From: Clarence City Council
Sent: Monday, 31 August 2026 10:03 AM
To: City Planning
Subject: FW: Building Tasmania Response to PSPPAMEND-2022-028417 2 Piper Road, Geilston Bay 647 and 657 East Derwent Highway expansion to the Clarence Lifestyle Village
Attachments: Building Tasmania Response to PSPPAMEND-2022-028417 2 Piper Road, Geilston ~ 657 East Derwent Highway expansion to the Clarence Lifestyle Village - PDF.PDF; Response to Request for Crown Landowner Consent - Craig Swan - 647, 657 East Derwent Highway & 2 Piper Road - FINAL.PDF

Regards

Cheryl Gangell
Customer Contact Officer
City of Clarence
a 38 Bligh Street | PO Box 96 Rosny Park TAS 7018
p 03 6217 9538
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Clarence City Council pays respect to all First Peoples, including the Mumirimina (mu mee ree mee nah) People of the Oyster Bay Nation whose unceded lands, skies, and waterways we are privileged to conduct our business on. We pay respect to, and value the deep knowledge of Elders past and present, and we acknowledge the survival and deep spiritual connection of the Tasmanian Aboriginal People to their Country, a connection which has endured since the beginning of time. Our work reflects our ongoing commitment to truth-telling and respectful understanding.

From: Smith, Pete [redacted]
Sent: Monday, 31 August 2026 9:52 AM
To: Clarence City Council <clarence@ccc.tas.gov.au>
Cc: Armstrong, Claire [redacted]; Dawson, John K. [redacted]
Subject: Building Tasmania Response to PSPPAMEND-2022-028417 2 Piper Road, Geilston Bay 647 and 657 East Derwent Highway expansion to the Clarence Lifestyle Village

This Message Is From an External Sender
This message came from outside your organization.

Good morning

Please find attached Building Tasmania's submission/representation and landowner consent in respect to this matter.

Regards

Pete

Pete Smith (He/Him/His)
Acting Director, Housing and Strategic Planning
Building Tasmania I Level 6, Parliament Square, Hobart TAS 7000
GPO Box 536, Hobart TAS 7001 [redacted]
[redacted]

Please note that on 2 July 2026 we became part of Building Tasmania and our emails addresses changed accordingly.

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Building Tasmania

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Tasmanian Government

Our Ref: D26/25034/ Your Ref: PDPSPAMEND 2022/028417

City of Clarence
clarence@ccc.tas.gov.au

Planning Scheme Amendment and Permit Application –
2 Piper Road, Geilston Bay and 647 East Derwent Highway, Risdon

Thank you for the opportunity to comment on the draft planning scheme amendment and combined development application at the 'Clarence Lifestyle Village' at Risdon.

The application proposes to:

- Rezone the land to a new Particular Purpose Zone – Clarence Lifestyle Village (PPZ)
- Construct 54 new retirement village units, lot consolidation and other related works.

It is noted that the draft PPZ is proposed to apply to both the existing Clarence Lifestyle Village site, which has 111 retirement village units, and the adjoining site, where it will allow for the expansion of the village.

I confirm that Building Tasmania has reviewed the supporting information and makes the following comments in respect to this application.

Strategic context

Building Tasmania supports the development of new housing stock, as it meets a need, however it is also important that housing is well located and accessible. The demand for retirement housing is also noted.

The draft amendment and combined application provide for the expansion of the existing retirement village which is not ideally located in relation to essential community infrastructure, public and active transport. It is expected that these constraints should be balanced against the need for housing and the potential opportunity provided through the current application to improve accessibility of existing and potential future residents.

Pedestrian Safety

Building Tasmania has previously raised concerns with council about the safety of older residents and other pedestrians from the village accessing bus stops near to the site, particularly the south-bound bus stop on the opposite side of the East Derwent Highway. This section of the highway is a busy dual carriageway and does not have safe pedestrian crossing facilities.

Building Tasmania has received numerous complaints, from existing Village residents regarding the unsafe and high-risk access to these bus stops and is concerned the Village expansion will exacerbate these safety concerns.

Building Tasmania has recommended a pedestrian footpath be constructed along the highway to allow safe access to the bus stops within the lower 70 kilometre per hour speed limit zone to the north (particularly the south-bound stop), as part of the proposed expansion of the village.

