
From: Karen Groves <[REDACTED]>
Sent: Sunday, 3 May 2026 1:26 PM
To: Kingborough LPS
Subject: Group submission letter - regarding direction 69 and Irenelnc review
Attachments: Collective TPC Letter - Snug Tiers.Snug Falls .pdf; Snug Tiers Settlement by lot - map a.pdf; Snug Tiers Living Intent - map b.pdf; Snug Falls living intent.jpg; Snug Falls settlement lot sizes.jpg

To whom it may concern,
Please accept the following as a group letter for the Snug Tiers.Snug Falls settlement area (Irenelnc locality Snug and Coningham) to inform upcoming hearings in the Kingborough LPS process,
Yours sincerely,

Karen Groves | Teacher | Trainer
(M) [REDACTED]

I acknowledge and pay respect to the Tasmanian Aboriginal Community as the traditional and original owners of lutruwita/trowunna (Tasmania) and as the enduring custodians of the lands, seas, air and waterways. I pay respect to Elders past, present and emerging.

WRITTEN SUBMISSION TO THE TASMANIAN PLANNING COMMISSION
Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report
COLLECTIVE SUBMISSION – SNUG TIERS/FALLS

Locality	Snug Tiers and Snug Falls communities (Snug and Coningham)
Submission type	Collective submission — Direction 69 / Ireneinc Report
Number of titles	[REDACTED]
Lodgement date	3/5/26
Contact people for this group	Karen Groves, [REDACTED] Tracy Harvey, [REDACTED] Katie Pickering, [REDACTED] David Taylor, [REDACTED]

To whom it may concern – Tasmanian Planning Commission,

We are a group of neighbouring landowners in the Snug locality. We have each received a letter from the Tasmanian Planning Commission (TPC) advising that the Ireneinc report has recommended a zone for our property as part of the Kingborough Local Provisions Schedule (LPS). We are lodging this collective submission to present our shared position to the Commission. Our properties share a common settlement character and landscape context, and we believe the same zone outcome is appropriate for all of them, namely the Rural Living Zone.

Please accept the following note that the attached lots are included in the rural living settlements of Snug Tiers and Snug Falls (as mentioned in multiple signed individual letters sent to the TPC) and that the undersigned coordinators are prepared to speak for them as a community in future hearings where a) they have not previously been given a chance to comment on their land nor b) have an individual representation already.

What follows is a summary of the shared characteristics of our properties and the arguments we are presenting collectively, with individual examples in submissions.

SHARED CHARACTERISTICS OF OUR PROPERTIES

Settlement pattern

Our properties form part of an established residential settlements in Snug Tiers and Snug Falls. The pattern of development includes 41 (Snug Tiers) and 29 (Snug Falls) residential lots, most of which contain a dwelling. This settlement has existed in its current form for over 100 years. The properties are aligned with the topography of the hillsides, mostly facing towards the Snug River gully, from original subdivision from large lifestyle or farming lots. Please see maps attached.

Typical lot sizes

Lot sizes in our group range from 0.18 ha to 40 ha, with the majority between 1 and 19ha. These lot sizes are consistent with Rural Living Zone (RLZ) subcategories. Please see attached maps.

Existing uses

The clear majority of the 70 lots in our group contain existing dwellings used as permanent residences, with the remainder either holding existing DAs or having future living intent. Most sites also include hobby farming, grazing, gardens, play equipment for children and outbuildings. None of the properties are used for commercial agriculture or resource extraction.

Landscape and vegetation character

Our properties contain large, cleared areas for living and a variety of bush and vegetation on the remainder. The vegetation on our titles does not include significant native vegetation that would require LCZ to protect it. The landscape character is rural residential. Any vegetation values present are already protected by overlay controls or managed by the Natural Assets Code (NAC).

Overlay controls

The following overlays apply to some or all our properties: Scenic Protection Area (SPA), Priority Vegetation Area (PVA) overlay/ Natural Assets Code (NAC), Landslip/Landslide Hazard Overlay, Waterways and Coastal Hazard Overlay and Bushfire Prone Overlay.

