



MC Planners Ref: 24111

23rd September 2026

Tasmanian Planning Commission

Via email - tpc@planning.tas.gov.au

Attention: Karen Fyfe and Delegates

Dear Delegates

**PRE-HEARING SUBMISSION - COMBINED AMENDMENT AND SUBDIVISION APPLICATION
- PDPSAMEND-2024/048902 - 471 CAMBRIDGE ROAD, MORNINGTON, AND 528 & 540
PASS ROAD, CAMBRIDGE**

The following submission is provided in response to directions dated 20 August and 16 September 2026.

In support of the submission, the following document is attached:

- Attachment 1 - Traffic Statement

Directions dated 20 August 2026

- 1. The planning authority is to provide a submission to the Commission outlining how the draft amendment satisfies the relevant criteria in the Tasmanian Planning Policies, including the policies associated with industrial land.***

The Tasmanian Planning Policies came into effect on 1 July 2026 and were not in force when the amendment was certified by the planning authority on 13 May 2026.

A response to the relevant policies is provided below.

Consideration of the Tasmanian Planning Policies

Criteria	Assessment
<i>1.1.2 Growth - To plan for settlement growth that allocates land to meet the existing and future needs of the community and to deliver a sustainable pattern of development.</i>	The proposal provides for logical settlement growth and delivers a strategically located regional park and local activity centre. The proposal assists in meeting the demand for residential land as detailed at section 13 of the Planning Report.



<i>1.2.2 Liveability - To improve the liveability of settlements by promoting a pattern of development that improves access to housing, education, employment, recreation, nature, health and other services that support the wellbeing of the community.</i>	The site provides for well-located housing close to substantial employment and service centres including the Clarence Primary Activity Centre and industrial land in Mornington. Several schools serve the area. The SAP provides for an elevated streetscape design standard, walkable connections, local services and a regional park, all contributing to an improved level of liveability.
<i>1.3.2 Social Infrastructure - To support the provision of adequate, accessible and inclusive social infrastructure to promote the health, education, safety and wellbeing of the community.</i>	The site benefits from proximity to existing social infrastructure. The proposal provides for increased residential density to maximise the utility of that infrastructure and provides for further services opportunities in the Local Business zone area.
<i>1.4.2 Settlement types - To plan for the sustainable use and development of settlements that have particular characteristics or values.</i>	The proposal supports sustainable development by optimising the provision of higher density housing surrounding a strategically located regional park facility.
<i>1.5.2 Housing - To provide for a sufficient supply of diverse housing stock, including social and affordable housing, that is well-located and well-serviced to meet the existing and future needs of Tasmanians.</i>	The site is strategically located at the junction of two collector roads and is capable of being fully serviced. The SAP provides for a range of lot types supporting increased housing diversity, ranging from multiple dwellings and villa style dwellings on small lots, to standard suburban development. This supports housing affordability as detailed in response to Direction 2 below.
<i>1.6.2 Design - To create functional, connected and safe urban spaces that positively contribute to the amenity, sense of place and enjoyment experienced by the community.</i>	The SAP includes provisions specifically mandating an elevated level of design to provide a high quality streetscape connecting to a regional park facility. The upper areas of the site are also connected to the park through pedestrian laneways through the urban block structure linking potential hilltop open space corridors to the regional park.
<i>2.1.2 Biodiversity - To contribute to the protection and conservation of Tasmania's biodiversity.</i>	The site is not within a Priority vegetation overlay and the Natural Values Assessment (NVA) (Appendix H of the Planning Report) concludes that the vegetation on the site is degraded and does not support any threatened flora or fauna species.
<i>2.2.2 Waterways, wetlands and estuaries - To protect and improve the quality of Tasmania's waterways, wetlands and estuaries.</i>	The NVA concludes that the creek line is degraded and contains no intact native vegetation; however, the Waterway and Coastal Protection Area overlay is to be retained and the Natural Assets Code will govern any future development within the overlay under Council's decision, contrary to the applicant's proposal. Part of the overlay area of the overlay is within the proposed regional park, providing opportunity for future