The application documents indicate that the pedestrian footpath is not proposed to be pursued as part of the current application but that the developer is willing to contribute to the future

development of a pathway. The Traffic Impact Assessment (TIA) has not addressed how existing and future residents can safely access public transport services.

Building Tasmania strongly recommends the installation of an appropriate pathway should be installed as part of the development or as a minimum, that their contribution to the pathway be required as a condition of the approval. Building Tasmania would be happy to discuss this further with the developer and Council, including design, permit and future maintenance requirements.

Private shuttle bus and public transport

The TIA states that the village operates a minibus to provide residents access to Rosny and Glenorchy. The TIA does not indicate the current frequency of this service or the proposed increase in frequency based on the proposed expansion of the site. While the provision of a minibus partly provides an alternative to public transport, accessibility is still limited.

It is important to note that Building Tasmania has no plans to deviate existing public transport options into the site, any deviation into the site is contrary to the department's network planning principles for having simple and direct routes to ensure passengers have quicker travel times.

Future road link

Building Tasmania encourages Council to ensure the connection between Napier Street and Dumbarton Drive is constructed as soon as possible. This will minimise traffic utilising the existing Piper Road intersection with the East Derwent Highway.

This connection effectively provides an option for safe vehicle and pedestrian access from the village expansion to the traffic signals that were installed on the East Derwent Highway at the Dumbarton Drive / Clinton Road intersection, as well as future proof any potential public transport link away from the highway.

Stormwater impact and infrastructure

Crown Landowner Consent advice (see attached) requested pre-development and post-development flood mapping for the one percent Annual Exceedance Probability (1% AEP) storm event be provided to identify any impacts upon the State highway reservation.

The Flood Hazard Report prepared by Rare does not include a post-development flood map or provide any comment on impact to the state highway reservation. The report focuses on the impacts to the proposed development.

It is not clear whether the stormwater analysis undertaken by JSA and Flussig has considered the through flows from the upstream catchments (the two overland flows path through the development site); noting that these upstream flows are directed towards the two proposed detention basins within the existing north-eastern drainage course. Rare has not done any checks/calculations on the design as part of the report.

The two detention basins within the north-eastern drainage course have been designed for the 1% AEP storm event, however this may be based solely on the increase in stormwater discharge as a result of the development (non-impervious to pervious area increase) and does not consider the redirected flow to the north-eastern drainage course from the existing minor swale that passes through the development site from the west. These detention basins may be undersized.

Additionally, these detention basins are located within the existing north-eastern drainage course, thus effectively acting as check dams for through flows from the upstream catchment. There does not appear to have been any analysis regarding this.

Building Tasmania recommends the advice on the Crown Landowner Consent be included as a condition on any permit issued.

Access to East Derwent Highway

The application proposes to consolidate 647 East Derwent Highway (folio of the Register 115696/1) and 2 Piper Road (folio of the Register 226109/1) into a single lot.

Building Tasmania supports this consolidation (rather than an adhesion).

The East Derwent Highway is a Limited Access Road under the *Roads and Jetties Act 1935*. The existing access licence and rights-of-way on the titles will no longer be relevant once the titles are consolidated and the site is developed, noting that vehicular access to and from the East Derwent Highway to the site will not be permitted for the changed/intensified use.

Building Tasmania recommends the advice on the relating to the access on the Crown Landowner Consent be included as a condition on any permit issued.

Building Tasmania previously advised the applicant that a proposed emergency vehicle exit via the East Derwent Highway was not supported. Building Tasmania does not generally permit emergency accesses as they tend to be misused. In case of emergency, any means of access to the state road network may be used, including via another property access.

The applicant removed the proposed emergency exit from the proposal plan; however, it appears the emergency exit is still referenced in the Bushfire Hazard Management Report.

Noise impact from the Highway

The recommendations of the noise impact assessment to require sound mitigation measures for each dwelling are supported, as well as the inclusion of a provision in the proposed specific area plan to require assessment of the noise impacts on dwellings outside the road or railway attenuation area.

Building Tasmania notes that under the Tasmanian Traffic Noise Management Guidelines, the department will not provide noise mitigation due to land use change, or increased traffic or population growth.