Proximity to existing Rural Living Zone

Several properties at [REDACTED] in our group are within the RLZ transition area recommended by Ireneinc for Snug/Coningham and our properties are indistinguishable from those in character. Other lots are adjacent to RLZ zoned parcels at [REDACTED].

SHARED ARGUMENTS

The following arguments apply to all properties listed. They are presented here as shared arguments so that the Commission can consider them once, rather than across multiple individual submissions. Each title's individual submission builds on these shared arguments with property-specific evidence.

Our properties satisfy the Zone Guidelines for the zone we are seeking

Zone Guideline RLZ 1(a) provides that the RLZ should be applied to residential areas with larger lots where the existing and intended use is a mix between residential and lower-order rural activities (such as hobby farming), and where priority is given to residential amenity.

Zone Guideline RLZ 2(b) further provides that the RLZ may be applied to land within the Environmental Living Zone (ELZ) in an interim planning scheme where the primary strategic intention is for residential use and development within a rural setting, and a similar minimum lot size is applied.

Our lands satisfy both criteria. The shared characteristics demonstrate that our lots have an established residential settlement pattern, lots of a size consistent with RLZ subcategories, and a primary use and intention that is residential.

Applying different zones to our properties would create harmful fragmentation

The Ireneinc report itself identifies avoidance of fragmented zone application as a key principle. Our properties form a coherent, contiguous group. If some of our properties receive a different zone outcome from others or are divided into multiple split zonings — the result will be a fragmented and inconsistent zone pattern. This would be contrary to the Zone Guidelines, which require that the spatial application of zones be, as far as practicable, consistent and coordinated across the LPS.

Comparable localities support the same outcome for our properties

The Tasmanian Planning Commission is required under section 34(2)(g) of the Land Use Planning and Approvals Act 1993 (LUPAA) to ensure that the spatial application of zones is, as far as practicable, consistent and coordinated. This means the Commission must consider whether our locality has been treated the same way as localities with similar characteristics elsewhere in Kingborough.

Ireneinc recommended RLZ for 110, 120, 128 and 2274 Snug Tiers Road and 59, 69 and 80 Palmers Road, and that recommendation was not challenged at the Day 2 hearing. There is no clear basis for treating our locality differently. We request that the Commission apply the same reasoning here.

The Ireneinc evaluation framework is a tool, not a legal rule

Kate Heckelmann of Ireneinc confirmed at the Day 2 TPC hearing [05:53:00] that the evaluation framework used to produce the zone recommendations is a tool, not a statutory instrument. It is not the legal test the Commission must apply. The legal test is the LPS criteria set out in section 34 of LUPAA, which include compliance with the Zone Guidelines (Guideline No. 1). The Commission is not bound by the Ireneinc framework or its outputs.

We submit that if the Commission applies the Zone Guidelines directly to the shared characteristics of our properties, it will find that RLZ is the appropriate zone. Any departure from the Ireneinc recommendation in our favour is well within the Commission's proper exercise of its statutory role.

The Commission decides on its own assessment, not on Council's position

Chair Nick Heath confirmed at the Day 2 hearing [06:45:48] that the Commission will decide this matter based on the LPS criteria set out in section 34 of LUPAA. He explicitly noted that Council's position — including its 16 March 2026 resolution favouring the 'least restrictive alternative' — is not binding on the Commission. The Commission will reach its own independent assessment based on the evidence before it, including the evidence in this submission and in each of our individual submissions.

RELEVANT COMMENTS FROM THE HEARING

As confirmed at the TPC review hearing on 14/4/26, "LCZ is not for managing vegetation—that is the role of the Natural Assets Code", which applies to all properties. Irenelnc in their report stated that for properties in our area **proposed RLZ**, overlays will likely (and logically) protect the natural values they identify.

