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Sent: Monday, 19 April 2021 3:48 PM
To: planning@wtc.tas.gov.au
Cc: vicki
Subject: I2021158720 - LPS Submission: 185 Gravelly Beach Rd, Gravelly Beach
Attachments: Combined Docs LPS Submission Gillies.pdf; Appendix A Exeter Structure Plan.pdf; Appendix B Exeter Structure Plan progress report.pdf; Appendix C 185 Gravelly Beach sample lot layout.pdf

Dear WTC Planning Department,

Please find attached documentation associated with the LPS Submission for our clients Brett and Vicki Gillie of 185 Gravelly Beach Rd, Gravelly Beach.

Kind regards,

Justine Brooks
Senior Town Planner
MEnvPlg MPIA

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LPS REPRESENTATION
OBO
BRETT & VICKI GILLIE

WEST TAMAR COUNCIL
DRAFT LOCAL PROVISIONS
SCHEDULE



PDA Surveyors

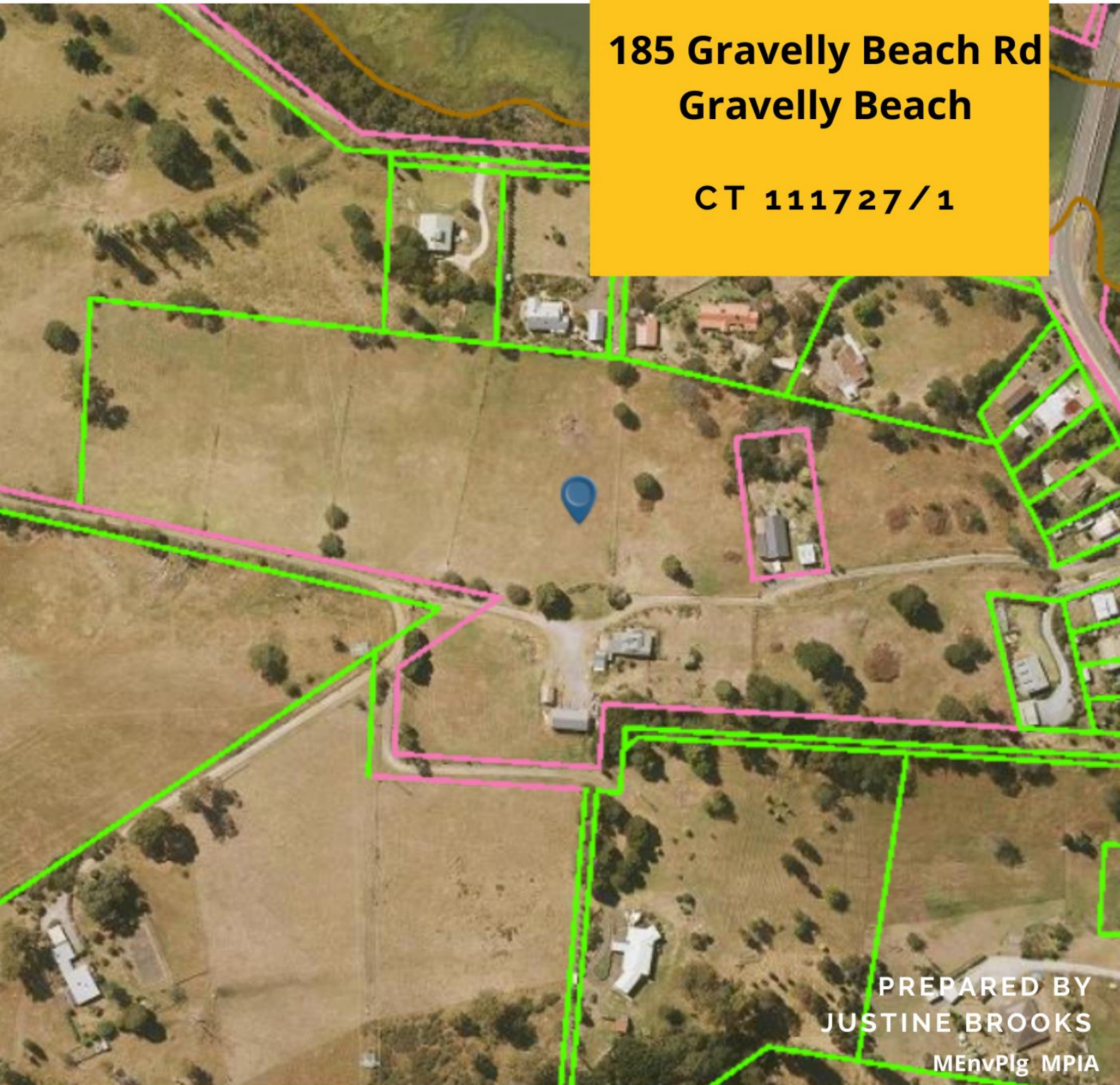
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**185 Gravelly Beach Rd
Gravelly Beach**

