



COUNCIL MEETING AGENDA

NOTICE is hereby given that an Ordinary meeting of the Kingborough Council
will be held in the Kingborough Civic Centre, 15 Channel Highway, Kingston on
Monday, 3 August 2026 at 5.30pm

Kingborough Councillors 2022 - 2026



Acting Mayor
Councillor Christian Street



Councillor Aldo Antolli



Councillor David Bain



Councillor Gideon Cordover



Councillor Kaspar Deane



Councillor Flora Fox



Councillor Amanda Midgley



Councillor Mark Richardson

QUALIFIED PERSONS

In accordance with Section 65 of the *Local Government Act 1993*, I confirm that the reports contained in Council Meeting Agenda No. 14 to be held on Monday, 3 August 2026 contain advice, information and recommendations given by a person who has the qualifications or experience necessary to give such advice, information or recommendations.



Dave Stewart
CHIEF EXECUTIVE OFFICER
being the General Manager as appointed by the
Kingborough Council pursuant to section 61 of the
Local Government Act 1993 (TAS)

Tuesday, 28 July 2026

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GUIDELINES FOR PUBLIC QUESTIONS

Division 4 of the *Local Government (Meeting Procedures) Regulations 2025*

This guide helps community members understand how to ask questions during Public Question Time at a Council meeting or sending in questions to be placed on the meeting Agenda, based on the [Local Government \(Meeting Procedures\) Regulations 2025](#), as well as any other determinations made by Council.

Please remember, this time is for asking questions only—there will be no discussion or debate about the questions or the answers.

How to Ask a Question:	You can ask a question either: • In writing (before the meeting) (see questions on notice below), or • In person at a regular Council meeting (see questions without notice below). Your question must be about Council activities only.
Purpose of Question Time:	• This time is for asking questions, not for debating them. • Answers will be given, but there won't be any discussion.
Written Questions (Questions on Notice):	• Must be sent at least 7 days before the meeting. • The 7-day period includes weekends and public holidays, but not the day you submit the question or the day of the meeting. • Title your submission clearly as “Question/s on Notice.”
Verbal Questions (Questions Without Notice):	• At least 15 minutes will be set aside during the meeting for these. • A maximum of three (3) questions will be allowed per person, per meeting. • You can't ask about topics already on the meeting agenda. • If your question can't be answered right away, it will be answered at the next meeting or as soon as possible.
Rules for Asking Questions:	Your question should: • Be short and clear; • Not be a statement; • Have little or no introduction. The Chairperson may reject your question if it: • Is offensive, defamatory, or illegal; • Doesn't relate to Council business; • Is unclear, repetitive, or about confidential matters.

AGENDA of an Ordinary Meeting of Council
Kingborough Civic Centre, 15 Channel Highway, Kingston
Monday, 3 August 2026 at 5.30pm

WELCOME

The Chairperson will declare the meeting open and welcome all in attendance. The Chairperson will advise all persons attending the meeting that they are to be respectful of, and considerate towards, other persons attending the meeting.

AUDIO RECORDING

The Chairperson will advise that Council meetings are recorded and made publicly available on its website. In accordance with Council's policy the Chairperson will request confirmation that the audio recording has commenced.

1 ACKNOWLEDGEMENT OF TRADITIONAL CUSTODIANS

The Chairperson will acknowledge the traditional custodians of this land, pay respects to elders past and present, and acknowledge today's Tasmanian Aboriginal community.

2 ATTENDEES

Councillors:

Acting Mayor Councillor C Street
Councillor A Antolli
Councillor D Bain
Councillor G Cordover
Councillor K Deane
Councillor F Fox
Councillor A Midgley
Councillor M Richardson

3 APOLOGIES

4 CONFIRMATION OF MINUTES

RECOMMENDATION

That the Minutes of the open session of the Council Meeting No. 13 held on 20 July 2026 be confirmed as a true record.

5 WORKSHOPS HELD SINCE LAST COUNCIL MEETING

Date	Topic	Detail	Consultant
27 July	Regional Sports & Recreation Plan	A briefing was provided on the Draft Greater Hobart Sports Infrastructure Strategy.	Nil
	SAPS	Overview of Bruny Island Specific Area Plan and Bonnet Hill and Blackmans Bay Bluff Specific Area review report and recommendations	Nil

6 DECLARATIONS OF INTEREST

In accordance with Regulation 10 of the *Local Government (Meeting Procedures) Regulations 2025* and Council's adopted Code of Conduct, the Mayor requests Councillors to indicate whether they have, or are likely to have, a pecuniary interest (any pecuniary benefits or pecuniary detriment) or conflict of interest in any item on the Agenda.

7 TRANSFER OF AGENDA ITEMS

Are there any items, which the meeting believes, should be transferred from this agenda to the closed agenda or from the closed agenda to the open agenda, in accordance with the procedures allowed under Section 15 of the *Local Government (Meeting Procedures) Regulations 2025*.

Council has determined that questions on notice or questions taken on notice from a previous meeting should not contain lengthy preambles or embellishments and should consist of a question only. To this end, Council reserves the right to edit questions for brevity so as to table the question only, with some context if need be, for clarity.

8 QUESTIONS WITHOUT NOTICE FROM THE PUBLIC

9 QUESTIONS ON NOTICE FROM THE PUBLIC

9.1 Browns River

Mrs Jo Westwood submitted the following question on notice:

Does Council have a specific Browns River Catchment Management Plan? What work has Council undertaken at Browns River in recent years to improve water quality in the river and at Kingston Beach?

Officer's Response:

Catchment Plan:

Council does not have a current catchment management plan for Browns River. The most recent plan was completed in 2003. It provided an overview of the catchment, assessed water quality, identified

management issues and made recommendations. Council delivered those recommendations through a range of projects and initiatives over the following decade.

Browns River Water Quality:

Recreational water quality has been monitored at a site in the lower estuary of Browns River since 1994. The site is below the pedestrian bridge where the river meets Kingston Beach. Monitoring checks compliance with the National Guidelines for Recreational Waters. Due to poor long term monitoring results, the site is deemed an environmental site, not a swimming site. This means it is considered suitable for secondary contact activities, such as kayaking, but not for swimming.

Monitoring of creek water quality has been coordinated by the Derwent Estuary Program and has occurred in 2005, 2010 and 2025. Urban catchments, such as Browns River, which receive stormwater from built up areas and surrounding industrial areas show the highest pollutant levels. The monitoring assesses a suite of water quality indicators including nitrogen, phosphorous, turbidity and bacteria.

Whilst many sites across the Derwent Estuary do not meet national and state water quality guidelines, the levels of nitrogen and phosphorous at the Browns River monitoring site are below national guidelines and have declined since 2005. In contrast, the levels of bacteria (enterococci) at the Browns River sites are poor. Enterococci is a microbial indicator used to assess the presence of faecal contamination and potential public health risks.

Stormwater is a significant contributor to poor water quality in Browns River and Kingston Beach as it carries pollutants from further up the catchment into local creeks and rivers and ultimately into marine waters.

Work to improve water quality:

- **Kingston Stormwater Wetlands** - The major initiative to improve water quality in Browns River and, ultimately, at Kingston Beach was the construction of the Kingston Stormwater Wetlands in 2000. Stormwater from central Kingston is redirected through the artificial wetland system before entering Whitewater Creek and Browns River. As water flows through a series of ponds and wetlands, bacteria and other contaminants are exposed to natural treatment processes. The wetlands significantly reduce contamination entering Browns River from central Kingston.
- **Stormwater investigations and upgrades** - As part of Council's stormwater investigation and upgrade program, officers investigate sites where public or private sewer systems are failing and leaking into Browns River and its tributaries. This work has been ongoing since the mid-1990s. Upgrades to the stormwater network, such as gross pollutant traps, bioretention basins and rain gardens, also improve water quality.
- **Creek Maintenance Plans** - In 2022 Creek Maintenance Plans were developed for urban rivulets, including a plan for Whitewater Creek which flows into Browns River. The plan guides management actions to improve riparian health, water quality and flow.
- **Riparian Corridor Management** - Council has been improving the health of riparian reserves, including along Whitewater Creek, Browns River and connecting creek lines, for more than 20 years, with support from Landcare groups and the community. Activities include weed and litter removal, revegetation of riparian corridors, habitat restoration and erosion management.
- **Development controls** – Through the development approvals process, Council considers the potential impacts of development on waterways and water quality. The public open space corridor within Spring Farm Estate is an example of a subdivision design that supports improved water quality in Whitewater Creek.

Liz Quinn, Manager Environmental Services

9.2 Gallaghers Road

At the Council meeting on 20 July 2026, **Ms Kim Phillips** asked the following question without notice to the Chief Executive Officer, with a response that the question would be taken on notice:

I've had a local resident share an email with me and asked me to follow up for them. The last email they have is from 18 August in 2025, where there's an issue with the top section of Gallaghers Road where the turning circle has collapsed down into the drain, making it difficult for council equipment to get out there to perform any maintenance work. Where are we at with that please because they were told that they would have some update on what was happening and have not since?

Officer's Response:

The upper section of Gallaghers Road has not been graded for several years because collapse of the bank within the turning area has prevented the safe turning of heavy plant, including the grader and trucks required to undertake grading works.

The resident was advised in 2025 that Council was investigating options to address the turning area and that a further update would be provided. Unfortunately, that follow-up communication did not occur and Council apologises for this oversight.

The road was inspected on 27 July 2026. Although it has not been graded for more than three years, the running surface is generally in good condition. One significant water rut was identified. However, the road remains accessible and is not considered to present a safety concern.

Council has drainage maintenance scheduled in the area within the next six weeks, subject to operational priorities. While undertaking these works, Council will clean the table drains, place material into the water rut and tidy the turning area where it can be undertaken safely. Major reconstruction of the turning area is not proposed at this stage due to the instability of the site and the limited operational benefit.

Future maintenance of the upper section of Gallaghers Road will be undertaken using smaller plant or localised repairs where intervention levels are reached, rather than by full grading. Council will continue to monitor the condition of the road and undertake maintenance in accordance with its safety and service requirements.

Renai Clark, Senior Roads Engineer

9.3 TPC Hearings

At the Council meeting on 20 July 2026, **Ms Alison Rogers** asked the following question without notice to the Chief Executive Officer, with a response that the question would be taken on notice:

Given that further strategic review of zoning and land use is going to be done around zoning and land use, will landowners incur a cost in terms of if they are going to apply for a change of zone? So if we say theoretically this landowner may be zoned rural, for example, in this current LPS, and they then want to query that and ask for a rural living consideration will that come at a cost to the landowner itself going through that process, or are Council going to take into consideration the fact that this perhaps should have taken place simultaneously with this current draft LPS?

Officer's Response:

The answer to the question is not entirely straightforward, as it will depend on the nature and outcomes of the future strategic planning work.

In some cases, Council may undertake strategic reviews of zoning and land use that identify a broader need for planning scheme changes across an area. Where Council determines that a planning scheme amendment is warranted to implement the strategic outcomes of that work, Council

may choose to initiate and progress those amendments itself. In other cases, the strategic work may identify opportunities or provide a policy basis for different land use outcomes, but individual landowners may still need to pursue a planning scheme amendment if they are seeking a specific zoning change for their property. In those circumstances, the normal amendment processes and associated costs may apply.

It is also important to note that planning schemes are intended to evolve over time. Legislative requirements oblige councils to periodically review their planning schemes, and those reviews, together with other strategic planning projects, may lead to further amendments as community needs, growth patterns, infrastructure planning and state policy settings change.

Therefore, it would be premature to give a definitive answer on whether a particular landowner would incur costs associated with a future rezoning request. That will depend on whether the desired zoning outcome is ultimately progressed through a Council-initiated strategic planning process, or whether it is a matter that would need to be pursued by the landowner through a separate amendment request.

Adriaan Stander, Lead Strategic Planner

10 QUESTIONS WITHOUT NOTICE FROM COUNCILLORS

11 QUESTIONS ON NOTICE FROM COUNCILLORS

At the time the Agenda was compiled there were no Questions on Notice from Councillors.

12 PETITIONS STILL BEING ACTIONED

There are no petitions still being actioned.

13 PETITIONS RECEIVED IN LAST PERIOD

At the time the Agenda was compiled no Petitions had been received.

14 OFFICERS REPORTS TO COUNCIL

14.1 REVIEW OF THE BONNET HILL AND BRUNY ISLAND SPECIFIC AREA PLANS

File Number: 17.228, 17.300

Author: Deleeze Chetcuti, Director Environment, Development & Community Services

Authoriser: Dave Stewart, Chief Executive Officer

Strategic Plan Reference

Key Priority Area: 2. Growing together with well-planned spaces and infrastructure.

Strategic Outcome: 2.2 Embedded and contemporary land use planning systems to manage the current and future impacts of development.

1. PURPOSE

- 1.1 At its meeting of 20 October 2025, Council resolved to appoint an independent planning consultant to undertake a review of the application of the Bruny Island Specific Area Plan (SAP) as well as the Blackmans Bay Bluff and Bonnet Hill SAP in response to concerns raised by members of the public during the Local Provisions Schedule (LPS) hearings.
- 1.2 The purpose of this report is for the Planning Authority to consider the outcomes of the review undertaken by Pitt & Sherry and subject to its endorsement to approve the submission of the review's findings to the Tasmanian Planning Commission (TPC) for consideration as part of the ongoing Local Provisions Schedule (LPS) hearings and before a final decision is made by them.

2. BACKGROUND

- 2.1 The Tasmanian Planning Scheme (TPS) was introduced by the State Government to provide a consistent, contemporary and coordinated planning system across Tasmania, replacing the individual planning schemes previously administered by each council. Under this reform, every council is required to prepare a draft LPS to apply the State Planning Provisions (SPPs) at a local level.
- 2.2 A SAP is a local planning mechanism within the TPS that forms part of a council's LPS. It operates in addition to the SPPs and may add to, modify or substitute provisions that would otherwise apply under the underlying zone or zones for a defined area. They are a well-established feature of LPSs across Tasmania, with most councils including multiple SAPs, commonly in the order of approximately five to ten, and some councils applying up to around twenty SAPs for a range of purposes including heritage, settlement character, infrastructure, environmental, landscape, tourism and activity centre outcomes.
- 2.3 When Council lodged its draft LPS in February 2020, approaches to zone translation and the application of local planning provisions (including SAPs) were still evolving at a statewide level.
- 2.4 The 2020 version of the draft LPS included several SAPs, comprising a combination of existing SAPs carried over from the Kingborough Interim Planning Scheme 2015 (KIPS2015) and new SAPs introduced as part of the transition to the TPS.
- 2.5 The proposed new SAPs were intended to address locations with distinct environmental, social, spatial or hazard-related characteristics not adequately managed through standard provisions alone. These included SAPs to maintain established low-density residential character and landscape values at Blackmans Bay Bluff, Burwood Drive, Coningham and

Lower Snug, Kettering and Dennes Point. The justification for these SAPs was provided within the 2019 draft LPS Supporting Report.