Thank you for referring this application to Building Tasmania for our review. Please contact Claire Armstrong by email at planningpolicy@stategrowth.tas.gov.au or 6166 4484 if you have any questions in relation to this representation or if you require further information.

Yours sincerely



Pete Smith
Acting Director
Housing and Strategic Planning

31 August 2026

Attachment:

Crown Landowner Consent Granted – 647, 657 East Derwent Highway and 2 Piper Road

Department of State Growth

Salamanca Building Parliament Square
4 Salamanca Place, Hobart TAS
GPO Box 536, Hobart TAS 7001 Australia
Email permits@stategrowth.tas.gov.au Web www.stategrowth.tas.gov.au
Ref: SRA-23-770

Tasmanian Government

Craig Swan
Clarence Lifestyle Village Pty Ltd
By email: [redacted]

Dear Craig

Crown Landowner Consent Granted – 647, 657 East Derwent Highway and 2 Piper Road

I refer to your recent request for Crown landowner consent relating to the development application at 647, 657 East Derwent Highway & 2 Piper Road for Sewer, water, and stormwater infrastructure.

I, Fiona McLeod, Manager Asset Management, State Roads, the Department of State Growth, having been duly authorised by the Minister for Infrastructure under section 43D(1) of the former provisions of the *Land Use Planning and Approvals Act 1993*, hereby give my consent to the making of the application, insofar as it affects the State road network and any Crown land under the jurisdiction of this Department.

The consent given by this letter is for the making of the application only insofar as that it impacts Department of State Growth administered Crown land and is with reference to your application dated 7 November 2023, and the approved documents, as accessible via the link below:

https://files.stategrowth.tas.gov.au/index.php/s/Ub2tvJ5rzBlWxEP

A copy of the Instrument of Authorisation from the Minister authorising the delegate to sign under section 43D(1) of the Act can also be accessed via the above link.

Please access and download these documents for your records as soon as possible as this link will expire six months from the date of this letter.

In giving consent to lodge the subject development application, the Department notes the following applicable advice:

- This consent relates only to stormwater.
- The lands in Folio of the Register 115696/1 (currently 647 East Derwent Highway, Risdon) and Folio of the Register 226109/1 (2 Piper Road, Geilston Bay) and are to be consolidated and shown as a single lot on the final plan/new title plan. Adhesion will not be accepted.
- The benefitting rights-of-way for FR 115696/1 over both FR 61125/1 (647 East Derwent Highway, Risdon) and FR 197369/1 (659 East Derwent Highway, Risdon) are to be expunged.
- Any access licence issued or provided for under provisions of the *Roads and Jetties Act 1935* in relation to the lands in FR 115696/1 must be surrendered to the Department of State Growth.
- It has been acknowledged in writing, by the applicant/developer, that the emergency exit no longer forms part of the proposal. Any references to the emergency exit should be removed from the other documentation prepared in support of the proposal.

- **Discharge of Stormwater or drainage into the State road drainage system (Ministerial consent required)**

  In giving consent to lodge the subject development application, the Department notes that the works in the State road network will require the following additional consent:

  The consent of the Minister under Section 17B of the *Roads and Jetties Act 1935* to concentrate and discharge drainage to the State road reserve.

  The proponent must submit a drainage plan, including catchment area, flows and drainage design for any area discharging to the State road reserve.

  If any enlargement of the existing State road drainage infrastructure is required in order to carry any additional drainage, these works must be undertaken under the supervision and to the satisfaction of an officer designated by the Minister. If such works are required, the costs associated with the works will be payable by the proponent.

  The proponent is responsible for the ongoing maintenance of their own infrastructure.

  The proponent is to provide further detailed hydraulic modelling analysis which accounts for the two overland flow paths through the development and their impact on the resulting Development's site stormwater discharge to the State Highway Drainage System.

  Pre and post development flood mapping for the 1% AEP is also to be provided, which are to identify any impacts upon the State Highway Reservation

  For further information please contact Road Assets at roadassets.utilities@stategrowth.tas.gov.au.

The Department reserves the right to make a representation to the relevant Council in relation to any aspect of the proposed development relating to its road network and/or property.

Yours sincerely

[redacted]

Fiona McLeod
DIRECTOR ASSET MANAGEMENT

Delegate for the Minister administering the *Roads and Jetties Act 1935*

20 December 2024

cc: General Manager, Clarence City Council