CT 111727/1



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19th March 2021

The General Manager
West Tamar Council
2-4 Eden Street
Riverside TAS 7250

Emailed: planning@wtc.tas.gov.au

Dear Sir

**REPRESENTATION TO DRAFT LOCAL PROVISIONS SCHEDULE FOR
LAND AT 185 GRAVELLY BEACH ROAD, GRAVELLY BEACH.**

Our clients, Vicki and Brett Gillie, have been notified that the Tasmanian Planning Commission has directed the Council to publicly exhibit the DRAFT Local Provisions Schedule (LPS) under section 35B of the Land Use Planning and Approvals Act 1993 (LUPAA). This Representation is made having regard to the matters listed under section 35E of the *Land Use Planning and Approvals Act 1993*.

PDA has undertaken a review of the LPS and makes the following Representation on behalf of our clients. According to S 34 of the Land Use Planning and Approvals Act 1993 and the S 8a Guidelines prepared by the Tasmanian Planning Commission, we seek consideration of applying a more appropriate zone to the subject land.

Do not hesitate to contact me should you require additional information or clarification about any of the statements made in the attached Representation.

Yours sincerely

Justine Brooks
PDA Surveyors, Engineers & Planners

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REPORT PREPARED FOR Brett & Vicki Gillie – Client
PDA CONTRIBUTORS Justine Brooks Senior Planner

DOCUMENT STATUS

Revision	Author	Reviewer	Date
0	Justine Brooks	Clients: Brett & Vicki Gillie	7/04/2021
1		Land owner/ Clients consent to lodge: received via email	13/4/2021



Table of contents

1.	Executive summary.....	3
2.	Glossary	3
3.	Background	4
3.1	Subject site	4
3.2	Available Service Infrastructure	4
3.3	Northern Tasmania Regional Land Use Strategy	5-7
3.4	Council's acknowledgement of the strategic importance of the site ..	7
3.5	Zoning application: Section 8A guidelines	.. 8
4.	Submission.....	8-9

Table index

Table 1	Definitions	3
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Figure index

Figure 1	Site plan4
Figures 2 & 3	Infrastructure serviceability	5

Appendices

Appendix A: Exeter Structure Plan extract: Page 14 – Future Options -reference to the subject land

Appendix B: Progress Report on projects included in the current Exeter Structure plan

Appendix C: Sample Subdivision and Road layout



1. Executive Summary

Our clients land, located at 185 Gravelly Beach Road, Gravelly Beach (the subject land), is proposed to be zoned 'Rural Living C' through the application of the LPS. It is our client's belief, which is supported by our professional assessment, that a more appropriate application of zone for the subject land would be *Low Density Residential (LDRZ)* and that the subject site should be included in the *Residential Supply and Density Specific Area Plan* (WTA-S3.0) given the strategic importance of the site in regard to the implementation and development of the Exeter Structure plan, and in particular, the improved connectivity that could be facilitated between Exeter and Gravelly Beach.