- 2.6 During the post-lodgement phase, the TPC indicated that it did not support the proposed new SAPs in the format they were presented. However, the TPC allowed Council to reconsider its approach to the proposed SAPs, during which the potential introduction of a SAP for Bruny Island was identified as a matter for further consideration. It was also suggested that the Blackmans Bay Bluff SAP be revised to include Bonnet Hill, which at that time had been proposed for rezoning to the Landscape Conservation Zone (LCZ).
- 2.7 After several post-lodgement conferences, the TPC directed Council to revise the draft LPS and publicly exhibit the revised version in 2024. The revised draft included a Bruny Island SAP and a combined Blackmans Bay Bluff and Bonnet Hill SAP. Detailed justification for these SAPs was provided in the 2024 LPS Supporting Documentation exhibited alongside the draft LPS.
- 2.8 The public exhibition of the 2024 draft LPS generated significant community interest, particularly in relation to the Bruny Island SAP.
- 2.9 In response to matters raised through representations, Council indicated in its section 35F report that it was open to considering changes to the SAPs, while expressing a preference to explore the issues in detail through the LPS hearing process. To support those discussions, Council included comparison tables for each SAP in the s35F report submitted to the TPC, that demonstrated the differences between the controls under KIPS2015 and those proposed under the SPPs and the proposed SAPs.
- 2.10 To date, SAP-specific hearings have been limited to the Kingston Southern Gateway SAP, the Bonnet Hill component of the Blackmans Bay Bluff and Bonnet Hill SAP, and the Gordon and Kettering Precincts of the Kingborough Coastal Settlement SAP.
- 2.11 Following discussions and the exchange of information at the hearings, the TPC issued directions in relation to the Burwood Drive SAP and Kingborough Coastal Settlement SAP, seeking advice on any potential modifications, and the Kingston Southern Gateway SAP, seeking advice on whether the Planning Authority intended to proceed with the SAP.
- 2.12 The Planning Authority subsequently advised that it has decided not to proceed with the Kingston Southern Gateway SAP. The rationale for this decision is set out in its submission, which has been published on the [Commission's website](#). The Planning Authority's response to the Burwood Drive SAP and Kingborough Coastal Settlement SAP directions will be provided later and will address the matters that the TPC identified during the hearings as requiring further consideration.

3. COUNCIL'S DECISION TO UNDERTAKE A REVIEW OF COMPONENTS OF THE DRAFT LPS

- 3.1 Council resolved on 20 October 2025 to commission a comprehensive independent review of:
 - (a) the Landscape Conservation Zone (LCZ) in the draft LPS; and
 - (b) the Bonnet Hill component of the Blackmans Bay Bluff and Bonnet Hill SAP, as well as the Bruny Island SAP.
- 3.2 The LCZ review was subsequently undertaken by Irene Inc Planning & Urban Design and endorsed by the Planning Authority on 16 March 2026 and submitted to the TPC.
- 3.3 The SAP review component was undertaken by Pitt & Sherry, with the outcomes of that review presented in this report.

4. OVERVIEW OF THE REVIEW BY PITT & SHERRY

- 4.1 The review by Pitt & Sherry (refer to Attachments) provides an independent, systematic assessment of the Bruny Island SAP (KINS6.0) and the Blackmans Bay Bluff & Bonnet Hill SAP (KINS7.0), focusing on:
- strategic justification of the SAP having regard to the statutory compliance with the *Land Use Planning and Approvals Act 1993* (LUPAA) and alignment with the *Southern Tasmania Regional Land Use Strategy* (STRLUS);
 - evaluation of public and stakeholder representations received during the LPS exhibition period;
 - outcomes from targeted engagement to inform the review, including a survey of affected landowners within the SAP areas and discussions with key community organisations such as the Bonnet Hill Community Association, Bruny Island Community Association, Bruny Island Environment Network, Friends of North Bruny, and the weetaipoona Aboriginal Corporation.
 - assessment of whether SAP provisions are necessary, proportionate, clear and administrable; and
 - identification of drafting, mapping and structural defects requiring correction or improvements.

Key findings and recommendations

- 4.2 The review confirms that there is strategic justification for the Bruny Island SAP and the Bonnet Hill component of the Blackmans Bay Bluff and Bonnet Hill SAP. Each addresses local planning risks that are not adequately managed through the standard provisions of the TPS. The review indicates that the Bruny Island SAP is justified due to the combination of, significant infrastructure constraints, tourism pressure, cumulative development impacts and environmental sensitivity which together create planning challenges that cannot be effectively addressed through the SPPs alone. It further finds that, without locally calibrated controls, there is a risk of inappropriate intensification outside the Urban Growth Boundary (UGB) that would be inconsistent with the STRLUS.
- 4.3 Similarly, the Bonnet Hill SAP is supported based on its high landscape and visual sensitivity, natural values, and exposure to cumulative development impacts. The review identifies that these characteristics, in combination with the area's location outside the UGB, give rise to a need for targeted controls to manage development intensity and maintain landscape character, consistent with the strategic intent of the STRLUS.
- 4.4 The Pitt & Sherry review found that the Blackmans Bay Bluff component of SAP is not supported in its current extent and form and that the available evidence does not demonstrate that the SAP is necessary, proportionate or sufficiently linked to the planning risks relied upon in support of the controls. While Pitt & Sherry acknowledge that matters such as landscape sensitivity, vegetation retention, built form and development intensity may warrant further consideration, they recommend that any additional controls be supported by further technical and strategic work and be limited to clearly justified matters and locations.
- 4.5 The Blackmans Bay Bluff component was developed during a period of uncertainty regarding the nature and extent of future development within the area. As the area has now been substantially developed, the original strategic justification for applying the SAP has diminished. When considered alongside the lack of evidence demonstrating that the current controls remain necessary or proportionate, there is limited justification for retaining the Blackmans Bay Bluff component.

- 4.6 Finally, the review recommends that the Bruny Island SAP and the Bonnet Hill component of the Blackmans Bay Bluff and Bonnet Hill SAP be modified and, where appropriate, simplified to improve clarity, proportionality and statutory robustness, as outlined further below.
- 4.7 These modifications are required to address identified drafting, mapping and proportionality issues, while also establishing a clear pathway for staged refinement over time. For example, while the review identifies the preparation of a Bruny Island Structure Plan and a transition to a precinct-based framework as key improvements, it recognises that this work would be more appropriately undertaken following implementation of the LPS, allowing the SAP to operate as an interim mechanism in the short term and to be progressively refined as more detailed strategic planning is completed.

5. PROPOSED MODIFICATIONS

- 5.1 The review does not include detailed clause-level drafting recommendations. Accordingly, modifications to the Bonnet Hill SAP and Bruny Island SAP have been prepared having regard to the recommendations of Pitt & Sherry. These modifications are proposed to be submitted to the TPC, subject to endorsement by the Planning Authority.
- 5.2 It should be noted that the proposed modifications to the SAPs extend beyond the recommendations provided by Pitt & Sherry. These additional changes relate to matters where it is considered appropriate to simplify the SAP provisions, defer and reconsider issues as part of a future review, or matters that may benefit from more detailed consultation.
- 5.3 The overall approach has been to maintain provisions that are, where possible, consistent with, or more flexible than, the outcomes available under the current the KIPS. However, a limited number of additional provisions are proposed, particularly within the Bruny Island SAP. These provisions, including those relating to Swift Parrot collision risk, are considered justified and appropriate having regard to the local and regional importance of the environmental values and circumstances of Bruny Island
- 5.4 Consistent with other hearings and assessment processes, the SAP provisions as modified may be subject to further scrutiny by the TPC, including consideration of their strategic justification, the appropriateness of the proposed modifications, and whether the SAPs should be retained, refined or removed.
- 5.5 A detailed summary of the modifications made to the SAP, together with supporting justification, track changes and the proposed final drafting, is provided in the accompanying attachments. A high-level overview of the modifications is provided below.

Bonnet Hill SAP

- 5.6 Having regard to the recommendations of Pitt & Sherry not to proceed with the Blackmans Bay Bluff component of the Blackmans Bay Bluff and Bonnet Hill SAP, that component has been removed from the SAP. Consequently, the SAP has been amended to apply only to Bonnet Hill.
- 5.7 The Bonnet Hill SAP has been modified with a focus on improving its clarity, usability and alignment with its primary purpose. This includes simplifying provisions, reducing unnecessary complexity and, in some instances, providing greater flexibility, particularly in relation to subdivision, while continuing to achieve the intended planning outcomes.
- 5.8 Editorial amendments have also been made to remove duplication, including the rationalisation of vegetation-related provisions that were repeated across multiple standards.
- 5.9 In addition, provisions considered to provide limited planning benefit, or which were not directly related to the primary purpose of the SAP, have been removed, enabling the SAP

to focus more clearly on the matters that are fundamental to achieving the desired outcomes for Bonnet Hill and assist in the transition to the TPS.

5.10 The modified SAP provides the following provisions:

- *KIN-S7.7.1 Building Height in the Low Density Residential Zone in Bonnet Hill*

This control applies only to three 3 lots and seeks to protect the visual landscape character of Bonnet Hill when viewed from Kingston and Kingston Beach. The control effectively carries forward the existing building height restriction from the KIPS2015 by retaining a preferred maximum building height of 5m, while allowing flexibility through a performance-based assessment.

- *KIN-S7.7.2 On-site Waste Water Treatment in Bonnet Hill*

This control applies to only a part of Bonnet Hill where on-site wastewater management is required and seeks to ensure development can be adequately serviced without adverse environmental impacts. The provisions are generally consistent with the approach under KIPS2015.

- *KIN-S7.7.3 Prominent Trees in Bonnet Hill*

This control applies across the SAP area and seeks to minimise the impact or loss of prominent trees that contribute to the amenity and landscape setting of Bonnet Hill. The acceptable solution requires buildings and works to avoid tree protection zones, while the performance criteria provide flexibility having regard to the maturity and landscape contribution of trees, bushfire protection requirements, mitigation or revegetation measures, site landscaping and practical design alternatives. The provisions adopt an approach that is consistent with prominent tree protection controls used in other LPSs under the TPS.

- *KIN-S7.8.1 Lot Design for CT 38873/1, CT 138873/2 and CT 138873/3*

This control applies only to the three lots identified above and seeks to ensure lots are capable of accommodating development while maintaining the landscape setting of Bonnet Hill. The control establishes a preferred minimum lot size of 3,000m², but allows lots as small as 1,500m² through the performance pathway, which is generally consistent with the minimum lot size contemplated by the state planning provisions where suitable site and design outcomes can be demonstrated. This represents a substantially more flexible approach than KIPS2015, under which the broader Bonnet Hill precinct was generally subject to a 5,000m² minimum lot size, while still ensuring that landscape and development constraints specific to the locality can be appropriately considered

Bruny Island SAP

5.11 The Bruny Island SAP has been modified and simplified to provide a stronger foundation for a locally responsive planning framework that can evolve over time as the needs, aspirations and circumstances of the Bruny Island community change.

5.12 Modifications have been made to remove duplication and improve readability, including the rationalisation of vegetation-related provisions that were previously repeated across multiple standards. In addition, provisions considered to provide limited planning benefit, or which were not directly related to the primary purpose of the SAP, have been removed. In some instances, provisions have been simplified or deferred on the basis that the relevant matters are more appropriately addressed through the standard provisions of the TPS in the short term, with further consideration to be given through future strategic planning work and consultation with the Bruny Island community. This approach allows

the SAP to focus on the matters that are most important to achieve its intended outcomes as part of the transition process.

5.13 While substantial work has been undertaken to support a more comprehensive, island-wide approach to the management and protection of natural values, the modified SAP limits those provisions to zones where the standard provisions of the TPS are unable to adequately address the relevant issues. This includes the application of additional provisions in parts of the Low-Density Residential Zone and Agriculture Zone where current controls for priority vegetation management will not continue to apply under the TPS. This approach generally maintains the status-quo and then provides opportunity for more detail strategic planning work more comprehensive measures if assessed to be necessary in the future.

5.14 The modified SAP provides the following provisions:

- *KIN-S6.7.1 Residential Density for Multiple Dwellings in the Low Density Residential Zone*

This controls seeks to ensure multiple dwelling development requires a preferred site area of 2,500m² per dwelling, while providing flexibility through performance criteria to allow smaller site areas (as small as 1,500 m²) where infrastructure capacity, servicing and settlement pattern considerations can be satisfactorily addressed. The 1,500m² performance standard is broadly aligned with the approach of the standard provisions of the TPS and represents a significantly more flexible outcome than KIPS2015, which did not provide a pathway for multiple dwellings within the Low Density Residential Zone on Bruny Island

- *KIN-S6.7.2 On-site Waste Water Management in the Low Density Residential Zone*

This control applies only within the Low Density Residential Zone seeks to ensure sites are capable of accommodating an appropriate wastewater disposal system. The provisions are generally consistent with KIPS2015.

- *KIN-S6.7.3 Building Height and Exterior Finishes in Apollo Bay*

Applies only to the Rural Living Zone land within the Apollo Bay Building Design Area and seeks to protect local landscape values and ensure built form remains subordinate to the natural landscape. The control establishes a preferred maximum building height of 6 m, together with siting and exterior finish requirements, while allowing flexibility through performance criteria where landscape impacts can be appropriately managed. The height limit is less restrictive than the 5m limit that applied under KIPS2015, while the exterior finish requirements are broadly consistent with those previously applied to the land under KIPS2015.

- *KIN-S6.7.4 Priority Vegetation in the Low Density Residential Zone and Agriculture Zone*

The provisions are generally consistent with the Natural Assets Code, adopting a similar assessment framework and considerations for the clearance of priority vegetation. This approach maintains broad consistency with the application of the Natural Assets Code elsewhere on the island.

It should be noted that references to the *Kingborough Biodiversity Offset Policy* have been removed from the modified SAP. While biodiversity offsets may have merit as a mechanism for addressing residual impacts on environmental values, it is considered inappropriate to provide for the application of the *Kingborough Biodiversity Offset Policy* only within the Low Density Residential Zone and Agriculture Zone, but not across other zones on Bruny Island where comparable biodiversity values may occur. In addition, the Policy does not align neatly with TPS

framework, as it provides for offsetting on other land and monetary contributions, mechanisms that are not generally contemplated by the Tasmanian Planning Scheme.

Given the simplified and interim nature of the modified SAP, it is considered preferable to defer consideration of an offset framework in the SAP until a consistent island-wide approach can be developed through future strategic planning work and consultation with the community and relevant stakeholders.

- *KIN-S6.7.5 Swift Parrot Collision Risk*

This control seeks to minimise the risk of collision, injury and mortality to the Swift Parrot. The provisions have been significantly refined and simplified from the previously exhibited version of the SAP and now provide clearer guidance on bird-safe building design measures, including the treatment of glazing and transparent structures, while allowing alternative solutions through performance criteria supported by expert advice and recognised bird-safe design guidance. Unlike the previous version of the SAP, the modified provisions also provide greater direction on how design responses can be used to reduce collision risk whilst still accommodating development.

This is the only substantive development control proposed within the modified SAP that does not have a direct equivalent under KIPS 2015. However, there is considered to be sound strategic justification for its inclusion given Bruny Island's importance as habitat for the Swift Parrot and the identified risk posed by bird strike. Further detail regarding the justification for the provision is provided in the supporting documentation accompanying the modified SAP.

- *KIN-S6.8.1 Lot Design in the Low Density Residential Zone*

This control establishes a preferred minimum lot size of 2,500m² in the Low Density Residential Zone, but allows lots as small as 1,500m² through the performance pathway where it can be demonstrated that the subdivision is consistent with the existing development pattern in the area and that the proposed lots can be appropriately serviced. In assessing a smaller lot size, consideration is given to matters such as the availability of reticulated infrastructure, the ability to provide adequate on-site wastewater disposal and water supply, site constraints and the intended use of the land. The provisions are not more onerous than those that operated under KIPS 2015.