	rehabilitation, but other areas are proposed to be urban development. Our view is the overlay does not serve any function as the drainage line has been replaced by a piped stormwater drainage/detention system.
<i>3.1.2 Bushfires - To prioritise the protection of human life and to support the resilience of settlements and communities by reducing the potential impacts of bushfire on life, property and infrastructure.</i>	The proposal is supported by a Bushfire Hazard Management Report (Appendix D of the Planning Report), which concludes that the combined subdivision meets the Bushfire-Prone Areas Code requirements. Under the application future subdivision would be appropriately governed under the code, however the Council version of the SAP has additional control under CLA-SXXX.8.1 Outline Development Plan.
<i>3.2.2 Landslip - To reduce the risk of harm to human life, property and infrastructure from the adverse impacts of landslip hazards.</i>	The proposal is supported by a Geotechnical Report (Appendix I of the Planning Report), which concludes that the envisaged development will not cause or contribute to landslide on the site, adjacent land, or on public infrastructure, subject to specific recommendations. Future development within the Landslip hazard overlay will be appropriately governed under the associated code, providing opportunity for conditioning of permits with the relevant recommendations.
<i>3.3.2 Flooding - To minimise the impact of flood hazards that have the potential to cause harm to human life, property and infrastructure and to reduce the cost to the community as a result of flood events.</i>	Flood impacts will be controlled through on-site detention and water quality treatment supporting the proposed subdivision (Appendices F and R of the Planning Report). Future development will be subject to the Flood-Prone Areas Hazard Code.
<i>4.4.2 - Tourism - To promote the sustainable development of the State's tourism industry.</i>	The proposed SAP allows for a limited range of Visitor Accommodation types but only within the Local Business zone. This is a deliberate choice by the applicant to encourage home owner/occupiers.
<i>4.6.2 Industry - To protect industrial land, facilitate sustainable industrial use and development and ensure there is sufficient availability of suitable industrial land to meet the existing and future needs of Tasmania.</i> <i>4.6.3 - 5. Promote the protection of existing and future industrial land by preventing encroachment from incompatible use and development.</i> <i>4.6.3 - 6. Where appropriate, protect land surrounding industrial estates by designating it for a compatible land use that does not prejudice the future availability of that land for industrial use and development.</i>	No rezoning of industrial land is proposed and the proposal does not impact on the supply of industrial land. The site is protected from nearby industrial land by an existing buffer of land in the Rural Living and Open Space zones, and an Electricity transmission infrastructure protection overlay which precludes substantial development. The proposed rezoning will not fetter the use of the existing industrial land at Morningson Road, noting that the site is no closer to these uses than existing suburban dwellings at Bonnet Place and Joshua Street in Morningson. The site also benefits from a vegetated buffer area, and is shielded from the industrial uses by the local topography. A supporting Noise Assessment

	(Appendix N of the Planning Report) demonstrates there would be no specific siting or construction requirements for future dwellings.
<i>4.7.2 Business and Commercial - To promote business and commercial activities at a scale and intensity suited to the location to support diverse economic and employment opportunities and strengthen the State's economy.</i>	The proposal includes land identified for a local activity centre, supported by associated residential land.
<i>5.1.2 Provision of services - To promote the efficient, effective, sustainable and safe delivery of services including reticulated water and sewerage, stormwater management, electricity, gas, telecommunications and recycling and waste management.</i>	The site is capable of being fully serviced, as detailed in Appendices F and R of the Planning Report.
<i>5.3.2 Roads - To plan, manage and maintain an integrated road network that supports efficiency, connectivity, travel reliability and safety.</i>	The proposed SAP establishes the road layout for future development of the site. A Traffic Impact Assessment (TIA) (Appendix G of the Planning Report) concludes that the proposed road network and the traffic generated by future development of the site in accordance with the SAP are not expected to create any adverse safety, amenity, or traffic efficiency problems.
<i>5.4.2 Passenger transport modes - To support a safe, reliable, efficient and accessible passenger transport system that provides people with modal choice and is well integrated with land use.</i>	The area is well served by public transport, which provides linkages across the Principal Activity Centres of Hobart City and Rosny Park.
<i>7.2.2 Strategic Planning - To encourage the strategic consideration of land use planning issues by promoting integrated and coordinated responses that balance competing social, economic, environmental and inter-generational interests to provide for the long-term sustainable use and development of land.</i>	The site is considered in the Regional Land Use Strategy and is within the Urban Growth Boundary.

2. The planning authority is to provide a submission to the Commission outlining how the draft amendment satisfies section 32(4) of the Land Use Planning and Approvals Act 1993.

The Commission seeks detailed information on what:

- **significant social, economic or environmental benefit to the state, a regional or a municipal area; or**
- **particular environmental, economic, social or spatial qualities the land has, and why those particular qualities require provisions in the planning instrument that are unique to that area of land.**

The proposal is considered to meet both s32(4)(a) and (b) under LUPAA. This is addressed in Section 4.1.1 of the Planning Report (page 29). The relevant sections of Section 32 are addressed in further detail below:

s32(4)(a): a use or development to which the provision relates is of significant social, economic or environmental benefit to the State, a region or a municipal area;

The legislative test under this provision requires only that the provision *relates to* use or development that is of significant benefit. The test does not require that the provision *is necessary* to enable that use or development. Nevertheless, the proposed variation from the SPPs achieves the anticipated benefits as outlined below.