2 Glossary

Term	Definition
Council	West Tamar Council
TPC	Tasmanian Planning Commission
Guideline	<i>Guideline No. 1 – Local Provisions Schedule Zone and Code Application</i> (Tasmanian Planning Commission, 2018)
LPS	Local Provision Schedule
LGA	Local Government Area
The Scheme	West Tamar Interim Planning Scheme 2013
TPS	Tasmanian Planning Scheme
UGB	Urban Growth Boundary
RLUS	Regional Land Use Strategy (2018)n
RSN	Regional Settlement Network
DSC	District Service Centre
GLP	Greater Launceston Pla
SPP	State Planning Provisions
RLZ A/B/C	Rural Living Zone A/B/C
LDRZ	Low Density Residential Zone
LBZ	Local Business Zone



3 Background

3.1 Subject Site

The subject site is located at 185 Gravelly Beach Road, Gravelly Beach and is currently zoned Rural Living under the *West Tamar Council Interim Planning Scheme 2013*.

The title is an irregular shaped parcel of land measuring approx. 5.6ha, which wholly surrounds a smaller title measuring approx. 2080m² under separate ownership. This title 62197/1 (187 Gravelly Beach Rd) is also zoned, inappropriately, Rural Living. This appears to be a historically unorthodox subdivision that relies on a right of way over our clients land.

The surrounding pattern of zoning and development ranges between 800m² (average), General Residential zoned land to the East and larger 7ha+, Rural Living zoned land to the South, West and North. A cluster of LDRZ land is located further to the North East, across the Stony Brook inlet, and contains around 40 titles ranging between 530m² and 4400m². The Local Business zone in Exeter is located just 380m to the Western edge of the subject site. It can be accessed via an unmade 'subdivision road' (title 198385/2), locally known as Trail road, connecting with Glen Ard Mohr Road, which contains Exeter's Primary and High Schools and the regions only Childcare Centre.

Our client has previously discussed providing land to Council to develop an access road between Exeter and Gravelly Beach, which has been identified as strategically crucial in several documents, including the Exeter Structure Plan.

Discussions between Council and the landowner have occurred over many years regarding the strategic importance of the subject site, with our client participating in the consultation process for the Interim Scheme in 2013, with both Council and the Tasmanian Planning Commission, and more recently, the Exeter Structure Plan and the current Tasmanian State Planning Scheme.



Figure 1: Site Plan – Extracted ListMap 19/4/21



3.2 Available Service Infrastructure

185 Gravelly Beach road should not be zoned Rural Living C given it is a fully serviced site. The TasMap extract below shows the extent of the TasWater Sewer and Water servicing coverage for the broader Exeter Township, which includes our clients land. In addition to this, there is a firefighting hydrant located at the entrance to the site with power and storm water also able to be connected / managed.

Our clients request for to have the LDZ applied to their land is particularly evident when compared to the existing LDZ development to the North of the subject site (directly to the north, adjoining Stony Brook inlet) which is not fully serviced.

More information is provided regarding the sites serviceability later in this submission when reviewing the Tasmanian Commissions Section 8A guidelines for zone application.



Figures 2 &3: Infrastructure Serviceability: Sewer (Maroon), Water (Blue)

Extracted Listmap 19/4/21

3.3 Northern Tasmanian Regional Land Use Strategy

Exeter, incorporating Gravelly Beach, is identified within the RLUS as a *District Service Centre (DSC)* in the Settlement Types hierarchy. The Role of the DSC is to:

- *To provide predominantly non-urban communities with a range of goods and services to meet their daily and weekly needs.*
- *Provides that trips to larger centres are only required occasionally.*

Relevant to this submission, the guidelines provide the following for Residential development:

- *Some ‘in-centre’ residential development, complemented by infill and **consolidation of surrounding residential areas at medium to higher densities** (up to 25 dwellings per hectare)*

The guideline for land use and development state:

Transport and Access

- *Where possible, support new urban development contiguous with, or otherwise*



provide the development with direct transport linkages to established urban areas as a development priority including linkages with the 'regional access network' identified for the Greater Launceston Area.