- *KIN-S6.8.2 Subdivision in the Agriculture Zone*

This control seeks to minimise adverse impacts on priority vegetation associated with subdivision works. Rather than imposing additional lot design standards, the control largely relies on the standard Agriculture Zone provisions and introduces an additional assessment of priority vegetation impacts, enabling the use of the Agriculture Zone while addressing a gap identified in the State Planning Provisions.

5.15 The modified SAP is intended to provide the minimum suite of place-based provisions necessary to support the transition of Bruny Island into the Tasmanian Planning Scheme, while generally maintaining outcomes that are comparable to those currently achieved under KIPS2015. This approach recognises that a number of planning issues on Bruny Island, particularly those relating to landscape, environmental values, settlement character and infrastructure capacity, would benefit from further strategic planning, technical investigation and consultation with the Bruny Island community before more detailed controls are introduced.

5.16 While there is a risk that some locally specific matters may not be addressed as comprehensively in the short term through reliance on the standard provisions, this is

considered an appropriate interim position that provides a clear and workable planning framework, avoids unnecessary complexity, and establishes a holding point from which more refined place-based provisions can be developed through future strategic planning work and consultation.

6. STATUTORY REQUIREMENTS

- 6.1 The review sits outside the formal statutory processes prescribed by LUPAA and has been prepared to assist Council in presenting a robust, defensible and transparent position during the LPS hearing process.
- 6.2 Final decisions regarding modification or refusal of the SAPs will remain the responsibility of the TPC, acting under the statutory criteria set out in LUPAA, the SPPs and the STRLUS.

7. FINANCE

- 7.1 The review has been completed within Council's existing operational budget.

8. ENVIRONMENT

- 8.1 If the approach in the report by Pitt and Sherry is supported by Council and the TPC, the refined SAP framework will continue to deliver strong environmental protection outcomes by targeting controls to areas of genuine ecological and landscape sensitivity.
- 8.2 Conversely, if the SAPs do not proceed, there is a risk that these place-based controls will be lost, resulting in a reduced ability to manage cumulative impacts, leading to a reduced ability to consider of environmental and landscape values for future development and a greater reliance on broader, less tailored planning provisions.

9. COMMUNICATION AND CONSULTATION

- 9.1 No additional formal public consultation has been undertaken specifically for this review. However, Council undertook targeted engagement with affected landowners within the SAP areas, including a survey, and convened meetings with representatives of key community organisations. These included, but were not limited to, the Bonnet Hill Community Association, Bruny Island Community Association, Bruny Island Environment Network, Friends of North Bruny, and the weetaipoona Aboriginal Corporation.
- 9.2 Representations received during the formal exhibition of the draft LPS have also informed the preparation of this review and its recommendations and will continue to inform the TPC's assessment prior to its determination.
- 9.3 The data and information from the additional engagement undertaken by Council is not considered as formal representations, however it was analysed and informed the Pitt & Sherry review, and the raw data is attached to the review report – which, if endorsed, will be submitted to the TPC.
- 9.4 The TPC will consider all representations in accordance with its statutory responsibilities. Where appropriate, it may determine that further engagement is required, either by directing Council to undertake additional consultation with affected landowners or by undertaking such consultation itself. Any such action is at the discretion of the Commission and would occur only where it considers further input necessary before finalising the LPS.

10. RISK

- 10.1 In considering the proposed modifications to the Bruny Island SAP and Bonnet Hill SAP contained in the attachments, and the recommendation not to proceed with the Blackmans Bay Bluff component of the SAP, the Planning Authority should have regard to

a range of statutory, governance, implementation and reputational risks. The proposed amendments have been prepared by officers in response to the findings and recommendations of the independent review undertaken by Pitt & Sherry and are intended to address identified drafting, mapping and proportionality issues while retaining planning controls where there is a demonstrated strategic justification for doing so.

- 10.2 The proposed modifications seek to reduce the risk of the SAPs containing provisions that are unnecessarily complex, difficult to administer, or vulnerable to challenge through the assessment and appeal process. By addressing identified issues and removing elements of the SAPs (particularly those elements that do not have strong merit) the modified SAPs aim to provide a clearer, more practical and defensible planning framework for consideration by the TPC.
- 10.3 The SAPs have attracted significant community interest throughout the LPS process, particularly in relation to Bruny Island, Bonnet Hill and Blackmans Bay Bluff. A substantial number of representations were received during exhibition, and some representors have subsequently participated in the hearing process. Consequently, there is a reputational risk for Council if concerns raised through representations, hearings and subsequent engagement are perceived as not having been adequately considered.
- 10.4 Equally, amendments to the SAPs, including the removal of the Blackmans Bay Bluff component, may not align with the expectations of all stakeholders and may attract both support and criticism from different sections of the community.
- 10.5 The proposed modifications seek to manage these risks by demonstrating that Council has actively considered matters raised by representors, commissioned an independent review to test those concerns, undertaken further targeted engagement and a detailed assessment of the SAP provisions. This provides a transparent and evidence-based basis for Council's position and supports public confidence in the integrity of the review process.
- 10.6 There is also a strategic and governance risk associated with either retaining planning controls that cannot be clearly justified or removing controls that continue to serve a valid planning purpose. In this regard, the review concluded that the original strategic justification for the Blackmans Bay Bluff component has diminished as the area has largely been developed and therefore supports its removal. Conversely, the review found that there remains a strategic basis for place-based planning controls within Bonnet Hill and Bruny Island, albeit in a modified and simplified form. A position that is inconsistent with these findings may be perceived by some stakeholders as not appropriately responding to the evidence presented through the review process.
- 10.7 There is also a risk associated with the SAPs not proceeding, either as a result of a decision by the Planning Authority or through the TPC's assessment process. While the review concluded that the Blackmans Bay Bluff component is no longer justified, it found that place-based planning controls remain warranted in Bonnet Hill and Bruny Island. If those SAPs do not proceed, local environmental, landscape, settlement and infrastructure considerations would need to be addressed through the standard provisions of the TPS, which may not provide the same degree of locational specificity. This could result in planning outcomes that are not anticipated by the regional policies of the STRLUS, particularly in relation to development intensity, settlement patterns and the management of cumulative impacts on infrastructure and to sensitive locations.
- 10.8 While differing views amongst landowners, community groups and representors are likely to remain regardless of the outcome, progressing modifications informed by an independent review places Council in a stronger position to demonstrate that its response has been guided by strategic planning merit, evidence and community feedback rather than any single interest or viewpoint.

- 10.9 Notwithstanding the proposed modifications, the final determination regarding the merit, form and justification of the SAPs remains a matter for the TPC as part of its assessment of the LPS.

11. CONCLUSION

- 11.1 With the exception of the Blackmans Bay Bluff component of the Blackmans Bay Bluff and Bonnet Hill SAP, the review undertaken by Pitt & Sherry concludes that there is a strategic justification for the retention of the relevant SAPs and identifies a range of modifications to improve their clarity, operation, proportionality and statutory robustness
- 11.2 Notwithstanding the findings of the Pitt & Sherry review and the draft modifications proposed, the TPC will independently assess the strategic merit and justification of the SAPs as part of its consideration of the LPS.
- 11.3 This process will include consideration of representations and evidence presented through the hearing process and may ultimately result in the SAPs being retained, modified or removed.

12. RECOMMENDATION

That the Planning Authority:

- (a) Receives the report titled *Expert Review – Bruny Island Specific Area Plan (KINS6.0) and the Blackmans Bay Bluff & Bonnet Hill Specific Area Plan (KINS7.0)* prepared by Pitt & Sherry and notes its findings.
- (b) Endorses the modifications set out in the attachments to this report as the Planning Authority's position on the SAPs for the purposes of the ongoing Local Provisions Schedule (LPS) hearings.
- (c) Provides the Pitt & Sherry review and the modified SAPs contained in the attachments to the Tasmanian Planning Commission for consideration as part of its assessment of the LPS.

ATTACHMENTS

- 1. Review by Pitt & Sherry
- 2. Explanation of modifications made to the Bonnet Hill SAP
- 3. Justification for the modified Bonnet Hill SAP
- 4. Modified Bonnet Hill SAP (with track changes)
- 5. Modified Bonnet Hill SAP (clean)
- 6. Explanation of modifications made to the Bruny Island SAP
- 7. Justification for the modified Bruny Island SAP
- 8. Modified Bruny Island SAP (with track changes)
- 9. Modified Bruny Island SAP (clean)
- 10. Public survey report

pitt&sherry



Expert Review

Bruny Island Specific Area Plan (KIN S6.0) and the Blackmans Bay Bluff & Bonnet Hill Specific Area Plan (KIN S7.0)

Prepared for
Kingborough Council

Client representative
Deleeze Chetcuti

Date
24 July 2026



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Reviewed by – Colin Davis		Date – 23 July 2026
Authorised by – Trent Henderson		Date – 24 July 2026

Revision History					
Rev No.	Description	Prepared by	Reviewed by	Authorised by	Date
RevA	Initial Internal Draft	TH	CD	TH	08.04.26
RevB	Draft for client release	TH	CD	TH	29.05.26
00	Report issued to client	TH & KH	CD & KH	TH	09.07.26
01	Report Issued to client	TH & KH	CD & KH	TH	23.07.26

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Definitions & Acronyms

Acronym / Term	Definition
BICA	Bruny Island Community Association
BIEN	Bruny Island Environment Network
Cumulative impact	The combined effect of a series of individually minor changes which, over time, may result in a significant planning, environmental or infrastructure outcome
Development Intensity	The scale, density or extent of use and development occurring on a site or within an area
Direction 78	Direction issued by the Tasmanian Planning Commission requiring further review and justification of aspects of the Kingborough Local Provisions Schedule
EPBC	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth)
FONB	Friends of North Bruny
Infrastructure Capacity	The ability of physical infrastructure and services, including wastewater, roads, transport and utilities, to accommodate additional development
KINS6.0	Bruny Island Specific Area Plan
KINS7.0	Blackmans Bay Bluff and Bonnet Hill Specific Area Plan
KIPS 2015	Kingborough Interim Planning Scheme 2015
Landscape sensitivity	The degree to which a landscape is susceptible to change arising from use or development without adverse impacts on its character or visual qualities
LIST	Land Information System Tasmania
Local Area Objective	A statement within a Local Provisions Schedule identifying planning outcomes sought for a particular locality
LPS	Local Provisions Schedule
LUPAA	<i>Land Use Planning and Approvals Act 1993</i>
Natural Assets Code	State Planning Code addressing biodiversity, native vegetation, waterways, wetlands and geoconservation values
Natural Values	Environmental features including native vegetation, threatened species habitat, geoconservation values, waterways and wetlands
NVA	Natural Values Atlas - Tasmanian Government database containing records of natural values, threatened species and ecological communities
OIN	Outstanding Issues Notice - notice issued by the Tasmanian Planning Commission identifying matters requiring further consideration before certification of an LPS
Place-based controls	Planning provisions tailored to the specific characteristics, values and constraints of a defined location
Place-based planning	A planning approach that responds to the specific environmental, social, economic and spatial characteristics of a location
Precautionary planning	A planning approach that recognises uncertainty and seeks to avoid environmental degradation where there is a risk of serious or irreversible harm
Precinct-based approach	A planning approach that applies different provisions within identified sub-areas based on differing characteristics, constraints or planning objectives
Proportionality	The principle that planning controls should be commensurate with the planning risk they are intended to manage
RMPS	Resource Management and Planning System of Tasmania
SAP	Specific Area Plan
SETAC	South East Tasmanian Aboriginal Corporation
Spatial differentiation	The application of different planning responses to different locations based on identified characteristics, constraints or planning risks
Spatial targeting	The application of planning controls only where identified planning risks or values occur



SPPs	State Planning Provisions
Strategic merit	The degree to which a planning control is supported by evidence, strategic planning objectives and statutory requirements
STRLUS	Southern Tasmania Regional Land Use Strategy 2010–2035
TASVEG	Tasmania's statewide native vegetation mapping dataset
TPC	Tasmanian Planning Commission
TPS	Tasmanian Planning Scheme
UGB	Urban Growth Boundary
Viewshed	An area that is visible from a particular public location or viewing point
Visual sensitivity	The susceptibility of a location to changes in views or visual character arising from development
Wastewater intensification	An increase in wastewater generation resulting from additional development, increased occupancy or more intensive land use
Working landscape	Rural or agricultural land that continues to support productive activities alongside environmental and scenic values



Executive Summary

pitt&sherry has been engaged by Kingborough Council to provide an independent planning review and assessment of the Bruny Island Specific Area Plan (KINS6.0) and the Blackmans Bay Bluff and Bonnet Hill Specific Area Plan (KINS7.0). Both SAPs form part of the Local Provisions Schedule (LPS) to the Tasmanian Planning Scheme (TPS).

This report has been prepared to assist the Planning Authority in responding to Direction 78 of the Tasmanian Planning Commission and the associated Outstanding Issues Notice (OIN) issued under section 35F of the *Land Use Planning and Approvals Act 1993* (LUPAA). Direction 78 requires the Planning Authority to clarify drafting intent, address deficiencies in mapping, definitions and assessment triggers, and demonstrate that the SAPs operate transparently, proportionately and consistently with the structure and purpose of the TPS.

The review considers whether each SAP remains justified, whether the provisions are sufficiently clear and workable in practice, and whether the controls operate proportionately in response to the planning risks identified. It also considers statutory representations, additional engagement and survey material, not as determinative of the planning outcome, but as relevant evidence of how the SAPs are understood, interpreted and likely to operate in practice.

Key findings

The assessment supports the continued use of SAPs as a planning mechanism where local controls are supported by evidence and proportionate to the planning risk being managed. However, the findings are not uniform across all SAP areas.

Bruny Island SAP

The Bruny Island SAP is supported in principle, subject to refinement. The review identifies a clear and continuing need for local controls due to the interaction of environmental sensitivity, dispersed settlement, infrastructure limitations, wastewater constraints, landscape exposure and cumulative development pressure. These matters are not adequately managed through the SPPs alone.

The SAP should not proceed in its current form. Refinement is required to improve spatial targeting, mapping transparency, drafting clarity, assessment triggers and proportionality. In particular, the controls should be more clearly linked to the specific risks they are intended to manage, recognising that the SAP applies across different settlements, zones and landscape contexts.

Bonnet Hill SAP

The Bonnet Hill component of KINS7.0 is also supported in principle, subject to refinement. The area has identifiable landscape and environmental characteristics, including visual prominence, vegetation values, established low-density settlement patterns and potential pressure for further development intensity.

The review finds that a SAP remains capable of justification for Bonnet Hill because standard zone and code provisions do not provide the same level of localised response to landscape sensitivity, vegetation retention and built form outcomes. Refinement is required to improve mapping transparency, clarify assessment triggers and ensure that controls are closely aligned with the values and risks identified.

Blackmans Bay Bluff SAP

The Blackmans Bay Bluff component of KINS7.0 is not supported in its current extent and form. While parts of the area may warrant further planning consideration, particularly in relation to landscape sensitivity, vegetation retention, built form and development intensity, the evidence presently available does not demonstrate that the SAP as currently drafted and mapped is necessary, proportionate or sufficiently linked to the planning risks relied upon in support of the controls.

If additional controls are to continue for Blackmans Bay Bluff, they should be narrowed to matters and locations that are clearly justified by evidence, or supported by further technical and strategic work. Alternatively, Council should reconsider whether Blackmans Bay Bluff should remain within KINS7.0.