The Planning Report for the application states:

The amendment is providing use and development that is a significant social benefit to the municipal area under 4(a). The development of a regional-level park on the site is a significant social benefit as is the provision of affordable housing models. The development of 112 affordable houses will have a significant social benefit to the municipality. Whilst the construction of dwellings will have an economic benefit, this is not likely to be of municipal significance. Accordingly, 4(a) is met in our view.

Both the regional park and housing, to which the proposed SAP relates, deliver social benefits at the municipal level.

The provision of public open space is governed by Council's Public Open Space Policy¹ under the *Local Government (Buildings and Miscellaneous Provisions) Act 1993* (LGBMP). Council has sought to purchase land at the site for the purpose of creating a regional park (Mornington Park), with the purchase being endorsed by Council.

While the SPPs do not directly mandate public open space, LGBMP Act ties its provision to subdivision. Under the Act, subdivision approved under the TPS is required to deliver up to 5% of the subdivision land area or cash in lieu for public open space. The site area is 5.756ha, while the area of public open space mandated by the SAP is 5,000m², equating to 9% of the area to be subdivided. This aligns with Council's intention to develop a regional park on the land and represents a significant increase over the area (or value) that would be mandated in the absence of the SAP. The park area mandated by the SAP is intended by Council to form a valuable addition as a node in the municipal network of public open space.

While Council's Open Space Strategy is currently in development, the associated Discussion Paper² prompts consideration of the trade-off between small pocket parks and larger, connected open spaces, with a focus on ensuring equitable access. Mornington Park, as facilitated through the SAP, would serve a substantial area of suburban Mornington that is separated from public open space other than small, underdeveloped pocket parks, by major roads (Tasman Highway and South Arm Highway) and industrial land, as shown in Figure 1, Figure 2 and Figure 3.

¹ <https://assets.ccc.tas.gov.au/uploads/2023/11/Public-Open-Space-Policy.pdf>

² https://hdp-au-prod-app-clrn-yoursay-files.s3.ap-southeast-2.amazonaws.com/7817/4969/1474/Open_Space_Strategy_Discisison_Paper_-_10_June_2025_FOR_WEBSITE.pdf

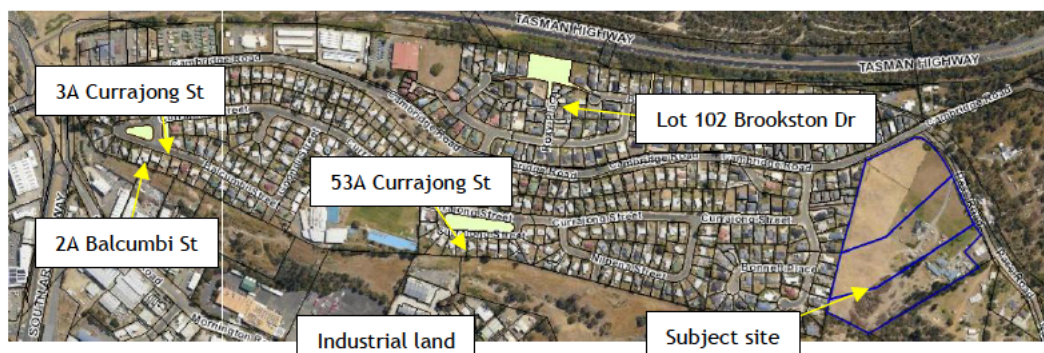


Figure 1 - Council land in eastern residential Mornington (source: LISTmap accessed 8.09.2026)



Figure 2 - 2A Balcumbi St and 3A Currajong St (left) and 53A Currajong St (right), Mornington (source: LISTmap accessed 4.09.2026)



Figure 3 - Lot 102 Brookston Drive, Mornington (source: LISTmap accessed 4.09.2026)

The Mornington Park area would be around a third larger than the undeveloped Lot 102, which adjoins Tasman Highway and is poorly configured from a ‘crime prevention through environmental design’ perspective.

Mornington Park would also serve the southern Cambridge, Mount Rumney and northern Rokeby catchments with a large, level, easily accessed area suitable for development with park facilities such as a regional playground.

As well as improving the community’s access to high quality public open space, by supporting a transition away from pocket parks in line with Council’s strategic direction, the proposal allows for more effective use of public funds for the maintenance and improvement of public open space in the municipality.

Affordable housing

The SAP includes provisions that support delivery of affordable housing, by allowing smaller lot sizes, greater site coverage and built form, and reduced private open space and car parking:

- CLA - SXX.7.1 Setbacks and building height for all dwellings on Multiple Dwellings Lots, and Villa Housing Lots;
- CLA - SXX.7.2 Site coverage and private open space for all dwellings on Multiple Dwelling Lots, and Villa Housing Lots;
- CLA - SXXX.8.1 Outline of development plan (A1/P1); and
- CLA - SXX.9 Car Parking Requirements.

