
From: Courtney Collins <[REDACTED]>
Sent: Monday, 4 May 2026 8:54 PM
To: Kingborough LPS
Subject: Submission — Kingborough LPS Direction 69— [REDACTED] Bonnet Hill
Attachments: 20260504_Subimission of C Collins [REDACTED] Bonnet Hill.pdf

Good evening

Please find attached my submission response to the letter dated 2 April 2026 (ref: DOC/26/36829) in relation to the Kingborough LPS and Ireneinc Report.

I confirm my property is [REDACTED], Bonnet Hill, Certificate of Title #1 [REDACTED] and Property Identification # [REDACTED].

Kind regards

Courtney Collins
[REDACTED]

To the Tasmanian Planning Commission

I write in response to the letter dated 2 April 2026 (ref: DOC/26/36829) advising that the Ireneinc report recommends my property be included within the Rural Living Zone (RLZ) under the draft Kingborough Local Provisions Schedule (LPS), rather than remaining in the Landscape Conservation Zone (LCZ) as exhibited.

I previously made a representation on the draft LPS, through another representative, Caleb Elcock, disputing application of the LCZ.

I understand that my representation has not yet been heard and will be heard at a future hearing.

I understand that this letter provides me the opportunity to make a written submission in relation to the Ireneinc recommendations, and that I may speak to this submission when I appear before the Commission.

I take up that opportunity and submit as follows:

Procedural Issue

- 1 The residents of properties that Kingborough newly proposes to rezone as Rural Living have not been accorded a proper opportunity to respond as Kingborough has not specified whether it proposes to classify the properties as Rural Living A, B, C, D.
- 2 LP1.2.2 of the *State Planning Provisions* requires that Local Provision Schedules must specify whether land is zoned Rural Living Zone A, B, C, or D.
- 3 Residents' position in relation to the Rural Living Zone may differ depending on the classification proposed.
- 4 Directions are sought to require Kingborough to specify a classification of A, B, C or D for each property it proposes to zone Rural Living, and to provide further opportunity for residents of those properties to make written submission to the Commission in response to the proposed classification.

Summary of Submission

- 5 It is submitted that the properties in Bonnet Hill that Kingborough proposes to rezone as Rural Living, including my property at [REDACTED] the Bonnet Hill Properties) should be re-zoned Low Density Residential on the basis that:
 - A. Low Density Residential is the appropriate zone for the Bonnet Hill Properties.
 - B. Rural Living is not an appropriate zone for the Bonnet Hill Properties.

C. The *Southern Tasmanian Regional Land Use Strategy* (STRLUS) supports the development of land outside the Urban Growth Boundary, particularly by way of SRD 2.12.

D. Bonnet Hill meets the criteria in SRD 2.12.

- 6 In the alternative, if the Commission is minded to allow application of the Rural Living Zone to the Bonnet Hill Properties, it is submitted that the Bonnet Hill Properties should be zoned Rural Living A, in compliance with SRD 1.4, which directs the planning authorities to:

“Increase densities in existing rural living areas to an average of 1 dwelling per hectare, where site conditions allow.”

Bonnet Hill

- 7 Bonnet Hill is situated within *Greater Hobart*, as defined by the *Greater Hobart Act 2019* and STRLUS.¹
- 8 Greater Hobart is a settlement² and Bonnet Hill is a suburb of the settlement.
- 9 In accordance with Table 2 of the STRLUS, which defines the Settlement Network, Bonnet Hill meets the definition of dormitory suburb of Greater Hobart as:
- It comprises predominantly residential settlements
 - Residents are highly dependent upon services and facilities within the metropolitan area of Greater Hobart, particularly for employment
 - The current population is less than 2000; and
 - Properties are connected to electricity and town water.
- 10 The vast majority of properties in Bonnet Hill are zoned Low Density Residential. In accordance with the *Kingborough Interim Planning Scheme 2015*:
- 159 properties are zoned Low Density Residential
 - 49 properties are zoned Environmental Living
 - 6 properties are zoned Rural Living
 - 3 properties are zoned Environmental Management; and

¹ *Greater Hobart or Greater Hobart Area* - Means the land contained within the Statistical Local Areas (ABS statistical data unit) of Brighton, Clarence, Glenorchy, Hobart Inner, Hobart Outer, Kingborough Part A and Sorell Part A. It includes the metropolitan area and dormitory suburbs. (STRLUS page 12)