Consultation and representations

The review has considered statutory representations, additional engagement and survey material. These inputs have been used to identify recurring themes, test how the SAPs are understood, and assess whether the issues raised point to planning, drafting or implementation matters requiring refinement.

Community feedback, representations and survey findings informed the assessment undertaken in this report. The below report provides a summary of the key issues raised during consultation and the corresponding assessment response, while Appendix B contains the supporting survey data and respondent feedback. Collectively, these appendices provide the consultation evidence base for the review and demonstrate how community engagement has informed the assessment, findings, recommendations and preferred planning approach contained within this report.

Key themes raised through consultation include:

- uncertainty about how SAP provisions interact with underlying zones and the SPPs
- concern about the breadth and proportionality of controls
- concern regarding mapping accuracy, methodology and evidentiary basis
- uncertainty regarding definitions and assessment triggers
- concern about vegetation management, landscape character and built form outcomes; and
- concern about wastewater, infrastructure capacity and cumulative impacts.

The report distinguishes between matters that properly inform the assessment of SAP provisions and matters more appropriately addressed through broader strategic planning, zoning review, service delivery, communication or implementation processes.

Options assessment

The review considers four options for the future role and form of the SAPs:

1. no SAP;
2. narrow retention of SAP provisions;
3. refinement and restructuring of SAP provisions; and
4. alternative zoning or broader strategic planning approaches.

Each option has been assessed against statutory risk, planning effectiveness, proportionality, implementation and administration, and community confidence.

The assessment finds that removing the SAPs would simplify the planning framework, but would re-expose known gaps in the operation of standard zone and code provisions, particularly for Bruny Island and Bonnet Hill. A narrowly retained SAP may reduce some concerns regarding proportionality but is unlikely to provide a durable response unless supported by clear spatial logic, transparent mapping and a defensible explanation of what controls remain and why.

Alternative zoning or strategic planning may assist in the longer term, particularly where broader questions of settlement pattern, infrastructure capacity or environmental thresholds require further consideration. However, this option is not a complete short-term substitute for SAP refinement, particularly for Bruny Island and Bonnet Hill, where place-based controls remain justified.



Preferred pathway

The preferred pathway differs by SAP area.

For Bruny Island, the preferred pathway is retention and targeted refinement of the SAP. The SAP should be refined to better distinguish between settlement areas, infrastructure constraints, environmental values, landscape sensitivities and locations where standard provisions may be sufficient.

For Bonnet Hill, the preferred pathway is retention and targeted refinement of the SAP. Refinement should focus on mapping transparency, assessment triggers, vegetation and landscape controls, and the relationship between built form, visual sensitivity and development intensity.

For Blackmans Bay Bluff, the preferred pathway is conditional. The SAP should only continue if it is substantially narrowed to clearly justified matters and locations, or if further evidence is provided to demonstrate that additional controls remain necessary and proportionate. In the absence of that further work, reconsideration of its inclusion within KINS7.0 is warranted.

Overall, the refined and restructured SAP pathway provides the most defensible and durable outcome for Bruny Island and Bonnet Hill. It retains local controls where they are justified, addresses deficiencies in drafting and implementation, and improves the transparency and workability of the planning framework. For Blackmans Bay Bluff, the report does not support retention of the current SAP in its present extent and form.

Certification outcome

Subject to the refinements and statutory corrections identified in this report, the Bruny Island SAP and the Bonnet Hill component of KINS7.0 are capable of supporting certification of the LPS.

The Blackmans Bay Bluff component is not supported in its current extent and form. It should either be narrowed to evidence-based controls, supported by further technical and strategic work, or reconsidered as part of the final SAP package.

This approach provides a clear and defensible pathway for the Planning Authority. It retains local controls where they are justified, improves the clarity and proportionality of SAP provisions, responds to legitimate issues raised through consultation and review, and avoids extending SAP controls where the current evidence does not support their continued application.



1. Introduction

pitt&sherry has been engaged by Kingborough Council to provide an independent planning review and assessment of the draft Bruny Island Specific Area Plan (KINS6.0) and the Blackmans Bay Bluff & Bonnet Hill Specific Area Plan (KINS7.0), which form part of the draft Local Provisions Schedule (LPS) to the Tasmanian Planning Scheme (TPS).

Both Specific Area Plans (or SAPs) have been the subject of extensive community interest, statutory representations and scrutiny through the assessment of the draft LPS. Key issues raised during exhibition and subsequent review include the justification for place-based controls, the proportionality of the provisions, the relationship between the SAPs and the State Planning Provisions (known as SPPs), the transparency of mapping methodologies, and the practical operation of the controls in the assessment of use and development. These matters have informed both the Tasmanian Planning Commission's review of the draft LPS and the Planning Authority's subsequent consideration of the SAP framework.

This report has been prepared in response to *Direction 78* of the Tasmanian Planning Commission and the associated OIN issued under section 35F of LUPAA. It provides an independent assessment of the SAPs, including advice and recommendations regarding their strategic justification, statutory defensibility, operational performance and long-term workability, having regard to amendments proposed by the Planning Authority.

Direction 78 requires the Planning Authority to clarify drafting intent, address deficiencies in mapping, definitions and assessment triggers, and demonstrate that the SAPs operate transparently, proportionately and consistently with the structure and purpose of the TPS. The Direction also requires a clear explanation of why local variations to the SPPs are necessary, and whether the SAPs remain the most appropriate planning mechanism for addressing the issues identified within each area.

In response, this report examines the strategic merit of each SAP, the planning issues the controls are intended to address, the relationship between the SAPs and the broader planning framework, and the extent to which the provisions satisfy the statutory requirements applying to local planning controls. The review also considers the issues and themes arising from representations and consultation, assesses alternative planning responses, and identifies a preferred pathway for each SAP area.

The assessment recognises that the circumstances of Bruny Island, Bonnet Hill and Blackmans Bay Bluff are not identical and do not necessarily warrant the same planning outcome. Accordingly, the report evaluates each area on its own merits and distinguishes between locations where a refined SAP remains justified and locations where further evidence, refinement or reconsideration may be required before certification can be supported.

2. Purpose, Scope, & Methodology

2.1 Purpose of Report

As part of Direction 78 dated 16 October 2025, the Tasmanian Planning Commission (TPC) requested Kingborough Council to undertake a comprehensive review of the Bruny Island SAP (KINS6.0), Blackmans Bay Bluff SAP (KINS7.0) and Bonnet Hill SAP (KINS7.0). The review was requested in response to concerns relating to the strategic justification, drafting, mapping, clarity, proportionality and practical operation of the SAP provisions, together with questions regarding their relationship with the broader Tasmanian Planning Scheme (TPS) framework.

This report does not seek to replicate Council's Section 35F Report on Representations dated 23 July 2025, nor does it repeat the background analysis and supporting material contained within Council's Supporting Report prepared in support of the draft LPS. Rather, it provides an independent planning assessment of whether the SAPs remain justified, whether the provisions are appropriately targeted to the planning issues they seek to address, and whether they are capable of operating as clear, proportionate and defensible planning instruments.



The purpose of the review is not to revisit the history of the LPS process or to re-argue individual viewpoints expressed during exhibition. Instead, the review examines whether the SAPs remain the most appropriate planning mechanism having regard to the evidence available, the issues raised through representations, the requirements of LUPAA, the structure and intent of the TPS, and the practical operation of the provisions in the assessment of use and development.

In undertaking this assessment, the report recognises that the three SAP areas are not identical in their environmental, landscape, infrastructure or settlement characteristics and therefore should not necessarily result in the same planning outcome. The review accordingly evaluates each SAP area on its own merits and considers whether retention, refinement, narrowing or alternative planning responses provide the most appropriate pathway forward.

The outcome is intended to assist the Planning Authority and the TPC by providing a transparent, evidence-based assessment of the strategic merit, statutory defensibility and long-term workability of the SAP provisions, together with recommendations regarding the form in which they should proceed, if at all, as part of the final LPS.

In responding to Direction 78, this review focuses on three core questions:

- whether the strategic justification for each SAP remains sound having regard to the SPPs and section 32 of the *Land Use Planning and Approvals Act 1993*
- whether the SAPs are drafted with sufficient clarity, transparency, and internal consistency to enable predictable decision-making; and
- whether the provisions operate proportionately in response to identified planning risks, without duplicating or undermining the broader planning framework.

The assessment therefore examines the SAPs as implementation tools, rather than as expressions of policy intent alone. It considers how the provisions function in practice, how they interact with underlying zones and codes, and whether there is sufficient justification to retain, refine, narrow or discontinue the SAPs, having regard to their strategic merit, statutory basis and practical operation. This approach ensures that the review remains focused on statutory defensibility, workability and long-term effectiveness, consistent with the matters raised by the Tasmanian Planning Commission.

The objective of this Planning Report is to review and bring together four core tasks:

- Summarising and evaluating all public and stakeholder representations received on the SAPs
- Assessing the strategic merit and statutory consistency of each SAP against the TPS, the requirements of LUPAA s34(2), and the justification tests for varying the SPP under s32(4)
- Identifying the implications for underlying zoning and assessment pathways should the SAP not proceed
- Developing clear, justified, and actionable recommendations regarding the retention, amendment, or removal of SAP provisions.

This review examines the SAPs line-by-line to determine whether they satisfy those expectations and has reviewed additional community feedback to identify specific amendments required to ensure statutory defensibility, clarity and consistent interpretation, having regard to formal representations submitted and informal community feedback that formed part of this review process.

The assessment is undertaken within the framework of the Tasmanian Planning Scheme and the requirements applying to SAPs. To assist the reader, Chapter 3 explains the purpose, operation and limitations of SAPs, and provides background to the development of KINS6.0 and KINS7.0 before the detailed assessment commences.

2.1.1 Scope of Area

The scope of this review focuses on two SAPs that cover three locations: Bruny Island (KINS6.0) and the Blackmans Bay Bluff (KINS7.0) and Bonnet Hill (KINS7.0). The subject areas are defined by the following maps, overpage:

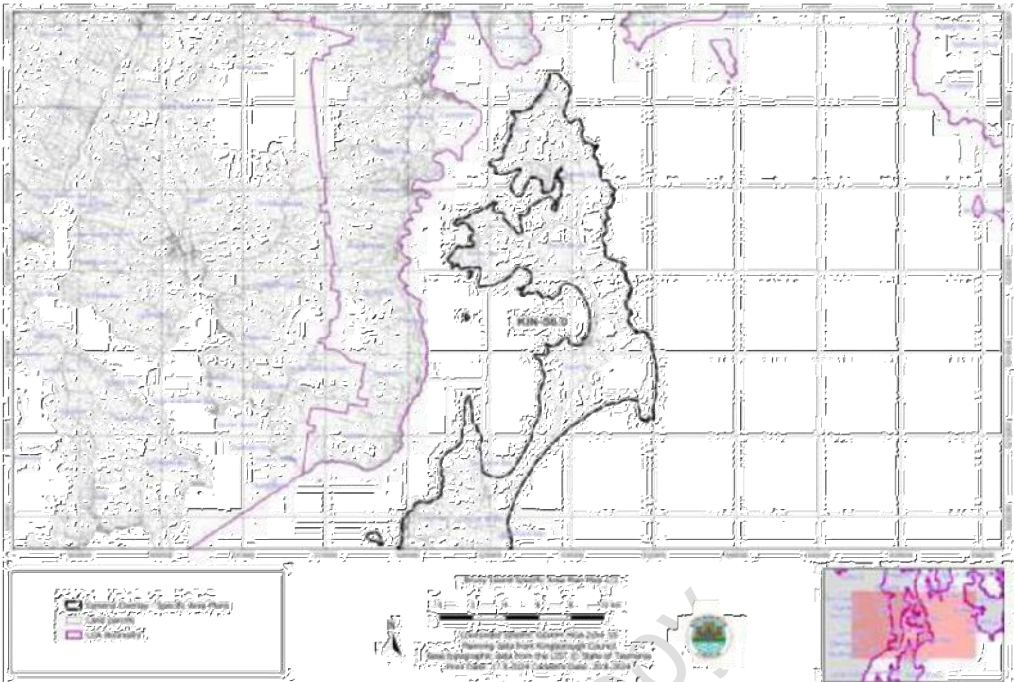


Figure 1: Bruny Island Specific Area Plan (KINS6.0) Map 1 of 2.

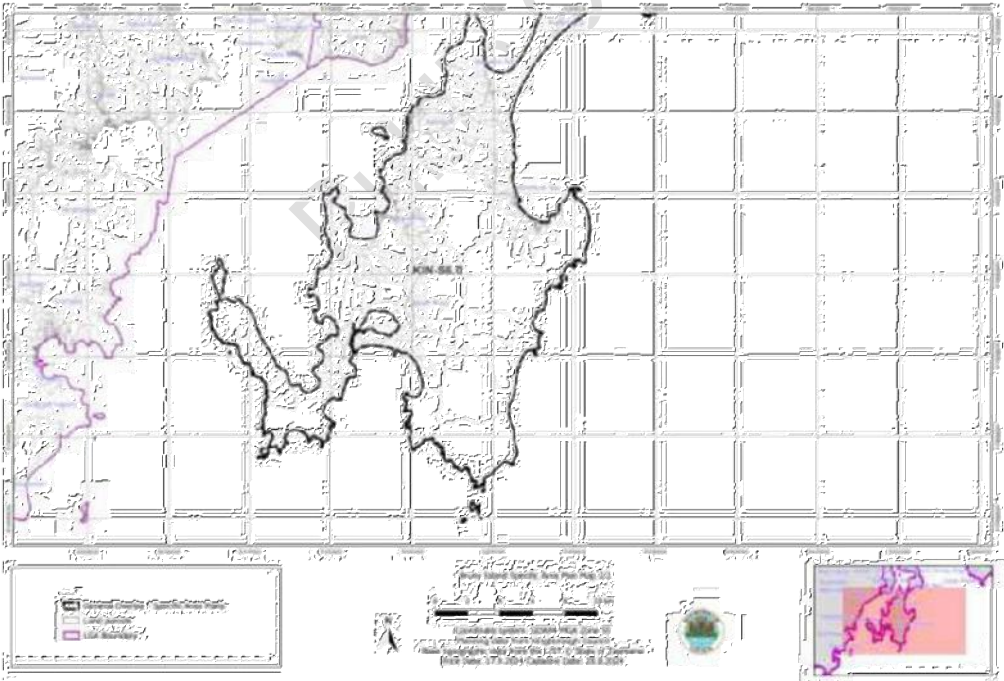


Figure 2: Bruny Island Specific Area Plan (KINS6.0) Map 2 of 2.