- *Support well-planned communities with good access to public transport that links residential areas to employment, facilities and services.*
- *Reduce reliance on vehicle transportation and promote walkability.*
- *Accommodate regional growth in locations supported by public transport and other sustainable transport choices.*

The improved connectivity provided by constructing a road connecting Glen Ard Mohr Rd and Gravelly Beach Rd will make it possible for the young people of Gravelly Beach to walk safely to school, dramatically reducing the distance. The commuting distance will be less than one KLM compared to the current three KLM measured from the same starting point at the subject site entrance. A new connector road will also take a significant amount of pressure off Glen Ard Mohr Road and the West Tamar Highway intersection, which is highly congested between 8.30 – 9.00 am and 2.45 – 3.30 pm, along with the intersection between Gravelly Beach Rd and West Tamar Highway.

We believe our clients request to have their land included in the LDRZ aligns with the Regional Planning Policies contained within the Northern Regional Land Use Strategy.

The Regional Network Settlement policy (E.2) outlines the strategy to address the management of regional growth with *E.2.3: Key Settlement Network Strategies* providing specific guidelines for the Settlement Patterns broader region.

The Regional Settlement Network policy 1 states:

*Urban settlements are contained within Identified Urban Growth areas. No new settlements are allowed and opportunities for expansion will be restricted to locations where there is a demonstrated housing need, **particularly where spare infrastructure capacity exists (particularly water and sewer)***

Our clients request is further supported through its alignment with various **Policy Actions** which provide guidelines to Council where they should be concentrating on applying zones that facilitate development:

RSN-A1: Provide and adequate supply of well located and serviced residential land to meet projected demand. Land owners/ developers are provided with the details about how development should occur through local settlement strategies, structure plans and planning schemes. Plans are to be prepared in accordance with land use principles outlined in the RLUS, land capability, infrastructure capacity and demand.

RSN – A4: Provide for long term future supply of urban residential land that matches existing and planned infrastructure capacity being delivered by Taswater, specifically parallel with existing water and sewerage capacity and required augmentation to meet urban development growth and capacity – both residential and industrial.



RSN-A6: Encourage urban residential expansion in-and-around the regions activity centre network to maximise proximity to local employment, services and the use of existing infrastructure, including supporting greater public transport use.

*RSN A7: Ensure all rural and environmental living occurs **outside** the Urban Growth Areas.*

3.4 Council's acknowledgement of the Strategic Importance of the site

The subject site has been directly mentioned in the Exeter Structure plan, particularly in relation to facilitating a strategically important road link between Gravelly Beach and Exeter.

Page 14 of the Exeter Structure Plan states:

Road Link to Gravelly Beach through 185 Gravelly Beach Road, Blackwall

The council should support the rezoning of this land to the Low Density Residential zone, provided that the subdivision layout provides for public road access through the lot towards Glen Ard Mohr Road. Next steps:

- *Investigate link from Gravelly Beach Road to Glen Ard Mohr Road and potentially Murray Street;*
- *The council should be involved in any future plans to rezone and subdivide 185 Gravelly Beach Road and should require a through road as part of the subdivision layout.*

Under the desired LDRZ, our client would seek to develop the site by positioning the access road through the centre of the title with subdivision of land along either side in line with the lot size guidelines for the *Residential Supply and Density Specific Area Plan* (5000m²).

Under the proposed zone, Rural Living C, the land cannot be further subdivided which means a road link through the middle of the title will not be possible.

An example of possible subdivision and future road layout is provided in Appendix C.

3.5 Zoning application: Section 8A guidelines

Guideline No.1 Local Provisions Schedule (LPS): Zone and code application

Why the land should be zoned Low Density Residential

Referring specifically to the application of the Low Density Residential Zone, the following guidelines are provided:

LDRZ1 The Low Density Residential Zone **should** be applied to residential areas where **one** of the following conditions exists:

- (a) Residential areas with large lots that cannot be developed to higher densities due to any of the following constraints:
 - (i) Lack of availability or capacity of reticulated infrastructure services, unless the constraint is intended to be resolved before the development of the land; and



- (ii) Environmental constraints that limit development (e.g land hazards, topography or slope)

The subject site does have access to reticulated services and while it does have some constraints due to the impact of the Electricity Transmission Corridor through the property, low density development can still occur unimpeded. A sample subdivision plan is provided as an appendix to this report to demonstrate the potential development of the site.