The Tasmanian planning system does not formally accommodate the concept of ‘affordable housing’. However, the economic viability of private housing development is a key element in housing delivery and affordability. One of the fundamental determinants of economic viability is the cost of land, and the number of dwellings that can be developed on that land.

The SAP increases the allowable density of residential development in targeted areas of the site by facilitating small dwellings on correspondingly small lots, contributing to an increased range of dwelling typologies. Broader strategic work undertaken by the State³ links housing density and diversity to affordability. Similarly, the Planning Institute of Australia (PIA)’s planning principles for housing⁴ promote ‘fast track[ing] housing diversity and reduc[ing] unnecessary costs for medium and higher density housing,’ including through streamlined pathways for diverse housing types. Example actions in the PIA principles include simplified development assessment criteria for diverse housing types, reviewing minimum lot sizes and reviewing parking rates - each of which is delivered by the proposed SAP.

By reducing lot sizes and increasing density, the SAP provides for the delivery of more affordable housing options while maintaining a good quality of life through proximity to and orientation around the regional park as well as elevated building design requirements.

In addition, the SAP as submitted to the planning authority allowed for streamlining of future development of the land by providing pre-designed lot, road and building design solutions offering greater scope for a streamlined development pathway.

³ <https://www.stateplanning.tas.gov.au/have-your-say/consultations/state-planning-provisions-amendments/Improving-Residential-Standards>

⁴ <https://www.planning.org.au/common/Uploaded%20files/PIA/Policy/Housing/Planning-for-the-housing-we-need.pdf>

Reducing the regulatory burden in turn supports more rapid and cost-effective housing development, assisting in the delivery of greater housing availability and affordability.

On the other hand, the revised SAP certified by the planning authority excludes the specific masterplan layout, instead encapsulating the masterplan principles in the form of written controls. The controls provide Acceptable Solutions and Performance Criteria that offer flexibility in the layout of future subdivision within the General Residential Zone, while still allowing for reduced lot sizes for single dwellings supported by the elevated design requirements in the Buildings and Works standards.

Housing affordability also impacts on economic productivity⁵. While the application does not seek to rely on demonstrating a significant economic benefit, the proposal nevertheless supports the regional economy by improving housing options for essential workers, as well as through the contribution the proposal would make to the construction industry during its development.

s32(4)(b): the area of land has particular environmental, economic, social or spatial qualities that require provisions, that are unique to the area of land, to apply to the land in substitution for, or in addition to, or modification of, the provisions of the SPPs.

This test rests on the need for variance from the SPPs, owing to the particular qualities of the land. The application of SAPs to enact locality-specific masterplans and structure plans is a well-established practice in the Tasmanian planning system, which does not otherwise provide regulatory force for such plans. Examples within the Clarence municipality include:

- **CLA-S2.0 Lauderdale Neighbourhood Centre SAP**, the purpose of which is “to implement the recommendations of the *Clarence City Council Retail Analysis 2010* and the *Lauderdale Structure Plan 2011...*” (emphasis added).
- **CLA-S8.0 East Glebe Hill Specific Area Plan**, which solely provides for the layout and staging of a subdivision.

The proposed SAP similarly tailors planning controls to implement an orderly division, use and development of land specific to the opportunities and constraints of the site.

The Planning Report for the application states:

Under 4(b) the site has the spatial qualities of being located on the corner of two collector roads, level, free of natural values and hazards, and located in a suitable geographical area relative to other regional parks in the municipality. The site is also [now within] the UGB meaning there is scope to rezone the balance of the property as residential which further supports the development of the regional park. As such the site achieves the spatial quality requirements under 4(b).

The use of the SAP is necessary to ensure that development [delivers] the regional park in the appropriate way and that local business/housing is located to reinforce the space of the park. The road structure is also unique and requires governing through the SAP in terms of layout and structure. This would not be achieved with a general rezoning of the site.

⁵ <https://www.id.com.au/insights/articles/how-housing-affordability-can-play-a-role-in-economic-development/>

The SAP as submitted to the planning authority embedded a masterplan layout that responded directly to the site's specific qualities. The revised SAP certified by the planning authority does not include the specific masterplan layout, but nevertheless varies the SPPs in response to the land's specific qualities by:

- Allowing specific dwelling typologies and density not otherwise typically supported in the General Residential Zone (noting the Inner Residential Zone is not supported under the s8A zone application guidelines) - in a location with the topography, transport and servicing characteristics to support those typologies.
- Supporting amenity through elevated design requirements, open space, connectivity and neighbourhood centre assets - designed to offset the location-specific increased density.
- Tailoring the range of uses and reducing car parking requirements to ensure the highest and best use of the land - in the context of the increased residential density, proposed regional park and local activity centre.