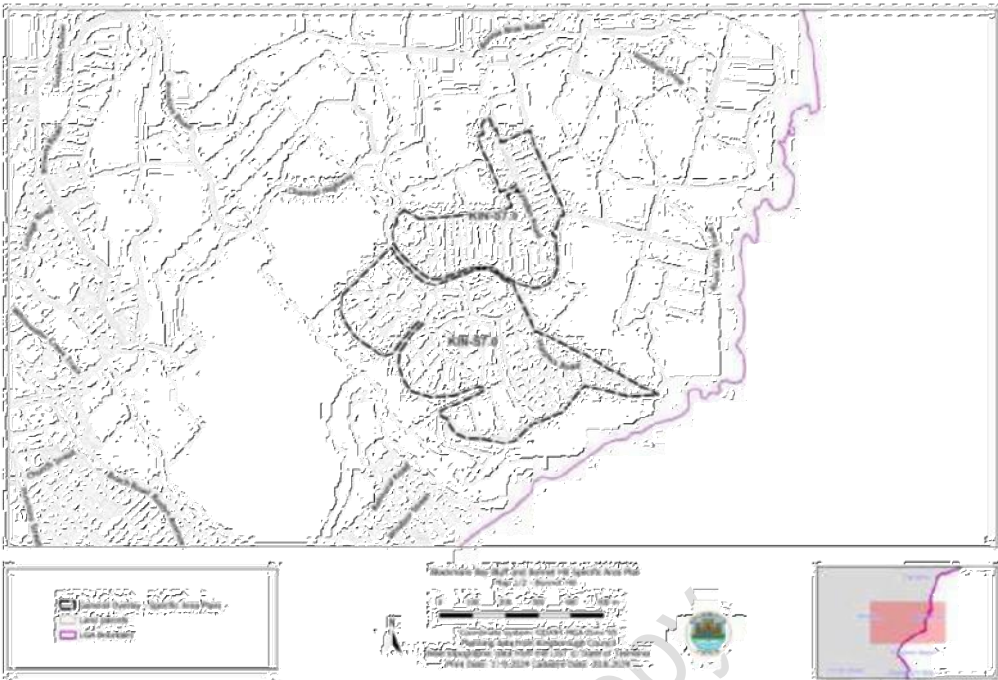


Figure 3: Blackmans Bay Bluff & Bonnet Hill Specific Area Plan (KINS7.0) Map 1 of 2.

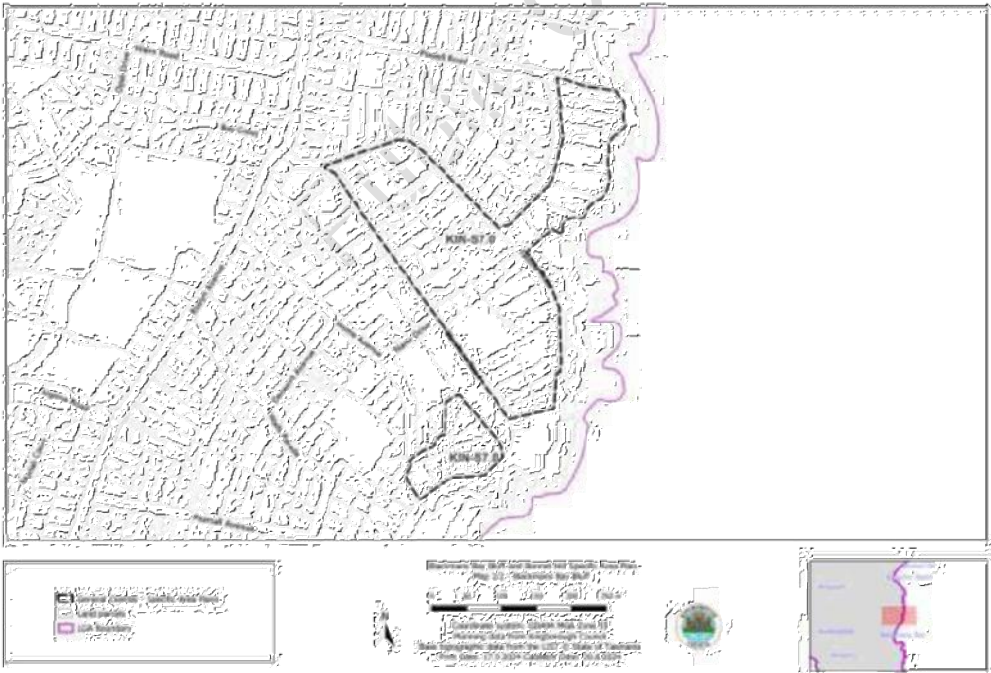


Figure 4: Blackmans Bay Bluff & Bonnet Hill Specific Area Plan (KINS7.0) Map 2 of 2.



2.2 Review Methodology

Clause LP1.5 of the SPPs sets out the requirements for structuring and drafting SAPs within a Local Provisions Schedule. Those requirements form the basis of this review, including consideration of how provisions are expressed, organised and integrated with the broader planning scheme

The scope of review extends beyond a clause-by-clause critique. It examines whether the SAPs, as drafted, operate lawfully, transparently, and proportionately as Implementation Instruments, having regard to their interaction with underlying zones, SPPs, mapping frameworks, and incorporated documents.

In undertaking this review, the following materials were examined by pitt&sherry:

- The draft Kingborough LPS (including SAP text, maps and overlays as exhibited)
- Post lodgement materials from TPC
- Relevant sections of the TPS, including the SPPs and clause LP1.5
- Public and stakeholder representations received during exhibition
- Council's section 35F report and accompanying correspondence to the Tasmanian Planning Commission
- Directions, notices, and guidance issued by the Tasmanian Planning Commission, including Direction 78
- Additional consultation and summaries
- Supporting technical material referenced by the SAPs (including mapping outputs, background reports, and policy documents where available); and
- Comparative examples of contemporary SAPs and place-based planning tools in Tasmania.

A bibliography of documents reviewed as part of this Report can be found within Appendix D. Focus was on all documents associated with developing both the Bruny Island SAP (KINS6.0) and the Blackmans Bay Bluff & Bonnet Hill SAP (KINS7.0), in addition to information that provided guidance or influence on the underlying zone within the areas.

Representations received during the formal public notice period have been reviewed in conjunction with Council's section 35F Report, subsequently grouped into themes reflecting recurring concerns across multiple submissions. Without repeating Council's 35F Report, a thematic approach allowed for the assessment to distinguish, in a transparent and defensible way, between:

- matters that warrant modification of SAP provisions
- matters arising from misunderstanding or lack of accessible explanatory material
- matters relating to zoning outcomes or broader strategic planning settings rather than the SAPs themselves; and
- matters that sit outside the SAP process but nevertheless require clarification for procedural transparency.

The subsections identify each theme, summarise the concerns raised, evaluate their planning relevance within the statutory framework, and outline recommended responses or amendments where appropriate.

Meetings were held with the key community groups within each SAP area who agreed to take part, being:

- Bruny Island Community Association (BICA)
- Friends of North Bruny (FONB)
- Bruny Island Environment Network (BIEN)
- Weetapoon / Murrayfield Station / Southeast Tasmanian Aboriginal Corporation (SETAC); and
- Bonnet Hill Residents Group.

Additionally, a questionnaire was distributed to landowners in the SAP areas to better understand their relationship to the land and their understanding of the intended purpose and operation of the SAPs. The questionnaire recognised



community members as having local knowledge and insight into the character, values, and constraints of their area, and was used to inform the review by identifying common themes and sources of concern.

The survey sought to clarify community views on what, if anything, makes the SAP areas distinctive, the nature of concerns associated with the SAP provisions, and whether respondents considered those areas to warrant a different planning approach compared to other locations subject to the Kingborough LPS. While the survey does not form part of the statutory assessment process, it provided contextual information to assist in understanding community perceptions and to inform recommendations relating to clarity, transparency, and implementation.

3. Function of SAPs explained

This section explains the statutory role and intended function of SAPs within the TPS. It provides a clear foundation for the assessment that follows by outlining what SAPs are designed to do, how they operate in relation to underlying zones and codes, and the limits of their role as place-based planning tools. The Tasmanian Planning Scheme establishes a consistent statewide planning framework through the SPPs, while allowing local variation through the LPS where this is justified by local circumstances. SAPs are one of the mechanisms available to provide place-based planning controls where standard zone and code provisions are not sufficient to address identified environmental, landscape, settlement or infrastructure issues. Their role is to operate alongside the underlying zoning framework by providing targeted controls that respond to the characteristics of a particular location.

3.1 How a SAP Works

SAPs are not a new planning mechanism. They were used under Interim planning schemes and continue to provide a means of addressing local character, environmental values and place-specific issues that may not be fully managed through statewide standards alone.

For context, other southern metropolitan councils (Hobart, Glenorchy, Brighton and Clarence) have between 10 and 21 SAPs within their current Local Provisions Schedules (LPS), while Kingborough is proposing nine SAPs (with five to be carried over from KIPS 2015).

The purpose and scope of SAPs across Tasmania are highly varied. Examples include application to airport precincts, arts and cultural precincts, entire suburbs and coastal areas with purposes such as infrastructure and density management, character and amenity controls, coastal and natural values protection.

The SAP under the TPS is a statutory mechanism that applies customised planning provisions to a defined geographic area. Standards within the SAP are dovetailed with other standards that apply to the underlying zone or code provisions; either replacing or additional, dependent on the local needs.

The TPS sets out the operation of SAPs pursuant to clause 5.3 of the Scheme, which states:

- 5.3.1 *Each Local Provisions Schedule is permitted to include a SAP that is in addition to, modifies, or is in substitution for, a provision in a zone Use Table or a use or development standard in a zone or code.*
- 5.3.2 *The requirements and structure for SAPs in the Local Provisions Schedules are set out in clause LP1.0 and Appendix A.*
- 5.3.3 *... a specific area plan is not permitted to override the administration provisions in clauses 3.0 – 6.0 or general provisions in clause 7.0.*



Therefore, under clause 5.3.1 standards within SAPs can either:

- be in addition to other standards within the zone or codes,
- modify or alter a standard within the zone or codes, or
- substitute or replace a standard within the zone or codes.

In this context, the SAP clause may apply to a matter that is applicable to several zones within an area and can be used to tweak provisions of codes to be more applicable to a particular area.

It is also important to flag that the SAP does not override the administrative provisions of the TPS as cited in clause 5.3.3 of the Scheme. As such, matters relating to the following are not superseded by SAP:

- Interpretation Cl.3.0,
- Exemptions Cl.4.0,
- Scheme Operation Cl.5.0,
- Assessment of an Application Cl.6.0, and
- Matters that fall within General Provisions Cl.7.0,

Therefore, SAPs follow the TPS convention and operation, and whilst providing governance of local matters, they do not introduce a new approach on how an application is assessed against the standards.

The use of SAPs reflects a consistent planning issue: standard zoning and code provisions do not always respond well to local conditions that are more complex, more sensitive, or more constrained than typical locations. In these situations, a more tailored approach is required.

The intent of the SAPs is therefore not to introduce unnecessary restrictions but to provide a framework that is:

- more transparent, by clearly identifying where and why controls apply
- more consistent, by reducing reliance on case-by-case judgement
- more proportionate, by focusing regulation on areas where risk or sensitivity is demonstrably higher

A Specific Area Plan is a mechanism within the Tasmanian Planning Scheme that enables place-based planning provisions to be applied where local circumstances warrant a planning response beyond, or different to, the standard provisions of the scheme. To operate effectively, a SAP should:

- have a clear and well-defined purpose;
- demonstrate logical alignment with the broader planning scheme;
- be proportionate and reasonable in relation to the planning issues it seeks to address;
- be drafted in a manner that supports the clear interpretation and consistent application of its provisions; and
- remain focused and specific in its purpose and application, avoiding unnecessary complexity or duplication.

The purpose of this review is to ensure that SAP provisions remain focused, targeted, justified and capable of being applied fairly and consistently over time.

3.2 Requirements of a SAP

The preparation of a SAP must be consistent with the requirements for a LPS under LUPAA and the structure and operation of the Tasmanian Planning Scheme (TPS). In addition to complying with the relevant provisions of sections 32 and 34 of LUPAA, a SAP must satisfy the statutory justification for varying, supplementing or modifying the SPPs. Section 32(4) provides that this may occur where the SAP delivers a significant social, economic or environmental benefit, or where the area of land exhibits particular environmental, economic, social or spatial qualities that require provisions unique to that area to apply in substitution for, in addition to, or as a modification of the SPPs.

Accordingly, the existence of SAP is not justified simply because an area is distinctive; rather, there must be a clear and demonstrable relationship between the characteristics of the land and the need for localised planning provisions that cannot be adequately addressed through the standard provisions of the TPS.

In addition, clause 5.3.2 of the TPS requires SAPs to be structured in accordance with clause LP1.5 and Appendix A of the SPPs. Clause LP1.5.1A specifies the minimum content and structure of SAP and establishes the framework within which local provisions may be prepared and applied:

- (a) *Plan Purpose; and*
 - (b) *Application, as well as at least one other sub-clause, excluding local area objectives, definition of terms or tables.*
- LP1.5.2 - The provisions of a specific area plan must include each of the headings shown in Appendix A followed by either the substance of the provision, or the words "This sub-clause is not used in this specific area plan", as the case may be.*
- LP1.5.3 - Any defined terms within a specific area plan must be additional to those set out in clause 3.0 and must not change the meaning of an existing defined term.*
- LP1.5.4 - If a specific area plan is included in a LPS it must be shown on an overlay map identifying the area of the specific area plan.*
- LP1.5.5A - specific area plan may include two or more areas, such as precincts, within the area of the specific area plan. A specific area plan with two or more areas may include:*
- (a) additional subclauses to identify the application of the specific area plan to the different areas; and*
 - (b) separate local area objectives, use tables, and use and development standards to reflect the different areas within the area of the specific area plan.*

A SAP must clearly state the planning purpose for applying local provisions and demonstrate the relationship between the characteristics of the land and the need for provisions that add to, modify or substitute the standard TPS provisions.

Clause LP1.5.5A enables a SAP to include two or more areas or precincts within the broader SAP area for example, Bonnet Hill and Blackmans Bay Bluff are two different precincts within the same SAP. Therefore, the provision of SAPs is justified where there is unmistakable evidence that:

- local environmental, landscape, servicing, hazard, or character sensitivities are not sufficiently addressed by generic zone or code standards;
- cumulative impacts pose a material planning risk that cannot be managed through standard discretionary assessment alone; and
- additional local calibration is required to deliver predictable, place-responsive outcomes.



3.3 Limits of a SAP and Matters Beyond Their Scope

SAPs are not intended to resolve all land use, infrastructure or growth management issues affecting an area. Rather, they provide targeted planning provisions where local circumstances are not adequately addressed by the standard provisions of the Tasmanian Planning Scheme. Where a clear and ongoing planning need exists, SAPs can provide a mechanism for addressing specific environmental, landscape, settlement or infrastructure issues through place-based controls that are proportionate, justified and responsive to local conditions.

They are also not used as a substitute for zoning or to address matters more appropriately resolved through strategic planning or rezoning. Rather, they provide a mechanism to refine the application of planning controls within the existing zoning framework where standard provisions are not capable of responding to localised constraints.

In particular, SAPs are not intended to:

- substitute for broader strategic planning processes, such as regional strategies, structure planning, or growth management frameworks
- correct or override underlying zoning decisions where those decisions reflect broader strategic outcomes
- regulate matters that are already comprehensively addressed through SPPs, codes, or other statutory regimes; or
- resolve infrastructure provision, service funding or capacity issues that sit outside the planning scheme's regulatory function.

Where consultation identifies issues that fall outside the intended scope of a SAP, including zoning, infrastructure provision, service delivery or broader policy matters, those issues are more appropriately addressed through separate planning processes or Council programs.

Clarifying the limits of SAPs is critical to maintaining proportionality and statutory coherence. It ensures that SAP provisions remain focused, targeted, and defensible, and do not assume responsibility for issues that cannot be effectively or lawfully managed through place-based planning controls alone.

3.4 Kingborough draft LPS & SAPs Background

Kingborough Council's draft LPS was initially prepared in 2019 as part of the transition to the TPS and publicly exhibited in 2020. That version of the LPS included several SAPs, comprising:

- SAPs carried forward from the Kingborough Interim Planning Scheme 2015 (KIPS 2015); and
- new SAPs introduced to address locations identified as having distinct environmental, landscape or settlement characteristics not adequately managed by standard provisions.