² *Southern Tasmanian Regional Land Use Strategy* pages 84, 90

- 2 properties are zoned Open Space.³

- 11 These figures indicate a dominant Low Density Residential character.
- 12 Bonnet Hill is a unique suburb of Greater Hobart as it is bounded on both sides by suburbs within the Urban Growth Boundary.
- 13 Bonnet Hill lies between the more densely developed suburbs of Kingston and Taroona which are identified for development as part of the Greater Hobart metropolitan area, and within the Urban Growth Boundary.⁴
- 14 Bonnet Hill is a mere 15 minutes' drive from Hobart city centre and accessible only by Channel Highway, via Kingston or Taroona.
- 15 Due to its unique position, any development within Bonnet Hill is unlikely to result in conventional urban sprawl due to its constrained geography and location between established urban areas.
- 16 It is notable that there is currently no growth management strategy for Bonnet Hill specified in the STRULS (Table 3).
- 17 That omission is significant as no growth limit has been set and it indicates that the future of Bonnet Hill has not been decided.
- 18 Due to its location, there is a significant chance that Bonnet Hill will be identified for development in future, consistent with broader metropolitan planning objectives favouring urban consolidation, renewal of underutilised land, and increased housing diversity in existing urban areas.⁵

Low Density Residential

- 19 The Section 8A Guideline provides that the primary objective in applying a zone is to achieve the zone purpose to the greatest extent possible. This requires that zoning reflect the actual use, constraints, and strategic function of the land, rather than being applied for unrelated purposes.
- 20 The appropriate zone for the Bonnet Hill Properties is Low Density Residential as the zone purpose most closely aligns the zone to the actual use of the land.
- 21 The purpose of the Low Density Residential Zone⁶ is:

³ These numbers have been identified through counting the properties within Bonnet Hill on ListMap and may be subject to human error.

⁴ *Southern Tasmanian Regional Land Use Strategy* pages 89, Map 10; *30 Year Greater Hobart Plan*

⁵ *30 Year Greater Hobart Plan* encourages urban renewal of underutilised land for residential development; prioritise urban consolidation to create a more walkable and accessible compact city; enable well designed medium-density developments within existing neighbourhoods and higher density dwellings in appropriate locations

⁶ *Tasmanian Planning Scheme - State Planning Provisions* page 89

10.1.1 To provide for residential use and development in residential areas where there are infrastructure or environmental constraints that limit the density, location or form of development.

10.1.2 To provide for non-residential use that does not cause an unreasonable loss of amenity, through scale, intensity, noise, traffic generation and movement, or other off site impacts.

10.1.3 To provide for Visitor Accommodation that is compatible with residential character.

11 STRLUS SRD 1.6 limits the application of the Low Density Residential Zone as follows:

“Utilise the Low Density Residential Zone only where it is necessary to manage land constraints in settlements or to acknowledge existing areas.”

22 Bonnet Hill Properties are in a residential area with both infrastructure (including limited sewerage capacity) and environmental (topography and vegetation) constraints that limit the density, location or form of development, consistent with the purpose and application criteria for the Low Density Residential Zone in the Section 8A Guideline.

23 The Section 8A Guideline provides that the Low Density Residential Zone should be applied to existing residential areas characterised by larger lots or constrained infrastructure, or where there is a strategic intention not to support higher density development. Bonnet Hill satisfies each of these criteria.

24 Bonnet Hill is the type of locality contemplated by SRD 1.6 and the Guideline as it is:

- an existing area with an overwhelming majority of properties zoned low density residential
- already residential in character
- constrained by lack of sewer connection, slope, and landscape; and
- requires a moderated residential zone rather than full suburban intensity, consistent with the intended application of the Low Density Residential Zone under the Section 8A Guideline.

25 The Section 8A Guideline also provides that the Low Density Residential Zone should not be applied for the purpose of protecting areas of important natural or landscape values. To the extent that landscape values are present in Bonnet Hill, those values are more appropriately managed through applicable codes and overlays rather than by applying an inappropriate zone.

26 The Low Density Residential Zone appropriately balances:

- recognition of existing low density residential settlement

- the residential use of the land
- lot size control; and
- management of environmental constraints.

27 While some limited and logical development may occur, Bonnet Hill is not suitable for higher-density residential zoning due to its infrastructure and environmental constraints, making the Low Density Residential Zone the most appropriate strategic response.

Rural Living Zone

28 There is a clear intent in the STRLUS to restrict indiscriminate application of the Rural Living Zone.

29 STRLUS SRD 1.3 restricts the application of rural living zones to existing rural living communities, and imposes specific criteria where land is to be newly rezoned to rural living, including that it is consistent with the purpose of the Rural Living Zone.

30 This is reinforced by the Section 8A Guideline, which requires that the Rural Living Zone be applied only where the existing and intended use is residential in a rural setting with larger lots and a mix of rural activities.

31 The purpose of the Rural Living Zone⁷ is:

11.1.1 To provide for residential use or development in a rural setting where:

(a) services are limited; or

(b) existing natural and landscape values are to be retained.

11.1.2 To provide for compatible agricultural use and development that does not adversely impact on residential amenity.

11.1.3 To provide for other use or development that does not cause an unreasonable loss of amenity, through noise, scale, intensity, traffic generation and movement, or other off site impacts.

11.1.4 To provide for Visitor Accommodation that is compatible with residential character.

32 Bonnet Hill is not an existing rural living community and Bonnet Hill does not exhibit the characteristics typically associated with a rural setting in the sense contemplated by the Section 8A Guideline. It does not exhibit a mix of residential and rural lifestyle uses, nor is it characterised by limited services.