The outcomes sought from these tailored controls pertain to the benefits discussed in relation to test (a) above.

3. The applicant is to provide further information about the impact of the reduction in car parking requirements from those in the C2.0 Parking and Sustainable Transport Code. The matters in the Use Standard at C2.5.1 P1.1 and P1.2 should be considered.

A TIA for the application is included at Appendix G of the Planning Report. A further Traffic Statement is provided at Attachment 1, detailing the rationale for the SAP's reduced parking rates with respect to considerations addressed under the SPPs at C2.5.1 P1.1 and P1.2.

The Commission also notes additional matters for discussion at the hearing including:

- ***the drafting of the specific area plan***
- ***how traffic circulation for the local business zone will impact the proposed development.***

MC Planners and Hubble Traffic will be available to discuss these matters at the hearing.

Directions dated 16 September 2026

The Commission invites the planning authority and applicant to make a submission on whether the draft amendment, as far as practicable, is consistent with the 2026 regional strategy.

The *Southern Tasmania Regional Land Use Strategy 2026* was declared on 11 September 2026 and was not in force when the amendment was certified by the planning authority on 13 May 2026. The Commission notes that there are currently no savings and transitional provisions in the legislation allowing for assessment of the proposal under the former strategy.

The proposal as submitted relied on two regional policy directives of the STRLUS 2010-2035: 'Settlement and Residential Development' and 'Land Use and Transport Integration.' The corresponding strategies under the STRLUS 2026 are 'Growth management' and 'Physical infrastructure.'

The following table provides a brief comparison of the two strategies and comments on the proposal's consistency with the current strategy.

Comparison of the relevant previous and current STRLUS strategies

STRLUS 2010-2035	STRLUS 2026	Comment
<u>Settlement and Regional Development</u> <i>SRD 1 Provide a sustainable and compact network of settlements with Greater Hobart at its core, that is capable of meeting projected demand.</i> <i>SRD 1.1 Implement the Regional Settlement Strategy and associated growth management strategies through planning schemes.</i> <i>SRD1.5 Ensure land zoned residential is developed at a minimum of 15 dwellings per hectare (net density).</i> <i>SRD 2 Manage residential growth for Greater Hobart on a whole of settlement basis and in a manner that balances the needs for greater sustainability, housing choice and affordability.</i> <i>SRD 2.1 Ensure residential growth for Greater Hobart occurs through 50% infill development and 50% greenfield development.</i> <i>SRD 2.1 Manage greenfield growth through an Urban Growth Boundary, which sets a 20 year supply limit with associated growth limits on dormitory suburbs.</i> <i>SRD 2.4 Recognise that the Urban Growth Boundary includes vacant land suitable for land release as greenfield development through residential rezoning as well as land suitable for</i>	<u>1. Growth management</u> <i>Cities, towns and villages grow sustainably and efficiently.</i> <i>Our communities are supported as they grow and change, and are diverse, connected and productive.</i> <i>1.1. Housing is accessible, affordable and suitable for diverse and changing needs.</i> <i>1.2. There is capacity for housing in the region to meet demand.</i> <i>1.3. Housing is suitable, affordable and well located for key workers particularly in health care, education and emergency services, or for demand generated by other industries or sectors.</i> <i>1.4. New housing is located to prioritise access to employment and services and to take advantage of active transport, open space and public transport networks.</i> <i>1.5. Land use planning incorporates measures to promote community health and wellbeing.</i> <i>1.6. Planning for new or expanded social infrastructure and services is aligned with where population growth is strategically planned across the region and considers the costs of and ability to deliver infrastructure and services that residents need.</i>	Both strategies seek sustainable delivery of well-located housing. However, while a compact urban form is still sought, the strategic emphasis has shifted towards delivering more affordable housing to meet demand, reflecting escalating housing pressures. The proposal is well-aligned with the current strategy, as it provides additional diversity in housing supply (including terraces, villa units and apartments) catering for the changing age structure of the population; leverages its well-serviced location near employment, public transport and social infrastructure; and provides for community wellbeing through a regional park and local service facilities. It is noted that the strategy seeks additional density (35+ dwellings/ha) within ~400m of a high frequency public transport corridor; the proposal delivers increased density with the site being located ~350m from the high frequency corridor mapped in the current STRLUS (Figure 21). Whilst the project has been discussed with Council regarding the acquisition of the regional park and the delivery of a complementary urban interface with it, no liaison with social housing agencies has occurred at this time.