WHAT WE ARE ASKING THE COMMISSION TO DO

We collectively request that the Commission:

- Determine that the draft Kingborough LPS should be modified to include each of the properties listed in within the Rural Living Zone (RLZ), rather than the Landscape Conservation Zone (LCZ) or other zone currently proposed for those properties.
- Have regard to the shared characteristics and shared arguments set out in this collective submission when assessing each of our individual submissions.
- Organise the hearing for our locality so that our group can present collectively as well as individually, as Chair Heath invited at the Day 2 hearing [06:55:53].

Each signatory below confirms that:

- This submission has been prepared to support individual formal written submissions to the Tasmanian Planning Commission in relation to the Kingborough Local Provisions Schedule (Direction 69).
- The information in this submission is, to the best of our knowledge, accurate.
- We are the representatives or coordinators of the locality submissions identified on this document
- I have also lodged, or will lodge by the deadline, a separate individual submission addressing my specific property.

Signatory 1 Full name: Mrs Karen Groves (ratepayer) Address: [REDACTED], Snug Tiers Title Ref: PID [REDACTED] and CT [REDACTED]	Signature: [REDACTED] Date: 3/5/26
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Signatory 2 Full name: Tracy Harvey Address: [REDACTED], Snug Tiers Title Ref: PID [REDACTED] and CT [REDACTED]	Signature: [REDACTED] Date: 3/5/26
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Signatory 3 Full name: Katie Pickering Address: [REDACTED], Snug Falls Title Ref: PID [REDACTED] and CT [REDACTED]	Signature: [REDACTED] Date: 3/5/2
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Signatory 4 Full name: David Taylor Address: [REDACTED], Snug Tiers Title Ref: PID [REDACTED] and CT [REDACTED]	Signature: [REDACTED] Date: 3/5/26
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TITLES INCLUDED IN OUR COMMUNITY

Settlement	Title address	Size (hectares)	PID	CT
Snug Tiers LCZ/RLZ		1.77	2553354	141595/3
Snug Tiers LCZ/RLZ	120 Snug Tiers Road	1.54	2553346	141595/2
Snug Tiers LCZ/RLZ	128 Snug Tiers Road	10.23	2553338	142719/1
Snug Tiers	166 Snug Tiers Road	17.01	2971900	149529/1
Snug Tiers	195 Snug Tiers Road	2.78	7754032	43030/1
Snug Tiers	281 Snug Tiers Road	2.08	7663958	29344/4
Snug Tiers	285 Snug Tiers Road	7.71	3134901	161883/1
Snug Tiers	307 Snug Tiers Road	3.27	1969200	133409/1
Snug Tiers	315 Snug Tiers Road	5.96	3343914	133409/1
Snug Tiers	365 Snug Tiers Road	8.05	3343906	133409/2
Snug Tiers	375 Snug Tiers Road	2	5793863	9978/1
Snug Tiers	390 Snug Tiers Road	6.7	9010354	204216/1
Snug Tiers	400 Snug Tiers Road	20.7	7373192	244509/1
Snug Tiers	440 Snug Tiers Road	5.72	5793900	109784/3
Snug Tiers	449 Snug Tiers Road	5.95	7517643	109784/1
Snug Tiers	470 Snug Tiers Road	7.55 0.52	3559141	109252/1 24677/1
Snug Tiers	508 Snug Tiers Road	6.28	7496192	252540/1
Snug Tiers	510 Snug Tiers Road	16.43	7496205	33264/1
Snug Tiers	511 Snug Tiers Road	8.85	3417186	109253/1
Snug Tiers	512 Snug Tiers Road	29.89	7496184	33799/1
Snug Tiers	540 Snug Tiers Road	9.84 10.89	7275234	203184/1 212530/1
Snug Tiers	18 McQueen's Road	3.31	2718569	147255/1