Why the land should not be zoned Rural Living

The guidelines state that the purpose of the Rural Living Zone 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.

Our clients land is fully serviced, with reticulated water and sewer services available at the front of the title and provisions available to connect electricity and telephone/ internet services and infrastructure to manage stormwater.

The site does not have natural or landscape values that would be deemed sensitive enough to be protected or maintained, given the site has previously been cleared of vegetation.

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

The subject site adjoins the General Residential Zone to the East and Rural Living properties to the North, West and South, none of which are used for agricultural purposes, and all used for larger residential lots. Establishing any form of active agricultural use on the site is likely to impact the surrounding residential amenities adversely.

Of particular note in the guidelines is RLZ4 which states:

*The Rural Living Zone should **not** be applied to land that:*

*(a) **Is suitable and targeted** for future greenfield urban development.*

The Exeter Structure Plan states that *Council should support rezoning this land to LDR.*

4 Submission

Our client is seeking to have their land located at 185 Gravelly Beach Road in the *Residential Supply and Density Specific Area Plan* and zoned *Low Density Residential*. The land is currently zoned Rural Living and is proposed to be zoned Rural Living C through Councils draft LPS. We believe several inconsistencies exist between Councils zone application and the *Guideline No. 1 – Local Provisions Schedule: Zone and Code application*, as provided by the TPC, aside from the obvious fact that the land was previously incorrectly zoned Rural Living.

It is noted that before the implementation of the 2006 scheme, the subject land was previously zoned *Closed Residential* and *Utility Services*. The land was rezoned Rural Living for the 2006 scheme and then translated 'like for like' in the 2013 scheme. Our client



participated in the public consultation process associated with the Interim Scheme implementation and lodged a submission, highlighting that the application of the RLZ, directly against the GRZ, was not in accordance with the zone application guidelines provided as part of the Interim Scheme process. In the Municipal Planners report specifically responding to our client's submission, it was stated that *"Council is currently preparing a Structure plan for the Exeter Township, and the Northern Tasmania Housing Study is nearing completion. Both documents are likely to impact on land identification for future development. The Location of the subject land suggest that they may be considered as part of that process"*

Both the Northern Tasmania Housing Study and the Exeter Structure plan have now been developed, and as predicted, the subject site features as strategically crucial in the Exeter Structure Plan, which, as previously outlined, states that the Council should support rezoning of this land to LDRZ

Justifications to support the application of the LDRZ, and inclusion in the *Residential Supply and Density Specific Area Plan* are provided within the LPS zone and code application guidelines due to the land being fully serviced and identified by Council, through strategic analysis, as being a site suitable for future Greenfield urban development.

The application of the LDRZ on this site will benefit the land owner through not only the provision of further development but also the broader community by providing a new direct point of access through to the educational and business centre of Exeter. There will also be a positive impact on the road network, particularly at peak usage time.

Riverside locations such as Gravelly Beach are currently in high demand with average sales times sitting below 30 days, particularly if that land has impressive water views, such as the subject land would have. A desktop analysis of vacant residential land within the area reveals that aside from a recent subdivision in Exeter, which is selling well, there is minimal land available for development. In fact, when writing this report, there was one vacant lot available for sale in Blackwall and one under offer in Loira.

In accordance with the RLUS(RSN A1/ A2/ A3), the future subdivision and development of this site would be:

- *within an existing settlement,*
- *would be well located and serviced to meet residential land supply demands,*
- *would provide the ability to restructure underutilised land and*
- *the development would align with the Exeter Structure Plan.*

showground operations including the Exeter Show would continue unchanged. Next step:

- Approach Exeter Show Society with a Council proposal for access and what Council could provide in return.

Future Options

Option to purchase the vacant land south of The Exeter Hotel

If and when this land is offered for sale, Council should be in a position to weigh up the benefits of Council owning the land versus the asking price. Benefits include:

- Better land management, particularly in relation to weed infestation and the interface with Stony Brook;
- Control over a future option for a road link, including associated land development, and;
- Council ownership and management of the existing car park area fronting Main Road.