Early SAPs applied to several locations, including Blackmans Bay Bluff, Dennes Point, Conningham, Lower Snug and Kettering. Following lodgement of the draft LPS, the Tasmanian Planning Commission raised concerns regarding the breadth, justification and proportionality of several SAPs and requested that Council reconsider the overall approach to place-based controls. Subsequent engagement with the Commission resulted in a more targeted SAP framework, focused on locations where the need for localised controls could be clearly demonstrated and where SAPs represented a preferable alternative to broader rezoning or overlay approaches.

3.5 Emergence of the Bruny Island SAP

The Bruny Island SAP emerged through post-lodgement refinement of the LPS in response to concerns regarding the operation of standard planning provisions across Bruny Island and the suitability of the Agricultural Zone and Low Density Residential Zone in managing the island's distinctive planning challenges. The evolution of the SAP was influenced by the Tasmanian Planning Commission's assessment of the draft LPS and subsequent discussions regarding the appropriateness of place-based controls within the Tasmanian Planning Scheme.



Earlier iterations of the LPS proposed SAP provisions focused principally on Dennes Point. During the assessment process, questions were raised regarding whether the planning issues identified within Dennes Point, including environmental sensitivity, infrastructure limitations, settlement pattern and cumulative development pressure, were unique to that locality or reflected broader characteristics present across other parts of Bruny Island. This resulted in further investigation of the Island's settlement structure, environmental values and servicing constraints.

In response, Council adopted a broader island-wide approach that sought to provide a more consistent framework for managing identified planning risks across multiple settlements and zones. The resulting SAP was intended to address matters that were not considered to be adequately managed through the SPPs alone, including cumulative wastewater impacts, vegetation management, landscape sensitivity and the interaction between development intensity and infrastructure capacity.

The progression from a Dennes Point-focused SAP to the current Bruny Island SAP reflects a shift from addressing a single locality to addressing planning issues considered to occur across multiple parts of the island. The SAP therefore evolved as a response to the combined influence of environmental, infrastructure, settlement and landscape considerations, rather than as a direct consequence of zoning alone.

The evolution of the SAP also reflects increasing recognition that the issues identified through assessment of the draft LPS were not confined to Dennes Point. Environmental sensitivity, wastewater constraints, dispersed settlement patterns and infrastructure limitations were evident across multiple Bruny Island settlements. As a consequence, the planning response evolved from a locality-specific approach to a broader framework intended to provide a consistent response to recurring planning issues across the island.

3.6 Evolution of the Blackmans Bay Bluff & Bonnet Hill SAP

The Blackmans Bay Bluff SAP has its origins in community-initiated planning work undertaken under earlier planning schemes, including neighbourhood character studies and local area objectives aimed at protecting the area's established low-density character, landscape setting and visual amenity. These studies formed part of the evidentiary basis for the place-based controls subsequently proposed through the Local Provisions Schedule.

In the 2020 draft LPS, parts of Bonnet Hill were initially proposed within the Landscape Conservation Zone. During the post-lodgement assessment process, concerns were raised regarding the interaction between the proposed zoning approach and the underlying pattern of Low Density Residential development. This resulted in further refinement of the planning response and the eventual development of a combined Blackmans Bay Bluff and Bonnet Hill SAP intended to address identified landscape, vegetation and visual sensitivity issues through a place-based framework rather than broader rezoning.

The resulting SAP sought to respond to the shared environmental and landscape characteristics of the two areas whilst recognising their existing residential role. In particular, the SAP was intended to provide a mechanism for managing landscape visibility, vegetation retention and development intensity in locations considered to be environmentally sensitive or visually prominent.

The combined SAP also reflects a gradual shift from relying primarily on zoning responses toward the use of place-specific controls. This approach was intended to retain the underlying residential zoning framework while introducing targeted provisions addressing landscape exposure, vegetation retention and development intensity in locations identified as environmentally sensitive or visually prominent.

4. Consultation - Survey and Representations

Consultation has guided this review in two distinct but complementary ways, through statutory representations received during the formal public exhibition of the draft LPS; and secondly, through additional constituent engagement undertaken to better understand community concerns and perceptions relating to the SAPs.



The purpose of this chapter is not to re-argue or adjudicate individual viewpoints, but to clearly explain:

- what consultation was undertaken
- how different forms of feedback are treated within the statutory framework; and
- how consultation inputs have been used to inform, but not determine, the planning assessment that follows.

This distinction is critical to ensuring transparency, procedural fairness and defensible decision-making.

Appendix B contains the supporting survey data and respondent feedback that informed the review. Together, these appendices provide the consultation evidence base for this report and demonstrate how consultation outcomes have informed the assessment, recommendations and preferred planning approach.

4.1 Consultation Methods and Timeframes

4.1.1 Statutory Exhibition and Representations

The draft LPS, including the Bruny Island SAP (KINS6.0) and the Blackmans Bay Bluff & Bonnet Hill SAP (KINS7.0), was publicly exhibited in accordance with the requirements of the *Land Use Planning and Approvals Act 1993*. During this period, formal representations were invited and received by the Planning Authority.

As cited within the Section 35F Report by Council (Page 8), in accordance with Section 35C of LUPAA, public exhibition of the draft LPS occurred for a period of 60 days from 9 October 2024 to 9 December 2024. Notices were placed within *The Hobart Mercury* (8 October 2024 & 22 October 2024), with copies available online and in hard copy form at Council's Civic Centre in Kingston and Service Centre in Alonnah, Bruny Island. In addition to the statutory requirements, the Section 25F Report details additional exhibition measures (Page 8 – 9) that included social media posts, a notice in the *Chronical*, direct emails to registered parties, one-on-one meetings, small group presentations and public information sessions including at Alonnah (22 October 2024) and Adventure Bay (8 November 2024).

In accordance with the Section 35F Report, a total of 620 representations were received regarding the draft LPS, which included petitions with multiple signatories.

These statutory representations constitute the primary formal consultation mechanism under the LUPAA. They are afforded specific procedural weight, must be considered by the Planning Authority, and form part of the material before the Tasmanian Planning Commission in its assessment of the draft LPS.

4.1.2 Additional Engagement and Survey Work

In addition to statutory exhibition, Council undertook further engagement activities to assist in understanding the nature and drivers of community concern regarding the SAPs. This included targeted engagement with community groups and the distribution of a questionnaire survey to residents within the SAP areas.

This additional engagement was undertaken to:

- clarify areas of misunderstanding regarding the operation of SAPs
- better understand the values and attributes that communities associate with their local areas; and
- identify recurring themes that may warrant clarification, refinement, or better explanation within the planning framework.

While informative, this material does not have statutory status and is not a substitute for formal representations.



4.2 Statutory Representations versus Other Feedback

It is important to distinguish between statutory representations and other forms of feedback, as each plays a different role in the planning process.

Statutory Representations:

- Are made during the formal exhibition period
- Must be considered under the LUPAA
- Can directly inform assessment of strategic merit, statutory compliance, and drafting adequacy; and
- Are addressed through formal response mechanisms, including section 35F reporting.

Other Feedback (including surveys and meetings):

- Is not part of the statutory assessment process
- Does not carry determinative weight
- Provides contextual insight into community values, expectations, and concerns; and
- Is used to assist interpretation of issues raised, rather than to determine outcomes.

This review has treated statutory representations as the primary evidentiary input for assessment purposes, while using other feedback to provide contextual understanding and to inform recommendations relating to clarity, transparency, and implementation.

4.3 Overview of Consultation Outcomes

Consultation across both SAP areas revealed a high level of community interest and engagement, reflecting the sensitivity of the planning issues involved. While the content and emphasis of feedback varied between locations, several recurring themes were evident.

At a high level, consultation highlighted:

- strong concern regarding perceived over-reach or lack of proportionality of SAP controls
- uncertainty or misunderstanding about how SAP provisions interact with underlying zoning and SPPs
- concern about vegetation management, landscape character, and cumulative impacts of development; and
- apprehension regarding infrastructure capacity, particularly wastewater management in constrained environments.

Importantly, consultation also revealed that many concerns were not directed at the *existence* of planning controls *per se*, but at their clarity, justification, and perceived fairness of application.

4.4 Analysis of Representations

To enable a structured, transparent, and proportionate assessment of representations, statutory submissions were grouped into thematic categories reflecting recurring issues rather than individual viewpoints. This thematic approach supports a clearer understanding of the matters raised during exhibition and allows the review to:

- identify where concerns point to genuine planning, drafting, or implementation issues
- distinguish those matters and issues arising from misunderstanding of the planning framework or the role of SAPs; and
- respond consistently to similar issues raised across multiple submissions.



A summary of the key themes identified through this process is provided in Table 1, which presents a high-level overview of representation themes, their relative level of concern, and the SAP to which they relate. The table performs an important prioritisation and navigation function by highlighting where concerns were most consistently and prominently raised across the representation set as a whole. To assist in synthesising the issues raised, themes have been categorised according to their overall level of concern (High, Medium, or Low). This categorisation reflects the prevalence, consistency, and prominence of themes across representations, rather than the merits or planning validity of individual submissions.

The classification of themes does not determine statutory weight or planning merit. Those matters are considered separately through detailed analysis in the subsequent sections of this report, commencing at Section 4.6.

The level of concern assigned to each theme is based on the following considerations:

- A theme is classified as *High level of concern* where it:
 - was raised repeatedly across many representations; and/or
 - was raised by multiple representors independently of one another; and/or
 - featured prominently in submissions from professional advisors, community organisations, or organised groups; and/or
 - was identified as a central issue underpinning broader dissatisfaction with the SAPs.

High concern themes typically relate to process, clarity, proportionality, statutory justification, or fundamental operation of the SAPs, rather than to isolated site-specific matters.

A theme is classified as *medium level of concern* where it:

- was raised consistently, but generally in conjunction with broader issues rather than as a stand-alone concern; and/or
- was raised by a more limited subset of representors or was location-specific; and/or
- reflected legitimate planning considerations but did not dominate the overall body of representations.

Medium-concern themes often relate to how controls operate in practice, rather than to whether the SAPs should exist or how they are structured.

- A theme is classified as *Low level of concern* where it:
 - was raised infrequently; and/or
 - primarily reflected individual circumstances or personal impacts; and/or
 - did not typically carry significant weight in statutory planning assessment unless linked to broader drafting or mapping issues.

Low-concern themes are acknowledged as valid matters for representors to raise but were not a dominant feature of the representation set as a whole.

Table 1: Summary of Representation Themes – Level of Concern and SAP Relevance

Representation theme	Level of concern	Relevant SAP(s)
Consultation adequacy and accessibility	High	All SAP areas
Understanding of how SAPs interact with the Planning Scheme	High	All SAP areas
Accuracy of mapping (vegetation, natural values, overlays)	High	All SAP areas
Lack of published methodology / incorporated documents	High	All SAP areas
Scope and proportionality of SAPs (including island-wide application)	High	Bruny Island SAP
Justification for SAPs under s32(4)	High	All SAP areas
Duplication or conflict with SPPs	High	All SAP areas
Zoning alignment and consistency with zone purposes	High	All SAP areas
Vegetation protection approach	High	All SAP areas
Bushfire management conflicts	High	All SAP areas
Definitions and subjective terminology	Medium	All SAP areas
Coastal height, scenic and visual impact controls	Medium	All SAP areas
Amenity, character, and built form outcomes	Medium	Blackmans Bay Bluff & Bonnet Hill SAP
Wastewater and infrastructure triggers	Medium	All SAP areas
Tourism pressure and infrastructure capacity	Medium	Bruny Island SAP
Property value and personal hardship	Low	All SAP areas

4.5 How Representations are Considered

Consultation does not override statutory requirements, strategic policy alignment or the need for defensible, evidence-based planning controls. The number or strength of representations on a particular issue does not, of itself, establish planning merit, nor does it displace the role of the Planning Authority or the Tasmanian Planning Commission in determining appropriate planning outcomes.

However, representations are not merely a record of community opinion. Where representations provide relevant evidence relating to planning merit, environmental impacts, infrastructure constraints, statutory compliance or the practical operation of the SAPs, those matters must be considered as part of the assessment of the issue to which they relate. Representations may therefore assist in identifying matters requiring further investigation, refinement, clarification or justification.

Consultation also provides a useful means of testing how the SAPs are understood, interpreted and likely to operate in practice. When considered alongside the statutory framework, area context and strategic objectives, consultation outcomes can identify where provisions require refinement to improve clarity, proportionality, transparency and long-term workability.

The consultation findings summarised in this chapter inform the strategic, statutory and drafting assessments that follow. Appendix B provides the issues raised during consultation and the way those matters were considered during the review. Detailed consideration of individual issues and representations is incorporated throughout the assessment chapters of this report.



4.5.1 Identification of potential defects or ambiguities

Consultation assists in identifying potential defects, ambiguities, or unintended consequences where representations consistently reveal uncertainty, confusion or inconsistent interpretation arising from SAP drafting, mapping, or assessment triggers. Where similar concerns are raised across multiple submissions, this may indicate issues with clarity, internal consistency, or practical workability, rather than disagreement with the planning intent itself.

Importantly, the identification of such issues does not presume that the concern is valid in planning terms. Rather, it signals the need for further scrutiny to determine whether the issue reflects a genuine defect requiring amendment, or whether it arises from misunderstanding of the planning framework or the role of SAPs within it.

4.5.2 Testing proportionality and clarity

Consultation outcomes also assist in testing whether the SAPs operate proportionately and transparently in practice. Where representations highlight a disconnect between stated planning intent and perceived regulatory effect, this provides an opportunity to examine whether provisions are drafted too broadly, lack sufficient spatial targeting, or rely on subjective or poorly defined concepts.

This testing is particularly relevant where concerns relate to the cumulative impact of controls, the triggering of discretionary assessment for low-impact development, or the interaction between SAP provisions and underlying zones or SPPs. In these cases, consultation helps to identify where refinement may be required to better align the regulatory response with demonstrated planning risk.

Importantly, where representations provide relevant evidence concerning the planning merit of the draft LPS, including evidence relating to environmental values, infrastructure constraints, landscape impacts, statutory justification, mapping accuracy, implementation outcomes or the operation of the SAP provisions, those matters must be properly considered as part of the assessment of the issue to which they relate. The weight given to individual representations will depend on the relevance, quality and evidentiary basis of the information provided, rather than the number of representations raising a particular concern.

4.5.3 Informing implementation and communication improvements

Consultation also informs opportunities to improve implementation, explanation, and transparency without necessitating substantive policy change. In some instances, issues raised through representations relate less to the substance of SAP controls and more to the accessibility of information, clarity of definitions, visibility of mapping methodology or availability of supporting documentation.

Where this is the case, concerns may be addressed through clearer drafting, improved mapping governance, incorporation of technical material, or supplementary explanatory guidance, rather than through alteration of planning controls themselves.

4.6 Key Representation Themes Relevant to Area Context

To support a structured and transparent assessment of representations, all statutory submissions received during exhibition were reviewed and grouped into thematic categories reflecting recurring issues, rather than individual viewpoints. This thematic approach enables patterns, areas of convergence and key points of tension to be identified across submissions and provides a clear framework for assessing the planning relevance of issues raised.

Table 2 summarises the principal themes emerging from representations, identifies their relevance to each SAP, and indicates the primary planning matters to which they relate (such as mapping, drafting clarity, statutory justification, or implementation). The table is intended as a navigational and explanatory tool. It does not assess the merits of individual submissions, allocate weight, or predetermine outcomes.