Settlement	Title address	Size (hectares)	PID	CT
Snug Tiers	25 McQueen's Road	4.54	7136939	21294/1
Snug Tiers	28 McQueen's Road *	14.26	2718577	147255/2
Snug Tiers	37 McQueen's Road	1.83	5793986	71709/1
Snug Tiers	39 McQueen's Road	6.43	5794006	68888/1
Snug Tiers	61 McQueen's Road	3.91	5793994	57388/1
Snug Tiers	77 McQueen's Road	2.88	5794014	220852/1
Snug Tiers	80 McQueen's Road	13.1	5794022	217146/1
Snug Tiers	P 915 McQueen's Road	16.18	5793847	238002/1
Snug Tiers	4 Sproules Road	2	3371552	169008/1
Snug Tiers	10 Sproules Road	17.91	3371560	169008/2
Snug Tiers	17 Sproules Road	0.18 1.96 1.85	7847036	50032/2 105088/2 105087/1
Snug Tiers	28 Sproules Road	7.62	2613062	139424/1
Snug Tiers	Lot 1/33 Sproules Road	0.45	9001239	28791/2
Snug Tiers	33 Sproules Road	3.48	9001238	28791/1
Snug Tiers	36 Sproules Road	1.17	2666201	139429/1
Snug Tiers	49 Sproules Road	3.77	7808627	29344/3
Snug Tiers	52 Sproules Road	0.67	2854819	151056/1
Snug Tiers	69 Sproules Road	8.05	7808643	29280/1
Snug Tiers	76 Sproules Road	4.98	9010355	239172/1
Snug Falls	35 Snug Falls Road	0.96	3248319	166263/1
Snug Falls	57 Snug Falls Road	10.77	5793441	112014/1
Snug Falls	130 Snug Falls Road	11.73	7449900	26744/5
Snug Falls	230 Snug Falls Road *	28.19	5793484	213043/1