other urban purposes including commercial, industrial, public parks, sporting and recreational facilities, hospitals, schools, major infrastructure, etc SRD 2.5 Implement a Residential Land Release Program that follows a land release hierarchy planning processes as follows: 1. Strategy (greenfield targets within urban growth boundary); 2. Conceptual Sequencing Plan; 3. Precinct Structure Plans (for each Greenfield Development Precinct); 4. Subdivision Permit; and 5. Use and Development Permit SRD 2.6 Increase densities to an average of at least 25 dwellings per hectare (net density)(i) within a distance of 400 to 800 metres of Integrated transit corridors and Principal and Primary Activity Centres, subject to heritage constraints. SRD 2.7 Distribute residential infill growth across the existing urban areas for the 25 year planning period as follows: Clarence LGA 15% (1987 dwellings) SRD 2.8 Aim for the residential zone in planning schemes to encompass a 10 to 15 year supply of greenfield residential land when calculated on a whole of settlement basis for Greater Hobart. SRD 2.9 Encourage a greater mix of residential dwelling types across the area with a particular focus on dwelling types that will provide for demographic change including an ageing population. SRD 2.10 Investigate the redevelopment to higher densities potential of rural residential areas close to the	1.7. Social services and infrastructure meet the changing needs of the community and their different age profiles in different parts of the region. <u>Growth management targets</u> A minimum of 50% of new dwellings in the metropolitan urban boundary are apartments, town houses, terraces or other multiple dwelling typologies. ~400m from high frequency public transport corridors = 35+ dwellings/ha <u>3.1.2.1 Growth management strategy...(b) Urban growth...is to... iii. in greenfield growth areas,...include opportunities for affordable and social housing supply based on consultation with relevant State agencies or authorities and social and affordable housing providers...iv be delivered through the application of appropriate planning controls, that are...b. integrated with infrastructure and service delivery for greenfield growth areas.</u> (c) Additional residential growth...is to demonstrate: i. the proposed planning controls are the most appropriate to deliver housing diversity in relation to lot sizes, and dwelling types and sizes; ii. convenient access to...social infrastructure...the ability to access public transport networks...to support the anticipated population...iv. opportunities to include measures that encourage more public transport and active transport use.	
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main urban extent of Greater Hobart. SRD 2.11 Increase the supply of affordable housing.		
<u>Land Use and Transport Integration</u> LUTI 1 Develop and maintain an integrated transport and land use planning system that supports economic growth, accessibility and modal choice in an efficient, safe and sustainable manner. LUTI 1.1 Give preference to urban expansion that is in physical proximity to existing transport corridors and the higher order Activity Centres rather than Urban Satellites or dormitory suburbs. LUTI 1.2 Allow higher density residential and mixed use developments within 400, and possibly up to 800 metres (subject to topographic and heritage constraints) of integrated transit corridors. LUTI 1.5 Locate major trip generating activities in close proximity to existing public transport routes and existing higher order activity centres. LUTI 1.6 Maximise road connections between existing and potential future roads with new roads proposed as part of the design and layout of subdivision. LUTI 1.7 Protect major regional and urban transport corridors through planning schemes as identified in Maps 3 & 4. LUTI 1.8 Ensure new development incorporates buffer distances to regional transport corridors identified in Map 4 to	<u>5. Physical infrastructure</u> Southern Tasmania invests in and prioritises infrastructure in its existing settlements, while new infrastructure is delivered in logical and sequential ways, supporting the equitable sharing of costs to provide for communities to prosper economically and socially. 5.1. Compact urban form, encouraging infill and densification, provides for efficient use of all infrastructure and services to improve social, environmental and economic outcomes. 5.2. Transport networks are integrated with where people live and work, and with the services and facilities that support their daily lives. 5.3. Activity is prioritised in growth areas and to improve access to activity centres, employment hubs and other modes of transport. 5.4. Freight movement networks provide access to key industry sites, industrial areas, ports and distribution hubs.	The previous strategy focussed on maximising the utility of existing infrastructure, primarily through preferencing development in locations already well-served. The strategy included an emphasis on active and public transport, as well as maximising new road connections and protecting transport corridors. The current strategy similarly seeks efficient use of infrastructure, although in line with the altered settlement strategy, there is less emphasis on avoiding the need for infrastructure expansion. Rather, the strategy focusses on ensuring infrastructure is able to support integrated growth. The proposal aligns with the current strategy as it demonstrates serviceability of the land to support the targeted growth, with road and utilities connections and associated upgrades to existing networks, and is both outside any road or railway attenuation area, and ~350m from a high frequency public transport corridor on Cambridge Road as identified in the current STRLUS (Figure 21).

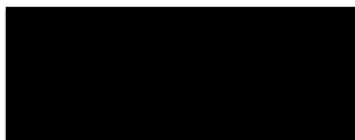
<i>minimise further land use conflict</i> <i>LUTI 1.9 Ensure car parking requirements in planning schemes and provision of public car parking is consistent with achieving increased usage of public transport.</i> <i>LUTI 1.11 Encourage walking and cycling as alternative modes of transport through the provision of suitable infrastructure and developing safe, attractive and convenient walking and cycling environments.</i>		
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In summary, the proposal is consistent with STRLUS 2026 and aligns well with the shift in strategic emphasis relative to the previous regional strategies.