33 As the terms 'rural setting' and 'rural' are not defined in the STRLUS or Land Use Planning and Approvals Act 1993, and their ordinary meanings are to be applied.

⁷ *Tasmanian Planning Scheme - State Planning Provisions* page 103

- 34 There are many definitions of rural setting. However, a key feature of these definitions includes separation or distance from towns or cities and the infrastructure these urban areas provide.
- 35 This is consistent with the text of STRLUS, which requires, in two instances, that land not currently zoned rural living may only be zoned as such where the land is not adjacent to the Urban Growth Boundary for Greater Hobart.
- 36 That repeated criterion indicates a deliberate strategic distinction between:
- land proximate to metropolitan urban growth areas; and
 - genuinely rural living land outside those metropolitan interfaces.
- 37 Bonnet Hill is adjacent to, and embedded within, the Greater Hobart metropolitan structure. It is not a remote or detached rural locality.
- 38 Further, the Section 8A Guideline provides that the Rural Living Zone should not be applied unless it reflects the existing pattern and density of development or is supported by further strategic justification.
- 39 Bonnet Hill does not exhibit a pattern of development consistent with a rural living area.
- 40 Bonnet Hill has majority Low Density Residential properties, with access to established infrastructure, including electricity and town water, and lack of rural activity character.
- 41 Bonnet Hill is not, in ordinary planning terms, best characterised as a rural setting.
- 42 Historically, Bonnet Hill may once have had a rural character. However, successive subdivision, metropolitan expansion, and the growth of Kingston and Hobart have materially changed that context.
- 43 To zone established suburban residential land as Rural Living would mischaracterise its present strategic function.

Growth Outside the UGB

- 44 The STRLUS provides for growth outside the Urban Growth Boundary, particularly by way of SRD 2.10 and SRD 2.12.
- 45 The proposition that no growth may occur outside the UGB is incorrect.
- 46 Particularly where no growth limit has been set for Bonnet Hill.
- 47 STRLUS SRD 2.12 expressly provides that:
- “Land outside the Urban Growth Boundary shown in Map 10 may be considered for urban development if it:*

(a) shares a common boundary with land zoned for urban development within the Urban Growth Boundary...”

- 48 SRD 2.12 further contemplates where such land provides only a small and logical extension to urban land, subject to infrastructure and strategic planning considerations.
- 49 Consistent with SRD 2.12, SRD 2.10 requires the investigation of redevelopment to higher densities potential of rural residential areas close to the main urban extent of Greater Hobart.
- 50 Similarly, SRD 1.4 mandates the increased density to 1 residence per hectare in rural communities.
- 51 Accordingly, the STRLUS does not impose a blanket prohibition. It creates a controlled exception framework.

Bonnet Hill meets the criteria in SRD 2.12

- 52 Bonnet Hill adjoins and sits between existing urban areas of Taroona and Kingston.
- 53 It already contains an established residential settlement pattern, including existing dwellings, roads and subdivision structure.
- 54 Rezoning the Bonnet Hill Properties to Low Density Residential would constitute a small and logical extension or rationalisation of the present metropolitan edge, and would not create sprawl.
- 55 Such rezoning would recognise the reality of an existing suburban settlement pattern, rather than create a new isolated growth front.
- 56 Bonnet Hill is close to existing services, transport corridors, employment centres and utilities, unlike genuinely remote fringe land.
- 57 Any site-specific environmental or scenic constraints can be managed through overlays, codes, or tailored development standards rather than by imposing an inappropriate zone.

Alternative Submission: Rural Living A

- 58 If, contrary to the above submissions, the Commission determines that the Bonnet Hill Properties should be zoned Rural Living, then it is submitted that the properties should be classified Rural Living A.
- 59 The existing lot pattern in Bonnet Hill is consistent with lots of approximately 1–2 ha, consistent with the requirement in the Section 8A Guideline that Rural Living subzones reflect the existing pattern and density of development.

- 60 This classification is compliant with the STRLUS SRD 1.4 requirement for increased density to 1 residence per hectare in existing rural living areas where conditions allow.
- 61 Any lower-intensity classification would be inconsistent with the STRLUS and unnecessarily prevent reasonable future use given the location and strategic context of Bonnet Hill.

Conclusion

- 62 For the reasons set out above, I submit that:
- The exhibited Landscape Conservation Zone was not appropriate for my property and should not be reinstated.
 - The Low Density Residential zone is appropriate for my property and should be applied.
 - In the alternative, the most appropriate Rural Living Zone subcategory for my property is A, which reflects the existing pattern and density of development in Bonnet Hill and significantly constrains further subdivision.
 - Any landscape values in Bonnet Hill can be appropriately managed through existing overlay controls—NAC, PVA overlay, and SPC—in combination with the lot size controls of the Low Density Residential Zone or Rural Living Zone A.

[REDACTED]

Courtney Collins

[REDACTED], Bonnet Hill

[REDACTED]

4 May 2026