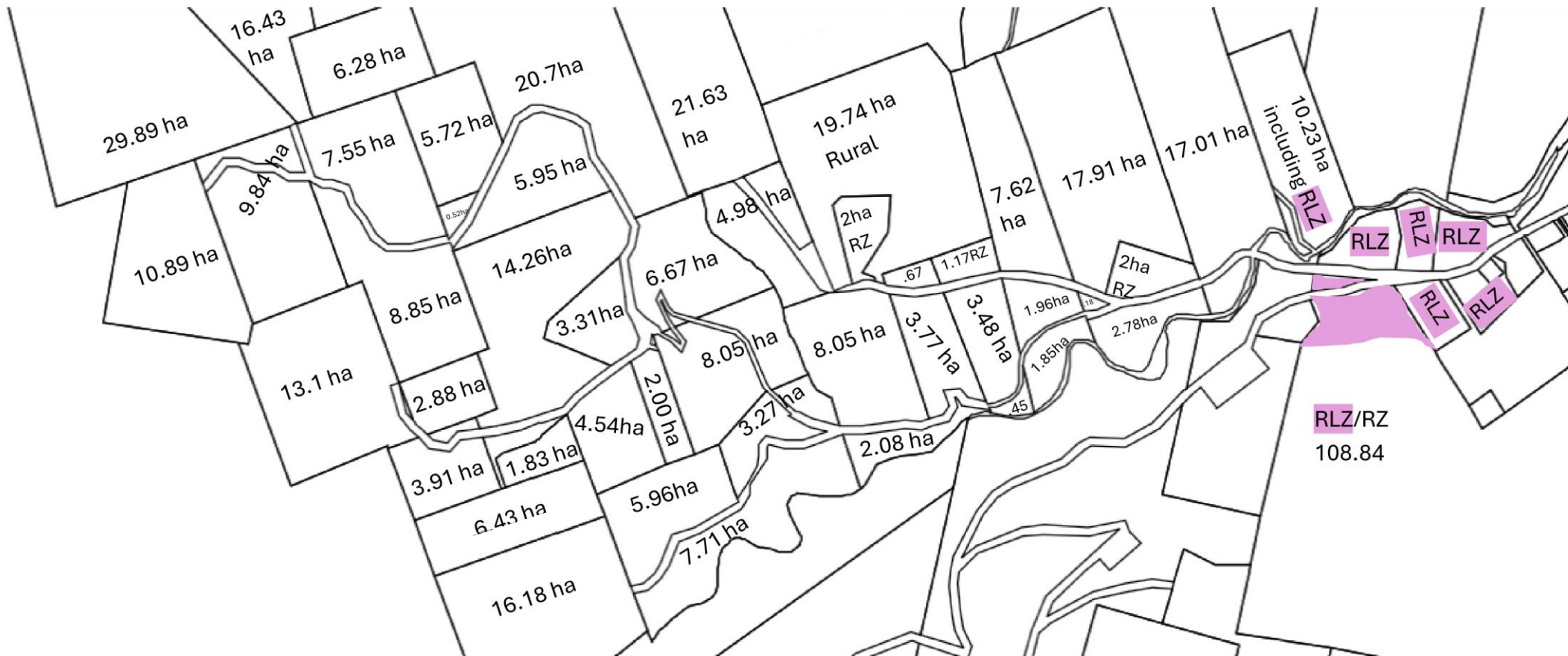
Settlement	Title address	Size (hectares)	PID	CT
Snug Falls	330 Snug Falls Road	8.77 10.11	9920048	175636/1 244845/1
Snug Falls	345 Snug Falls Road *	40.76	2186902	48505/2
Snug Falls	350 Snug Falls Road	6.58	7883248	102359/1
Snug Falls	350 Snug Falls Road	20.41	7883248	233927/1
Snug Falls	359 Snug Falls Road	2.26	2810840	152344/1
Snug Falls	376 Snug Falls Road	6.61	9482043	185894/1
Snug Falls	403 Snug Falls Road	29.19	2869156	220339/1
Snug Falls	461 Snug Falls Road	31.31	5793556	106760/2
Snug Falls	501 Snug Falls Road	35.65	9407757	106760/1
Snug Falls	501 Snug Falls Road	36.81	9407757	232753/1
Snug Falls	P 905 Snug Falls Road	15.17ha	5793564	245452/1
Snug Falls	Lot 3 Snug Falls Road	38.02	2186910	48505/3
Snug Falls	43 O'Briens Road	12.8	7449919	53349/3
Snug Falls	101 O'Briens Road	39.51	7647704	207212/1
Snug Falls	101 O'Briens Road	6.2	7647704	203966/1
Snug Falls	105 O'Briens Road	3.33	7449943	26744/4
Snug Falls	109 O'Briens Road	39.34	5791040	53130/1
Snug Falls	110 O'Briens Road	11.55	7449927	26744/2
Snug Falls	55 Palmers Rd	5.29	3424124	117539/1
Snug Falls	55 Palmers Rd	2.48	3424124	228418/1
Snug Falls	57 Palmers Rd	0.61	3214418	11651/2
Snug Falls	61 Palmers Rd	18.95	3212930	117538/1
Snug Falls	81 Palmers Rd	5.87	5790064	174276/2

Settlement	Title address	Size (hectares)	PID	CT
Snug Falls	95 Palmers Rd	4.49	5790080	242053/1
Snug Falls	105 Palmers Rd	8.32	9714042	178431/1
Snug Falls	106 Palmers Road	24	1443743	48505/7
Snug Falls	107 Palmers Road	23.08	9812352	178431/2

* These titles currently also have representations into the TPC for the Kingborough LPS process:

[REDACTED] Representation #92 and #433
 [REDACTED] – Representation #122
 [REDACTED] – Representation #370
 [REDACTED] – Representation #114, #155 and #296