Next step:

- Council is made aware when the property is put on the market and is in a position to act decisively.

Road link to Gravelly Beach through 185 Gravelly Beach Road, Blackwall

Council should support rezoning of this land to low density residential, provided that the subdivision layout provides for public road access through the lot towards Glen Ard Mohr Road. Next steps:

- Investigate link from Gravelly Beach Road to Glen Ard Mohr Road and potentially Murray Street.
- Council should be involved in any future plans to rezone and subdivide 185 Gravelly Beach Road and should require a thru road as part of the subdivision layout.

The Future of the Structure Plan

The structure plan has a planning time horizon of 20 years, consistent with the Regional Land Use Strategy (Northern Region). It will not however remain a static document during this period. The following review process should be undertaken:

- Progress reports on the projects, particularly when projects are directly inter-related.
- A review of residential land take-up and the availability of land zoned General Residential after five and ten years.

Progress Report on projects included in the current Exeter Structure Plan

Projects	Current status
Short term	
Development of passive recreation facilities on the Clarke land including re-alignment of the walkway between Glen Ard Mohr Road and Exeter	✓ In progress. Goat track and footpaths on Glen Ard Mohr Road have been upgraded
A walking track will encourage walkers currently using Glen Ard Mohr Road between the Goat Track and Exeter to cut through the Clarke land (a 30% shorter route).	
Business Promotion Signage	✓ Information signage installed
Provide attractive and informative business and community facilities signage on Frankford Road approximately 800m west of Main Road.	
Exeter and Gravelly Beach Advisory Group Branding <i>(previously the Exeter Improvement Committee)</i>	✓ Community branding completed and adopted for completed projects
Ensure projects are consistent with the rebranding project.	
Form-based Controls for Main Road	✗ Not progressing – the introduction of the Tasmanian Planning Scheme will standardise development controls in relation to the design and siting of buildings
Introduce form – rather than use – based statutory planning controls for property fronting both sides of the Main Road between Frankford Highway and Glen Ard Mohr Road.	
Subject to further work	
Exeter Community Precinct	
<ul style="list-style-type: none"> • Consolidate community services on the site of the Exeter Recreation Centre (RSL), possibly within a new building. • Relocation of Tresca Services. • Future consideration of also co-locating the library, medical facilities and scouts. 	✓ Exeter Community Hub opened in 2019 ➡ Subject to external funding ➡ Subject to external funding
Biloo Street Public Park and Carpark	
<ul style="list-style-type: none"> • Develop a public park. • Develop a link to the tourist information centre. • Upgrade informal parking at 57 Main Road (Visitor Centre). 	✓ Public park completed ➡ Not completed ➡ Subject to future planning
Better utilise the RV Overnight Park at Gravelly Beach	✗ Legislation does not permit more than an overnight stay
Increase maximum stay from overnight only.	
Primary Producer Incubator	✓ Kitchen established as part of the Community Hub Other subject to external funding and business case
Provide space for small primary producers to process goods, potentially including warehouse and retail space (at the Community Hub or within the precinct)	
Exeter Showgrounds	➡ To be determined by the Exeter Show Society
Discuss with the Exeter Show Society public access to the Showgrounds. Current showground operations including the Exeter Show would continue unchanged.	
Future options	
Option to purchase the vacant land south of The Exeter Hotel (122 Main Road, Exeter)	➡ Subject to future consideration – Remains in private ownership
Council to consider future purchase of site to enable better land management, control over future option for a road link and development and ownership of existing car park.	
Road link to Gravelly Beach through 185 Gravelly Beach Road, Blackwall	➡ Currently included in the Rural Living Zone. An application has not been made to change the zoning of the land
Support rezoning of this land to low density residential, provided that the subdivision layout provides for public road access through the lot towards Glen Ard Mohr Road.	



E				
D				
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REV	AMENDMENTS	DRAWN	DATE	APPR.

NOTES:
This plan is for demonstration purposes only to show a possible layout design and lot yield

SURVEYOR	GEOCIVIL
n/a	n/a
DRAWN	CHECKED
AB	JB
DATE	
12/4/21	

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