot, not conservation.

That is the planning reality the zoning should respond to.

4. Site Condition and Land Management Context

Like many properties in the [REDACTED] and wider Neika area, the subject land is vegetated but actively managed.

It is not pristine or undisturbed bushland.

The land is affected by the same practical land management issues experienced across surrounding titles, including:

- weed infestation;
- introduced plant species;
- introduced animal species;
- fuel accumulation;
- ongoing vegetation management burdens; and
- the need for regular land maintenance to manage safety and usability.

Consistent with surrounding properties, the landowner reports the presence of weed species and introduced flora and fauna across the land and surrounding locality.

This is not unusual in the area and reflects a modified bushland-residential interface rather than an intact conservation landscape.

In practical terms, this means the land requires active and ongoing intervention to remain safe and manageable.

That is the functional character of an occupied rural living property, not conservation land.

5. Natural Values and Site Constraints

A review of LISTmap layers and available mapping does not identify any recorded threatened flora, threatened fauna, or mapped site-specific conservation values affecting the subject land.

This is consistent with the broader pattern across nearby lifestyle lots in this part of Neika.

That does not suggest the land is without environmental value.

It does, however, indicate that the land is not distinguished by mapped natural values such that conservation should become the dominant strategic purpose of the land.

This distinction is important.

The existence of vegetation is not, of itself, sufficient to justify a conservation-led zone.

The planning question is whether environmental values are the dominant strategic purpose of the land.

For this land, they are not.

6. Response to Ireneinc Review

The Ireneinc review acknowledges that parts of Neika exhibit an established rural residential pattern characterised by:

- larger lots;
- existing dwellings;
- dispersed residential occupation; and
- a semi-rural settlement character.

That description aligns closely with the subject land and the wider [REDACTED] locality. The subject land is already part of that settlement pattern.

Application of the RLZ would recognise that existing character and formalise the planning response accordingly.

It would not create a new settlement outcome.

It would recognise the one already established.

The Ireneinc review also accepts that Rural Living may be appropriate where an existing rural living pattern is already present and where applying the RLZ would not materially intensify development.

That is the case here.

7. Section 8A Guideline Assessment

The Section 8A Guidelines require the Commission to apply the zone that best achieves the purpose of the zone, to the greatest extent possible.

That test favours the RLZ.

The RLZ is intended to apply to land where:

- residential occupation occurs in a rural setting; and
- lower-order rural and lifestyle activities occur alongside residential use.

That is the clearest description of the subject land.

By contrast, the Landscape Conservation Zone is intended for land where landscape protection is the dominant planning purpose.

That is not the dominant purpose here.

The land is already occupied, improved and functioning as a rural lifestyle property.
The RLZ is therefore the stronger statutory fit.

8. Bushfire Risk and Land Management

Bushfire risk is a central concern for this landowner and a material planning issue for this land. The subject land sits within a heavily vegetated locality where safe occupation depends on active and ongoing land management.

This includes:

- vegetation thinning;
- weed removal;
- defendable space management;
- fuel reduction;
- maintenance of access corridors;
- hazardous tree management; and
- ongoing reduction of fuel continuity around the dwelling and outbuildings.

These are not optional land management tasks in this locality.
They are basic risk mitigation measures required to safely occupy land in a bushfire-prone environment.

A conservation-led zone risks adding unnecessary uncertainty, delay, and cost to routine safety works by placing landscape retention ahead of practical risk management.

That is a poor planning outcome in a locality where people already live and where ongoing hazard reduction is necessary to reduce risk to life and property.

For this land, the practical implications of zoning are not abstract.

They directly affect whether residents can safely maintain defensible space, reduce fuel loads, and manage the land around their home in a timely and practical way.

9. Cross-Boundary Planning Consistency

Cross-boundary consistency is also relevant in this locality.

The Section 8A Guidelines and section 34(2)(g) of LUPAA require zoning to be coordinated with adjoining municipal areas, as far as practicable.

That is relevant here, particularly given the comparable residential settlement pattern in nearby parts of the Hobart municipal area, including Fern Tree, where similar bushland-residential land is zoned RLZ.

The municipal boundary does not alter:

- the landscape character;
- the vegetation;
- the bushfire exposure;
- the settlement pattern; or
- the practical land management burden.

Where comparable land in similar physical circumstances is zoned RLZ in one municipal area, there should be clear planning justification for treating similar occupied lifestyle land as Landscape Conservation in another.

That justification is not apparent here.

10. Why the RLZ is the Better Fit

The RLZ is the better fit because it reflects the actual role this land performs: an occupied lifestyle property, not passive conservation land.

It is an occupied lifestyle property where:

- residential occupation is the primary use;
- land management is ongoing;
- vegetation requires active intervention;
- bushfire mitigation is essential; and
- landscape values coexist with practical residential use.

That is exactly what the RLZ is intended to accommodate.

It provides the more balanced and realistic planning response.

11. Conclusion

The subject land at 79 Morphetts Road is not best understood as conservation land. It is an established rural lifestyle property already occupied for residential use and already dependent on active land management to remain safe, functional and usable.

The proposed Landscape Conservation Zone does not properly reflect the way the land is used, the character of the surrounding locality, or the practical realities of living on and managing land in this part of Neika.

The dominant planning purpose of this land is not conservation.

It is rural living.

That is the land use the zoning should recognise.

For these reasons, the landowner respectfully requests that the Commission reject the proposed Landscape Conservation Zone and apply the RLZ to [REDACTED], Neika.