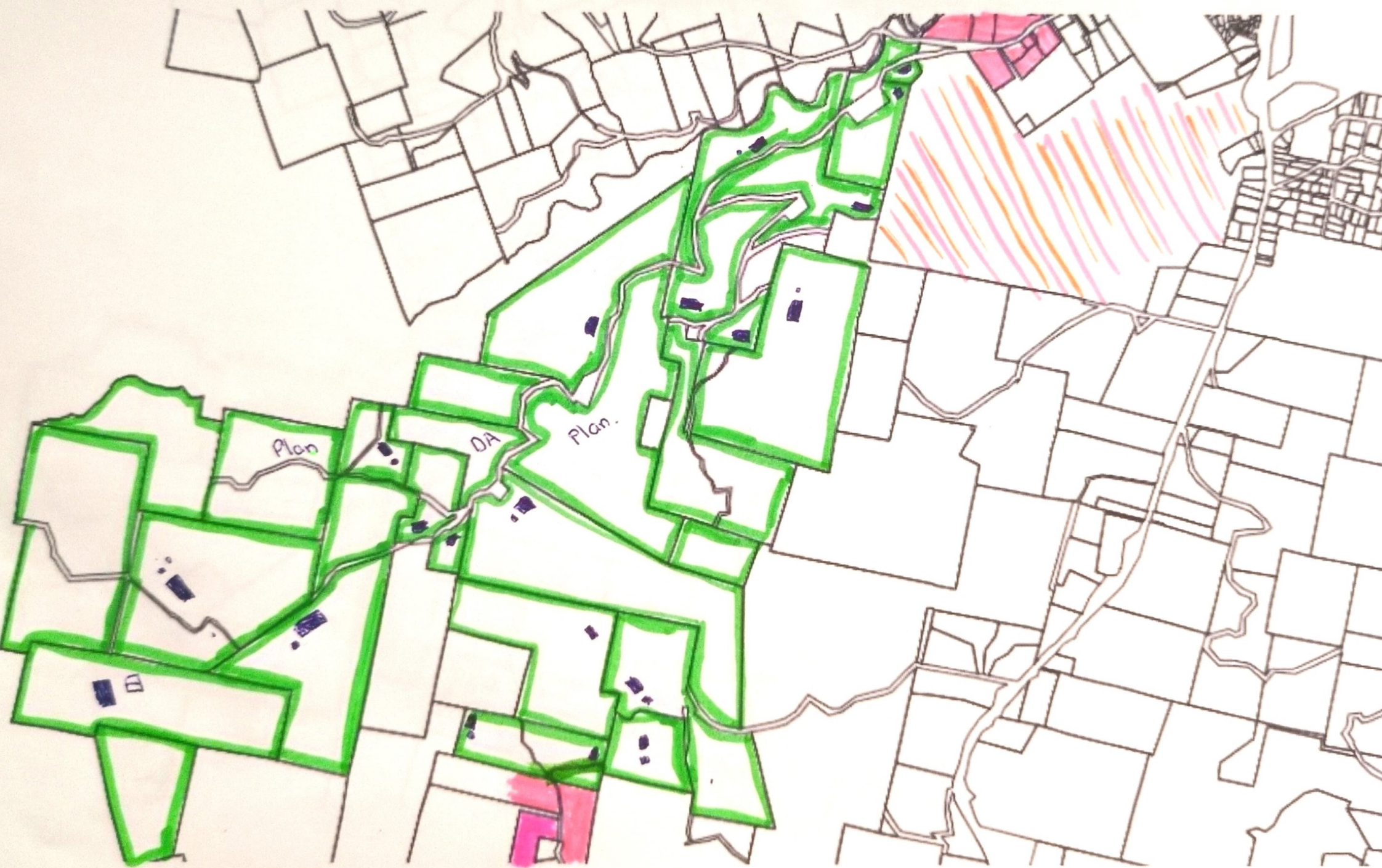
** Note: Many titles in this settlement area are co-representators on Representation #198 by Jacob and Nathaniel Elcock or witnesses to Representation #430 by Joshua Graeme-Evans