If you require any further information or would like to discuss the above, please contact us at [REDACTED]

Yours faithfully

MC PLANNERS PTY LTD



Mat Clark

DIRECTOR/PRINCIPAL PLANNER



ATTACHMENT 1

Traffic Statement

Traffic Statement

Rezoning of 471 Cambridge Road for new
residential housing



Hubble Traffic

September 2026

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Version	Date	Reason for Issue
Draft	September 2026	Draft issued to client
Final	September 2026	Final issued

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1. Introduction

The Planning Commission has requested information about the impact of reducing car-parking requirements from those contained in the C2 Parking and Sustainable Transport Code. The relevant consideration is whether the alternative provisions proposed through the Specific Area Plan would accommodate the reasonable parking demand generated by the development without causing an unreasonable loss of residential amenity or adverse impacts on the safety and operation of the internal road network.

This assessment is based on the proposed masterplan submitted as part of the Traffic Impact Assessment and has been prepared prior to Council developing a draft Specific Area Plan.

The proposed development differs from a conventional low-density residential subdivision. It is expected to accommodate approximately 112 to 118 dwellings, comprising 54 standalone residential lots, approximately 58 townhouses, and six residential units associated with the future local-business precinct. This housing mix, together with the rear-laneway townhouse form, public open space, pedestrian connections and future local services, forms part of an integrated neighbourhood design intended to provide greater housing diversity and more efficient use of serviced residential land.

2. Basis for an alternative parking rate

The numerical parking requirements of the C2 Code provide a standardised approach applicable to a broad range of residential developments and locations. The proposed Specific Area Plan provides an opportunity to establish provisions that respond more directly to the particular housing types, site design and anticipated parking characteristics of this development.

The alternative parking provisions are not intended to apply an arbitrary or uniform reduction across all dwellings. Rather, they would provide sufficient flexibility for parking supply to respond to dwelling size, configuration and likely occupancy. Standalone dwellings would retain the capacity to provide parking within their individual lots, while townhouses could incorporate either single or double garages depending on their final design, floor area and intended housing market.

A single garage may be appropriate for a smaller two-bedroom townhouse or affordable housing product that is likely to accommodate a smaller household. Larger townhouses capable of accommodating larger households could provide additional parking, including double garages, where warranted by their size and anticipated parking demand. This approach enables parking provision to be matched more closely to the housing product instead of imposing the same outcome irrespective of dwelling characteristics.

The assessment should therefore focus on whether the alternative rate will meet the reasonable parking demand generated by the proposed housing mix, rather than whether it reproduces the numerical outcome applying to conventional residential development.

3. Housing diversity

The proposed development is intended to provide housing products across a range of dwelling sizes, configurations and price points. Smaller dwellings and medium-density townhouses form an important part of this housing mix and are likely to accommodate singles, couples, smaller families and households seeking more affordable housing options.

The cost of purchasing, maintaining, insuring and operating multiple vehicles can represent a significant household expense. Smaller and more affordable dwellings may therefore generate different parking demands from larger detached family homes. This is particularly relevant where residents have access to public transport, pedestrian connections and local facilities, and where flexible and home-based working arrangements may reduce the need for daily commuting by private vehicle.

These considerations do not establish that every smaller household will own only one vehicle. They do, however, support a planning framework that allows parking provision to respond to the anticipated characteristics of different dwelling types rather than assuming that every two-bedroom dwelling will generate the same demand regardless of its size, location, affordability or intended occupants.

Requiring every dwelling to provide the maximum conventional parking supply can also increase the amount of land and building area devoted to garages, driveways and vehicle manoeuvring. This may increase development costs and reduce opportunities for smaller dwellings, landscaping, private open space and improved pedestrian-oriented streetscapes. The proposed alternative rates therefore provide a direct planning benefit by supporting housing diversity, affordability and efficient land use while continuing to require dedicated resident parking.

4. Rear-laneway townhouse

The townhouse precincts use a rear-laneway arrangement under which vehicle access and garaging are located behind the dwellings. While this housing form is relatively new within Clarence, it represents a contemporary design response that supports greater housing diversity and more efficient use of serviced urban land.

The rear-laneway arrangement is an integral part of the urban design rather than solely a vehicle-access measure. Moving garages and driveways away from the primary frontage reduces their visual dominance, supports more continuous streetscapes and enables dwelling entrances and habitable rooms to address public streets and open space. This improves pedestrian amenity and opportunities for passive surveillance while retaining convenient off-street parking for residents.