Detailed evaluation of each theme, including consideration of statutory relevance, evidentiary weight and appropriate planning responses, is provided here and in the subsequent SAP-specific analysis. The table therefore serves as a consolidated reference point linking consultation outcomes to the assessment and recommendations that follow.

Table 2: Representation Themes Matrix – Summary of Issues Raised by Representors

Theme (Grouped)	SAP relevance	Primary locus (what it affects)	Summary of issues raised (neutral)	Planning lens / why it matters	Where addressed in report
Consultation adequacy & accessibility	Both (strongest Bruny)	Process / transparency	Submitters report difficulty locating or understanding SAP material, mapping, and triggers; perception that information was not accessible or “plain English”; some claim limited opportunity for meaningful engagement.	Procedural fairness and public accessibility (clarity expectations under the scheme framework). Impacts social licence and perceived legitimacy even where exhibition requirements were met.	Chapter 3, Chapter 4 and Appendix A
Understanding of scheme / SAP interaction	Both	Communication / interpretation	Confusion about how SAP provisions interact with underlying zones and SPPs (what changes, what remains, and when SAP “overrides”).	Misunderstanding can inflate conflict and create ongoing administration risk. Indicates need for clearer drafting, definitions, and explanatory material.	Chapter 3, Chapter 4 and Appendix A
Mapping accuracy (vegetation / natural values / overlays)	Both	Mapping / methodology	Claims that mapped vegetation or natural values areas do not reflect on-ground conditions; inconsistencies across lots; uncertainty about data sources and criteria; calls for audit and correction.	If mapping is inaccurate or methodology is not transparent, SAP triggers are vulnerable and difficult to administer consistently.	Chapter 5, Chapter 7.1, Chapter 8 and Appendix A
Absence of published mapping methodology / incorporated documents	Both	Governance / evidentiary basis	Submitters question reliance on technical layers or criteria that are not publicly available, not clearly incorporated, or not version-controlled.	Undermines transparency and defensibility; creates non-auditable controls.	Chapter 7.1, Chapter 8 and Appendix A
Overly broad scope / spatial targeting (esp. Bruny Island-wide)	Primarily Bruny	Spatial logic / proportionality	Objection to island-wide application; argument that Bruny contains diverse localities and risks; calls for precinct-based	Proportionality and tailoring; blanket application can weaken justification and increase perceived overreach.	Chapter 5.1, Chapter 6, Chapter 7.1 and Chapter 8



Theme (Grouped)	SAP relevance	Primary locus (what it affects)	Summary of issues raised (neutral)	Planning lens / why it matters	Where addressed in report
			application or narrower controls.		
s32(4) justification / "why SAP at all"	Both	Statutory threshold / justification	Professional and community submissions question whether SAP variations are justified (unique characteristics or significant benefit), and whether SAPs duplicate standard provisions.	Central legal and strategic test for varying SPPs; a key driver of Commission scrutiny.	Chapter 6 and Chapter 7.1
Duplication / conflict with SPP codes (policy creep)	Both	Drafting / scheme integration	Claims SAP provisions repeat or conflict with SPPs or codes (e.g. natural values, hazards), increasing complexity and discretion.	Duplication and/or internal inconsistency can undermine effectiveness and fairness.	Chapter 7.1 and Appendix A
Definitions and subjective terminology	Both	Drafting quality	Concerns about unclear or subjective terms (environmental descriptors, triggers, thresholds) and inconsistent terminology between SAP text and maps.	Clarity and workability: vague terms increase inconsistency and appeal risk.	Definitions & Acronyms, Chapter 7.1 and Appendix A
Wastewater controls / intensification triggers	Both (strong Bruny)	Infrastructure / assessment triggers	Concern that triggers make minor changes discretionary; uncertainty about what constitutes "intensification;" concerns about feasibility and fairness in unsewered areas.	Requires risk-based targeting and enforceable thresholds to avoid over-regulation of low-impact proposals.	Chapter 5.1, Chapter 7.1 and Appendix B
Coastal height / visual exposure logic	Bruny + coastal precincts	Built form / scenic	Concerns about coastal proximity definitions, height limits, visual impact triggers, and consistency with existing character; requests for clearer spatial logic.	Must be evidence-led and mapped or defined to be defensible and avoid arbitrary outcomes.	Chapter 5, Chapter 6, Chapter 7.1 and Appendix B
Vegetation protection approach (incl.	Blackmans Bay /	Natural values / mapping & standards	Questions about vegetation retention requirements, how "vegetation" is defined,	Controls must align with mapping methodology and be	Chapter 5, Chapter 6, Chapter 7.1 and Appendix B



Theme (Grouped)	SAP relevance	Primary locus (what it affects)	Summary of issues raised (neutral)	Planning lens / why it matters	Where addressed in report
garden vs vegetation)	Bonnet Hill + Bruny		and whether distinctions are credible; concerns about lot-scale impacts.	capable of consistent interpretation.	
Bushfire management conflict	Blackmans Bay / Bonnet Hill + Bruny	Code conflict / safety	Concerns that vegetation retention or SAP standards may conflict with bushfire hazard management requirements or practical safety needs.	Conflicts between provisions create statutory and practical risk; requires clear hierarchy and implementation guidance.	Chapter 7.1 and Appendix B
Amenity / character / built form outcomes	Blackmans Bay / Bonnet Hill (strong)	Character / visual	Desire to retain "dwellings in vegetation" character; concerns about bulk, height, and visibility from public viewpoints.	Supports place-based rationale but requires precise and measurable standards.	Chapter 5.2, Chapter 5.3, Chapter 6 and Appendix B
Tourism pressure / carrying capacity (Bruny)	Bruny	Strategic assumptions	Submissions identify a perceived mismatch between strategic framing and observed tourism pressure; concerns about infrastructure and environmental capacity.	Strategic alignment: assumptions must be accurate and consistently reflected in SAP objectives and controls.	Chapter 5.1, Chapter 6 and Chapter 7.1
Zoning alignment / zone purpose concerns (interaction with SAP)	Both	Zoning interface	Submissions argue SAPs are compensating for zoning choices or creating outcomes inconsistent with zone purposes; some seek rezoning rather than SAP controls.	Important to distinguish what SAPs can address versus matters requiring zoning or strategic change; informs options analysis.	Chapter 3.3, Chapter 6, Chapter 7.1 and Chapter 8.4

5. Area Profiles: local context, values & planning constraints

This section provides concise, evidence-based profiles of each area subject to a SAP. Its purpose is to establish a clear and shared understanding of the local context, values, and planning constraints relevant to each SAP, prior to any assessment of strategic merit, statutory compliance, or responses to representations.

The profiles draw on existing background material, including Council-commissioned studies, supporting documentation prepared for the LPS, and relevant strategic and technical sources. The information is presented to identify the distinguishing characteristics, sensitivities, and constraints of each area, and to explain the planning circumstances in which standard zone and code provisions may be insufficient to manage development predictably and proportionately.

Each SAP area profile is presented in a consistent and structured format. This approach ensures that the characteristics, constraints, and planning considerations of each area are described comparably and transparently, and that the assessment which follows is grounded in a clear contextual baseline.

The profiles address the following matters:

- **Local context and distinguishing characteristics**
Including settlement pattern, land use context, and physical setting.
- **Environmental, landscape and infrastructure considerations**
Including environmental values, landscape sensitivity, servicing constraints, and wastewater considerations, where relevant.
- **Current planning framework**
A high-level description of how the area is presently managed under the TPS, including underlying zoning and applicable codes.
- **Planning risks and limitations of standard provisions**
Identification of the key risks that may arise if use and development are managed solely through standard zone and code provisions, without locally tailored controls.

The material informing the profiles is evidence-led and draws on, where relevant:

- population and settlement information
- infrastructure and wastewater constraints
- tourism and visitation pressures
- environmental and landscape values; and
- documented community expectations at a high level.

Detailed analysis of representations, survey results and consultation themes is intentionally excluded from this section and is addressed separately, to maintain a clear distinction between contextual description and evaluative assessment.

5.1 Bruny Island SAP

Bruny Island exhibits a combination of environmental, landscape, infrastructure and settlement characteristics that distinguish it from most other locations within the municipal area. These characteristics form the basis of the proposed SAP and provide the context for the assessment that follows. The detailed consideration of whether these characteristics justify a SAP under section 32(4) of LUPAA is addressed in Chapter 6.

5.1.1 Landscape & Environmental Values

Bruny Island covers approximately 362 square kilometres, and its island setting is central to the planning issues addressed by the SAP. Bruny island encompasses two distinct terrains. North Bruny Island is dryer, has lower landforms and a more open forest type with the understory often grazed by livestock sheep, whilst South Bruny Island consists of a wetter, higher landform¹. The difference in soil dryness is evident within Map – Bruny Island: Soil Dryness Index, showing a stark contrast between the north and the south of the Island, further emphasising concerns of water availability on the Island.

Bruny Island contains regionally and nationally significant environmental values, including extensive coastline, diverse ecosystems and habitat supporting many bird species² that include extensive areas of high-value native vegetation, dry coastal forests, wet eucalypt communities, heathlands, and mature habitat trees³. The Island provides critical habitat for nationally significant fauna such as the Swift Parrot and Forty-spotted Pardalote⁴, as well as over 140 bird species, with approximately 40 threatened species recorded as present. Habitat loss due to land clearing from agriculture and urban areas is regarded as the main threat to the Swift Parrot⁵ and the Forty-spotted Pardalote⁶. The significance of the Swift Parrot and Forty-spotted Pardalote extends beyond their status as threatened species under Commonwealth and State legislation. Both species are the subject of dedicated National Recovery Plans, which identify habitat protection, management and recovery actions intended to support their long-term conservation. These recovery frameworks provide an important strategic context for considering vegetation retention, habitat values and development impacts within areas known to support these species.



Figure 5: North Bruny flatter terrain with the dominant land use in the landscape being livestock grazing.

¹ Appendix C: Map 1c – Bruny Island: Soil Dryness Index.

² Cochran, T. (2003). Managing threatened species and communities on Bruny Island. *Threatened Species Unit, Department of Primary Industries, Water and Environment, Tasmania*.

³ Appendix C: Map 1a – Bruny Island: Vegetation Community Composition.

⁴ Appendix C: Map 4– Bruny Island: Kingborough Threatened Species Observations 2016 to Present.

⁵ DCCEEW 2024, National Recovery Plan for the Swift Parrot (*Lathamus discolor*), Department of Climate Change, Energy, the Environment and Water, Canberra. P-17.

⁶ DCCEEW 2024, National Recovery Plan for the Forty-spotted Pardalote (*Pardalotus quadragintus*), Department of Climate Change, Energy, the Environment and Water, Canberra. P-15.



It is observed that examples of land clearing for agriculture provided within "National Recovery Plan for the Swift Parrot" are not of Bruny Island but sites on mainland Tasmania or mainland States. Although precautionary planning is an underlying objective of the Resource Management and Planning System of Tasmania (RMPS), there does appear to be concern throughout the community feedback that the provisions within the SAP for vegetation management are heavy handed and overbearing.

The Island is recognised regionally as having important understorey ecosystems that are not protected under the Natural Assets Code in Low Density Residential Zoned areas. These values require site-responsive, evidence-based planning controls to avoid incremental loss through small-scale development and vegetation modification.

Environmental and physical constraints intensify the planning risk. Much of the island is characterised by steep topography, shallow and dispersive soils, elevated groundwater levels, and limited capacity for safe on-site wastewater disposal. In unsewered settlements – something that applies across almost the entire island – hydraulic load increases can place cumulative pressure on receiving environments, especially where existing systems are ageing or performing poorly. Standard SPP tools do not manage wastewater intensification outside of subdivision, leaving a regulatory gap the SAP was intended to fill.

Bruny's visual character also requires specific attention. The island's settlements are typically low-profile clusters nestled within vegetated coastal slopes and backdrops. Public viewsheds – from beaches, lookouts, foreshore reserves, and coastal approach routes – are extremely sensitive to build form intrusion.

In contrast to the steep forested topography of South Bruny, the low-level terrain of North Bruny facilitates most of the area regarded as "Potentially Unconstrained – Land Potentially Suitable for Agriculture"⁷. The potentially unconstrained agricultural land is across most of the North Island and is dominated by Weetapoon / Murrayfield Station, with the core agricultural use being livestock grazing; although, the farm does not cover the entire area of North Bruny. The mapped "Potentially Unconstrained Land" on South Bruny is contained to predominantly valley floors and historically cleared land. The Agriculture Zone proposed for the Kingborough LPS predominately follows the pattern Potentially Unconstrained Land.

A core justification for the SAP is the fact that whilst there may be significant native vegetation communities and habitat within the land marked for the Agriculture Zone, pursuant to cl. C7.2.1(c) of the Natural Assets Code the Priority Vegetation Area does not apply to land zoned Agriculture. The absence from planning does not mean that the native vegetation is not covered by other legislation, for example, *Forest Practices Act 1985*, *Threatened Species Protection Act 1995*, or the *Environment Protection & Biodiversity Conservation Act 1999* (EPBC). However, need for vegetation management within the SAP is presented on the grounds that not all vegetation management would be associated with the considerations of these Acts.

The environment and landscape values:

- extend across both public and private land
- are sensitive to incremental development; and
- require integrated management beyond standard zoning provisions.

At a regional scale, STRLUS identifies protection of environmental values and limiting inappropriate development as key strategic priorities⁸.

⁷ Appendix C: Map 5 – Land Potentially Suitable for Agriculture.

⁸ Department of State Growth 2025b, STRLUS Response to Consultation Feedback, *Tasmanian Government*



5.1.2 Settlement Pattern

Bruny Island contains significant Aboriginal and European cultural heritage values that continue to contribute to the island's identity, landscape and sense of place. Of particular significance is Murrayfield Station, a 4,100-hectare property owned and managed by the *weetaipoona* Aboriginal Corporation. Murrayfield supports a range of activities including sustainable agriculture, cultural practice, education and environmental stewardship, demonstrating the ongoing relationship between cultural values, community, land management and the protection of natural values on Bruny Island.

The settlement patterns have been reflective of the Islands heritage from onshore whaling stations, timber haulage sites, to historic locations for ferry access. However, as pointed out within community feedback by several submissions implied that Bruny has always been a holiday destination, with the result, settlement patterns reflected shack settlements focused on the island waterfront.

The Island has a permanent population of approximately 800 people, with only around one-third of dwellings occupied on a permanent basis⁹. This results in a population that fluctuates significantly throughout the year, evident with the 2021 census data indicating around a thousand residents on census night; although, it is noted that this picks up visitors residing overnight on the Island. Demographically, the Island has a markedly older profile, with approximately 74% of residents aged over 45 years and around 37% aged over 65 with a median age of approximately 58.8 years¹⁰. This, with a dispersed pattern of villages and rural living areas, combined with limited infrastructure, amplifies the consequences of incremental intensification.

As illustrated in Appendix C Map1d – Bruny Island Population Density & Distribution, development is:

- low density and dispersed,
- frequently arranged as ribbon development along roads,
- interspersed with undeveloped and constrained land.

Bruny Island is outside the Greater Hobart Urban Growth Boundary (UGB) on Map 10 of the *Southern Tasmania Regional Land Use Strategy 2010 - 2035* (STRLUS). The Low Density Residential as noted in the KC Supporting Report "the minimum lot size discrepancy, the Low Density Residential Zone most accurately describes the existing use and development in Dennes Point, Alonnah, Adventure Bay and Lunawanna." Under the KIPS2015, the minimum lot size for (Area A of) the Low Density Residential Zone is 2,500m² and does not allow Multiple Dwellings.