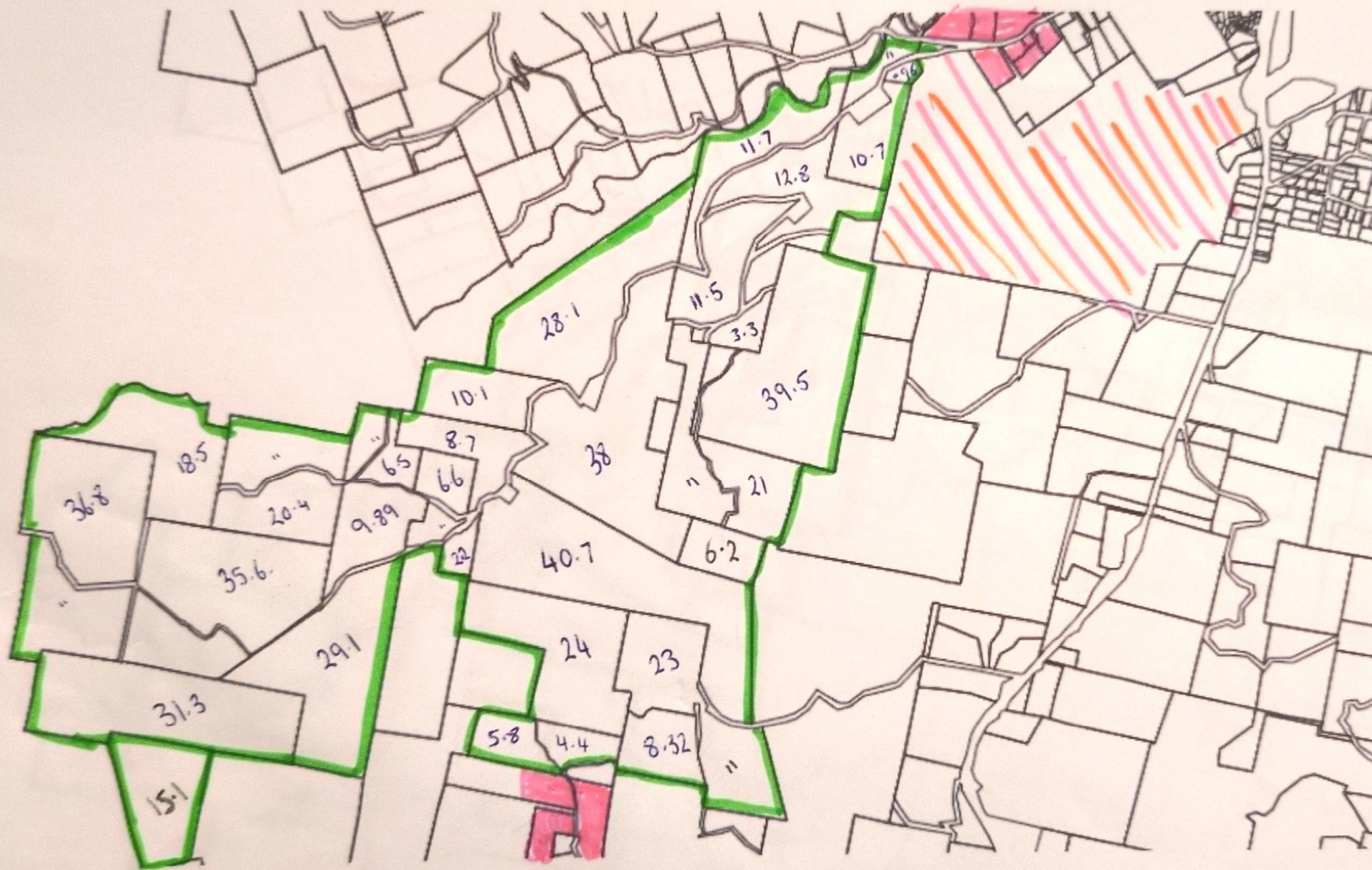


SNUG TIERS SETTLEMENT - LOT SIZE



SNUG TIERS RURAL LIVING STRATEGIC INTENT





SNUG FALLS