
From: Norris, Jane <[REDACTED]>
Sent: Friday, 24 April 2026 4:09 PM
To: Kingborough LPS
Subject: Submission - Kingborough LPS Direction 69 - [REDACTED] [SEC=UNOFFICIAL]

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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 and that representation has been heard by the Commission. I understand that by this letter the Commission is providing me with the opportunity to make a further written submission in relation to the Ireneinc report recommendations. I take up that opportunity and submit as follows.

Landowner name(s)	Jane and Stuart NORRIS
Property address	[REDACTED]
Title reference (folio)	[REDACTED]
Lot size (approx.)	1.90ha
Locality	Blackmans Bay
Current IPS zone	Environmental Living Zone (ELZ)
Draft LPS exhibited zone	Landscape Conservation Zone (LCZ)
Ireneinc recommended zone	Rural Living Zone (RLZ) - Subcategory A
Position in this submission	Accept RLZ

I welcome and support the Ireneinc recommendation that my property be included within the RLZ under the draft Kingborough LPS. The RLZ is a significantly more appropriate zone for my property than the exhibited LCZ.

I make this submission to:

- (1) provide the Commission with property-specific evidence supporting the RLZ recommendation,
- (2) identify the most appropriate RLZ subcategory for my property, and
- (3) ensure the Commission does not revert to LCZ at the final determination stage.

The subcategory I seek for my property is:

- Rural Living Zone A (minimum lot size 1 ha) - the existing lot pattern in my locality is consistent with lots of approximately 1–2 ha

The property contains a dwelling constructed in 1993, with an associated workshop/garage, and has been used primarily for residential purposes since that time. In addition to the residence, the land supports hobby animals, a small orchard, a vegetable garden, and associated domestic landscaping and outdoor living improvements. This combination of residential use with low-intensity rural activities aligns directly with the description of Rural Living Zone (RLZ) 1(a).

The property has an area of 1.9 hectares, which is consistent with the RLZ A minimum lot size of 1 hectare and does not create subdivision potential. The longstanding strategic intention for the land has always been residential, reflecting its continuous use as a residence since 1993.

The Ireneinc Locality Report for Howden and Blackmans Bay identifies the area as Low-Density Residential and Rural Living Zone land. Properties in the immediate locality generally range from approximately 1 to 5 hectares in size, and the subject property fits comfortably within this established pattern. The land forms part of a broader rural residential settlement along [REDACTED], characterised by existing dwellings with associated outbuildings on similar lot sizes. The property forms part of an established rural residential area and was purchased in 1989.

The Ireneinc Locality Report also confirms the transition to the RLZ, noting that the area exhibits attributes consistent with rural living settlements and is located within proximity to other RLZ land. Taken together, the existing overlay controls and the RLZ minimum lot size provide sufficient protection of landscape values, removing the need for application of the Landscape Conservation Zone (LCZ). There is no intention to subdivide the land, and any potential lot pattern would remain consistent with surrounding properties.

While I support the RLZ recommendation, I am concerned that the Commission may nevertheless revert to the LCZ rather than adopting Ireneinc's site-specific recommendation. I place the following matters on the record.

- The Ireneinc LCZ Review documents that the TPC found Council's initial LCZ application was often inconsistent with the Zone Guidelines and with surrounding land. The exhibited LCZ for my property was part of a blanket application covering approximately 75% of ELZ parcels - an approach the TPC itself queried repeatedly. Ireneinc's recommendation to apply RLZ to my property is the product of a more rigorous, property-level analysis that should be preferred over the exhibited LCZ.
- Chair Nick Heath confirmed at Day 20 [06:45:48] that the Commission will decide on section 34 LUPAA criteria and is not bound by Council's exhibited position or by Council's 16 March 2026 resolution favouring the 'least restrictive alternative'. The Commission is therefore free to adopt the RLZ recommendation, and I urge it to do so.
- Kate Heckelmann (Ireneinc) confirmed at Day 20 [05:53:00] that the evaluation framework is a tool, not a statutory instrument. The Commission may adopt, modify, or depart from Ireneinc's recommendations as it sees fit under section 34 LUPAA - but where Ireneinc's analysis supports RLZ and is consistent with the Zone Guidelines, as here, the Commission should adopt it.

For the reasons set out above, I submit that:

1. The Ireneinc recommendation to include my property within the RLZ is correct and is consistent with the Zone Guidelines (Guideline No. 1) and the requirements of section 34 of LUPAA.
2. The exhibited LCZ was not appropriate for my property and should not be reinstated. The RLZ recommendation reflects a more rigorous analysis and should be adopted.
3. The most appropriate RLZ subcategory for my property is RLZ A which reflects the existing pattern and density of development in my locality under Zone Guideline RLZ 3 and significantly constrains further subdivision.

4. Any landscape values in the broader locality can be appropriately managed through existing overlay controls, including the Natural Assets Code, Priority Vegetation Area overlay, and Scenic Protection Code, in combination with the minimum lot size controls of the Rural Living Zone subcategory.

I respectfully request that the Commission:

- Adopt the Ireneinc recommendation and include my property within the RLZ A in the Kingborough Local Provisions Schedule; and
- Not revert to the exhibited LCZ, which is not supported by the site-specific evidence for my property.

I request that the folio of the Register [REDACTED] at [REDACTED], Blackmans Bay, be included within the Rural Living Zone A in the Kingborough Local Provisions Schedule, consistent with the Ireneinc recommendation.

Jane Norris
[REDACTED]

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