The rear laneway will be privately owned and likely to be managed by a body corporate. It is a 6-metre-wide, two-way shared environment providing access to townhouse garages and accommodating servicing requirements. As a privately managed accessway, it is intended to operate at low speed, incorporate traffic-calming measures and serve local access only. The laneway is not part of the public road hierarchy and is not intended to function as a conventional residential street or provide on-street parking. It must remain unobstructed for vehicle manoeuvring and servicing, with parking management undertaken through body-corporate arrangements.

Resident parking will be provided within individual townhouse lots, while visitor and occasional overflow demand will be accommodated within the surrounding public street network and dedicated indented parking bays.

5. Street network and on-street parking capacity

The subdivision includes a hierarchy of public roads derived from the LGAT Standard Drawings for urban roads. The primary connecting streets are proposed with 8-metre-wide pavements within 18-metre-wide reservations, while the local access streets generally have 6-metre-wide pavements within 15-metre-wide reservations. These reservations also accommodate associated infrastructure, including drainage, footpaths and landscaping.

The private rear laneway is not part of this LGAT-based road hierarchy. It functions solely as a low-speed accessway to townhouse garages and likely to be managed by a body corporate. Its private status does not alter the traffic-volume conclusions of the TIA, as it serves only local resident movements and is not intended to accommodate visitor parking or through-traffic.

Resident parking will primarily be accommodated within individual lots and townhouse garages. Consequently, the public street network is not intended to provide the primary parking supply for occupants. Its parking function is supplementary, accommodating visitors and occasional overflow demand.

Intermittent kerbside parking within low-volume local streets is not expected to prevent those streets from fulfilling their access function. It may also reinforce their low-speed residential character by encouraging drivers to moderate their speed and yield where necessary. The wider connecting streets provide additional capacity for visitor parking while maintaining through movement.

6. Visitor parking

Dedicated indented parking bays are proposed adjacent to the public open space. This places parking near the principal visitor destination, reduces pressure on adjoining residential frontages and limits reliance on kerbside spaces elsewhere in the subdivision.

As the rear laneway will be privately managed and must remain unobstructed for access and servicing, no visitor parking will be permitted within the laneway. Visitor demand will instead be accommodated through the indented bays and supplementary kerbside opportunities on the public street network.

These bays provide a flexible resource for visitors to the recreation area and nearby residences. During periods of higher recreational use, additional short-term demand can be accommodated within the broader internal street network. Such occasional demand would not, in itself, establish that the parking supply is inadequate, provided the surrounding streets continue to perform their access, service and safety functions.

This distributed strategy comprising on-site resident parking, rear-access garages, indented visitor bays and supplementary on-street parking, avoids reliance on a single parking source and provides flexibility to respond to variations in demand across the development.

7. Significance of the Specific Area Plan

The proposed parking provisions should be considered as part of the integrated design and planning objectives of the Specific Area Plan, not simply as a numerical reduction from the C2 Code. The alternative rates form part of a broader planning response intended to facilitate:

- a range of dwelling sizes and configurations;
- medium-density and rear-laneway housing;
- more affordable housing opportunities;
- efficient use of serviced residential land;
- improved streetscape and pedestrian outcomes; and
- integrated public open space and neighbourhood facilities.

The Specific Area Plan provides a site-responsive framework through which these outcomes can be balanced against the reasonable parking requirements of residents and visitors. Reduced parking is therefore not an end in itself. It is a means of supporting an alternative urban form while ensuring that sufficient parking remains available and that the street network continues to operate safely and effectively.

8. Conclusion

The departure from the standard C2 parking rates is considered supportable because it responds to the proposed dwelling mix and forms an integral part of the Specific Area Plan's housing, affordability and urban-design objectives. The development would not be left without resident or visitor parking. Instead, demand would be accommodated through a coordinated combination of parking within individual lots, single or double townhouse garages matched to dwelling characteristics, dedicated indented visitor bays and supplementary on-street parking within the public road network.

References to "internal roads" relate to the public street network. The private rear laneway has been assessed separately as a low-speed access environment likely to be managed by a body corporate. Its private status does not alter the parking-demand assessment, as resident parking is provided within townhouse lots and visitor parking is accommodated within the public street network.

The TIA concludes that the public internal roads have sufficient capacity to accommodate the expected development traffic and parking activity. The proposed roads reflect their intended function, follow the relevant LGAT urban-road standards and are supported by low forecast traffic volumes.

Accordingly, the proposed Specific Area Plan parking rates represent a balanced and performance-based response. They provide the flexibility necessary to deliver smaller and more diverse housing products while retaining sufficient parking to meet reasonable resident and visitor demand. On that basis, the proposed variation is not expected to cause an unacceptable impact on residential amenity, road safety, servicing or the operation of the internal street network.