A justification for the Bruny Island SAP has been based on the basis that the residential settlements of the Island are located outside of the UGB and without provisions on the minimum lot size there would be an increase development that is inconsistent with the infrastructure capabilities and the STRLUS. Under the SPPs the minimum lot size requirement will for the Low Density Residential Zone will reduce to a minimum lot size requirement of 1,500m² under the Acceptable Solutions and 1,200m² under the Performance Criteria per dwelling: spatially seen within the maps below.

Additionally, Multiple Dwellings will be possible under the SPPs, although a discretionary use class. As cited within the KC Supporting Report, given the "spatial qualities of the Low Density Residential Settlements, the SPPs would create the opportunity for approximately another 155 lots or Multiple Dwellings over and above the current provisions of KIPS2015" (p.182). The minimum lot size of 2,500m² as proposed by the SAP enables sufficient land within a lot's boundary to effectively manage the local drainage and absorption requirements.

⁹ Kingborough Council 2016a, Bruny Island Destination Action Plan 2016–2018, *Destination Southern Tasmania*. p.182.

¹⁰ Kingborough Council 2017, Bruny Island Tourism Strategy, *Kingborough Council*. p.10.



Figure 6: Lot size spatial qualities for Low Density Residential Zone at Dennes Point, Great Bay, and Kilara. (Source: Kingborough Council)



Figure 7: Lot size spatial qualities for Low Density Residential Zone at Alonnah and Lunawanna. (Source: Kingborough Council)



Figure 8: Lot size spatial qualities for Low Density Residential Zone at Adventure Bay. (Source: Kingborough Council)

The combination of a small, permanent population, an ageing demographic, a highly dispersed settlement for the small population over the expanse of the Island, limits the ability to support and improve services, accommodate growth efficiently, and respond to increasing development pressures.

5.1.3 Tourism & Development Pressure

Tourism is a primary economic driver on Bruny Island and a key factor shaping land use and development. The *Bruny Island Tourism Strategy 2017* notes that:

In 2002, Bruny attracted 29,400 interstate/international visitors or 5 percent of all visitors to Tasmania. In 2016/17, 147,807 interstate and overseas visitors came to Bruny Island, a 13.9% increase on the previous year, and representing 11.6% of all visitors to Tasmania – a larger proportion than previous years. In that time, the total number of visitors (aged 14 or over) that stayed overnight grew from 11,246 in 2002 to 45,634 in 2016/17. (p.35)

Kingborough Council's *Bruny Island Destination Action Plan 2016–2018*, cited that the Island receives over 190,000 visitors annually, including approximately:

- 111,000 interstate and international visitors; and
- over 80,000 intrastate visitors.

The Bruny Island Destination Action Plan identified tourism as a significant component of the local economy and noted strong growth in visitor activity across the island (Kingborough Council, 2017). This information formed part of the evidence base relied upon by Council when the original SAP documentation was prepared and submitted to the Tasmanian Planning Commission. While those figures were current at the time of the original submission, more recent visitor and tourism trends have been considered separately through current Tourism Tasmania data, as presented in Figure 9.

Bruny Island continues to experience sustained and high levels of visitation relative to its permanent resident population. Visitation is concentrated along key access routes, ferry services, coastal destinations, and settlement nodes, resulting in disproportionate pressure on infrastructure, services, and the natural environment. While visitation levels fluctuate seasonally, the overall trend identified through Council strategies and supporting material is one of ongoing growth and intensification of tourism activity.

Importantly, the scale of visitation is not reflected by population metrics alone. The temporary and episodic nature of visitor demand places cumulative pressure on wastewater systems, road networks, emergency services, and sensitive environments in a manner that standard planning controls are not well equipped to manage. This disconnect between permanent population, and actual demand is a key planning consideration underpinning the need for locally tailored controls. Critically, visitor numbers significantly exceed the permanent resident population, resulting in a scale of demand on infrastructure and services not reflected by population metrics alone.

Visitor activity is concentrated along key routes and destinations, resulting in:

- pressure on access roads and ferry services
- increased demand for visitor accommodation; and
- cumulative impacts on environmental values and amenity.

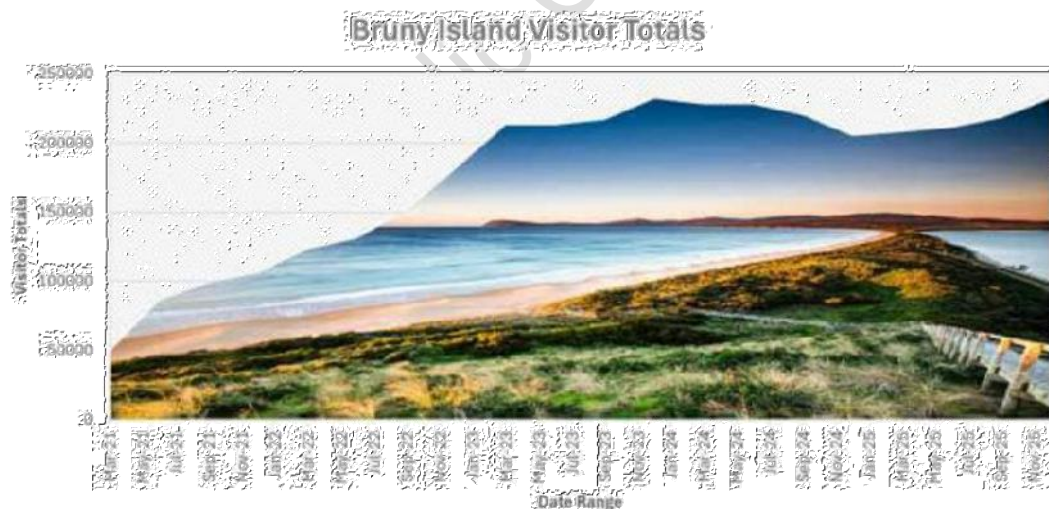


Figure 9: Bruny Island Visitor's at a glance. (Source: Tourism Tasmania)

5.1.4 Infrastructure Capacity

Bruny Island's ability to accommodate development is fundamentally constrained by limited infrastructure and servicing. This includes the absence of reticulated water supply and sewer services, reliance on localised or limited energy systems (including diesel generation), and dependence on a single ferry connection for access.

Table 3 summarises the key infrastructure constraints relevant to Bruny Island and highlights how those constraints translate into planning risks and limitations on development capacity. What this means: Infrastructure operates as a physical limit on development, rather than a constraint that can be easily addressed through individual development proposals



Figure 10: Access to Bruny Island is restricted to the movement of the ferry. (Source: Tourism Tasmania)

Roads, wastewater absorption capacity, and emergency management rely on low-density development remaining the prevailing pattern. Without tailored controls, the combined effect of small-scale dwellings, extensions and tourism conversions risks outpacing the Island's infrastructure and environmental capacity. A SAP is therefore an appropriate mechanism to ensure that growth occurs at a scale compatible with the Island's constraints.

The ferry system operates as a practical constraint on movement, servicing, and emergency response, effectively limiting the scale and pace of development that can be sustainably accommodated on the Island. This constraint amplifies the consequences of incremental intensification and reinforces the need for planning controls that align development outcomes with physical and operational capacity.

Regional planning policy reinforces that development should align with available infrastructure and service capacity¹¹.

¹¹ Department of State Growth, 2025a

Table 3: Key infrastructure constraints and planning implications

Element	Constraint (local condition)	Planning implication (
Water supply	No reticulated system; reliance on rainwater and on-site storage	Reinforces low-density expectations and limits the scale of additional development; proposals may increase demand beyond reliable on-site supply.
Wastewater / sewer	No reticulated sewerage for most settlements; reliance on on-site disposal	Cumulative hydraulic loading can be a planning risk; intensification may warrant clearer triggers and thresholds beyond subdivision-only controls.
Roads and access	Limited road network and constrained capacity at peak periods; limited redundancy	Incremental growth can generate cumulative safety and access impacts; requires a planning response that better aligns development with network capacity.
Energy supply	Localised/limited supply (including reliance on local generation in parts)	Constrains intensity and expansion; increases need for staging assumptions and design responses that are not always captured by standard provisions.
Emergency management	Island context and reliance on constrained access routes	Development outcomes need to remain compatible with emergency response capacity; cumulative intensification can increase risk exposure.
Transport connection	Single ferry connection for access to/from the island	Acts as a practical "capacity ceiling;" magnifies the consequences of incremental change and seasonal population peaks.

5.1.5 Community Values and Expectations

Community submissions consistently emphasised a desire to protect Bruny Island's character, maintain its environmental integrity, and ensure that development is proportionate to its infrastructure capacity.

Residents accept and support the need for regulation where it is evidence-based, clearly explained, and transparently targeted at genuine risks. Consistent with the purpose of a SAP, planning controls should remain targeted, proportionate and responsive to clearly identified local circumstances. Strengthening clarity, improving mapping transparency, and ensuring proportionality will help maintain public trust and reinforce confidence in the long-term operation of the SAP

When asked, "what do you value the most about the area where you live or where your property is?" *Privacy and low-density living* were the most popular choice of 35%, followed by *Natural environment and vegetation* equal with *Local character and community feel*, followed by *scenic views and visual amenity*.

Sentiment was expressed that they "value privacy and local characteristics as well as the natural values," but also "value that it has always been a place for holidays, with people owning modest shacks."

Increased visitor numbers have the potential to place additional pressure on local infrastructure, transport networks, environmental values and community character. Community feedback identified concerns regarding traffic volumes, ferry capacity, infrastructure constraints, tourism intensity and the cumulative impacts of visitation on the qualities that make Bruny Island attractive to both residents and visitors. Bruny Island's environmental values, scenic landscapes and biodiversity are central to its appeal as a destination. Maintaining the long-term sustainability of tourism therefore requires careful management of development and land use change to ensure these values are protected and that visitor growth remains compatible with the island's environmental, infrastructure and community capacity.

5.2 Bonnet Hill SAP

As Bonnet Hill is outside the UGB on Map 10 of the *Southern Tasmania Regional Land Use Strategy 2010 - 2035* (STRLUS), and due to the environmental values attributed to the area, Bonnet Hill was initially proposed as a Landscape Conservation Zone in the 2020 draft LPS. The TPC subsequently raised concerns regarding the interaction between the proposed controls and underlying Low Density Residential zoning, including transitional issues affecting properties that were zoned Environmental Living under the KIPS 2015 but rezoned Low Density Residential under the LPS. The implications of these characteristics for SAP justification and the assessment against section 32(4) of LUPAA are considered in Chapter 6.

In response, Council developed a combined Blackmans Bay Bluff and Bonnet Hill SAP, recognising the shared landscape sensitivity, visual prominence, and settlement characteristics of these areas in the 2024 draft LPS. The combined SAP was intended to address these issues in a targeted manner, whilst avoiding the need for broader rezoning approaches that raised concern during earlier stages of the LPS process.

Subsequently, the purpose of the Bonnet Hill SAP is summarised to:

- maintain visual amenity that Bonnet Hill Precinct provides to Kingston and Kingston Beach
- maintain the local character and amenity of the two precincts that is defined by dwellings nestled within a mix of vegetation including native and non-native species, and
- where on-site wastewater management is required, lots have sufficient land available for on-site wastewater management.

As a result, the strategic basis for the Bonnet Hill SAP is grounded in the distinctive landscape, biodiversity and urban characteristics associated with the coastal headland¹². Council's Supporting Report cites that these attributes cannot be adequately managed through the SPPs alone:

Most of the Bonnet Hill residential area has been zoned as Low Density Residential in the KIPS2015. However, due to the fact that the future Natural Assets and Scenic Protection Codes won't apply to the Low Density Residential Zone, a SAP is required to support development, but in a manner that will maintain the unique scenic attributes and environmental qualities of the area. (p.74)

At present the larger lots along Browns River are separated by a large strip of public land that covers, for the most part, land between the 0m and 40m contour level. The result is a heavily timbered foreshore for Bonnet Hill area that includes over 20 hectares of threatened native vegetation communities, including 14.8 hectares of *Eucalyptus globulus* dry forest and over 6.6 hectares of *Eucalyptus ovata* forest and woodland. Additionally, within this area, Council's Supporting Report cites that known threatened species populations are present, such as double jointed speargrass, and foraging habitat for the swift parrot, the Chaostola skipper, the Tasmanian devil, the eastern barred bandicoot habitat, and the forty-spotted pardalote. These natural values characteristics are evident within the LIST mapping layer TASVEG 5.0 Vegetation Communities (TASVEG) and the Threatened Species sightings since 2016¹³.

¹² Appendix C: Map 3b: Bonnet Hill SAP – Regional Natural Values Characteristics

¹³ Appendix C: Map 3b: Bonnet Hill SAP – Regional Natural Values Characteristics



Figure 11: View of Bonnet Hill from Kingston Beach. (Source: T. Henderson)

The established vegetation communities and landform of Bonnet Hill contribute to a highly visible and valued landscape backdrop when viewed from Kingston Beach (Figure 11), the Derwent Estuary and surrounding public vantage points. These characteristics also form part of the broader visual transition between urban Kingston and the more vegetated and elevated landscapes to the south. However, as pointed out by several submissions, no visual impact assessment has been included to provide evidence that the entire area needs to be included within the SAP area to maintain the landscape amenity for the area.

Access to Bonnets Hill is limited to vehicles via Channel Highway, either south to Kingston or north to Taroona. Pedestrian access is available to the south via a footbridge. However, due to the topography and scale of the area, it is not considered a walkable option for general commuting.

A review of the TasWater Infrastructure indicates that the land below Channel Highway is serviced with water and sewer. On the upper side of the Highway, only the smaller lots along Lynden Road are serviced with reticulated water.

There is a distinctive urban form of modest-sized, single dwellings located on lots that predominantly range from 1,500 m² to 6,000 m²; although it is noted that there are several lots outside this range (Figure 4)¹⁴.

The smaller lots are concentrated within the eastern and northern parts of the Bonnet Hill SAP area. Under the State Planning Provisions, the Low Density Residential Zone generally applies a minimum lot size of 1,500 m². In theory, applying the State Planning Provisions lot size standard could increase the number of potential lots and result in a greater level of development intensity within parts of the area. In practice, however, many existing lots are already developed and, in a number of cases, further subdivision would be constrained by existing buildings, site configuration, topography and other development considerations. While much of the area is serviced, it remains outside the Urban Growth Boundary (UGB). Consequently, there is a concern that widespread application of the standard SPP lot size provisions may not be consistent with the settlement objectives of the *Southern Tasmania Regional Land Use Strategy 2010–2035*.

¹⁴ Kingborough Council Attachment 9. s32(4)(b) statement for the Blackmans Bay Bluff and Bonnet Hill SAP – Final, Figure 9



Having regard to the existing pattern of development at Bonnet Hill, most dwellings are centrally located on their lots in response to the setback requirements of the Kingborough Planning Scheme 2000. Consequently, while a 1,500 m² minimum lot size may theoretically increase subdivision potential, the practical ability to achieve additional lots is constrained by the location of existing buildings, lot configuration and other site-specific considerations.

The Bonnet Hill SAP area is outside of the UGB, and in consideration of the potential for intensification described above, there is reasonable planning basis¹⁵. Accordingly, there is a reasonable planning basis for controls that continue to regulate lot yield and residential density within the Bonnet Hill precinct.

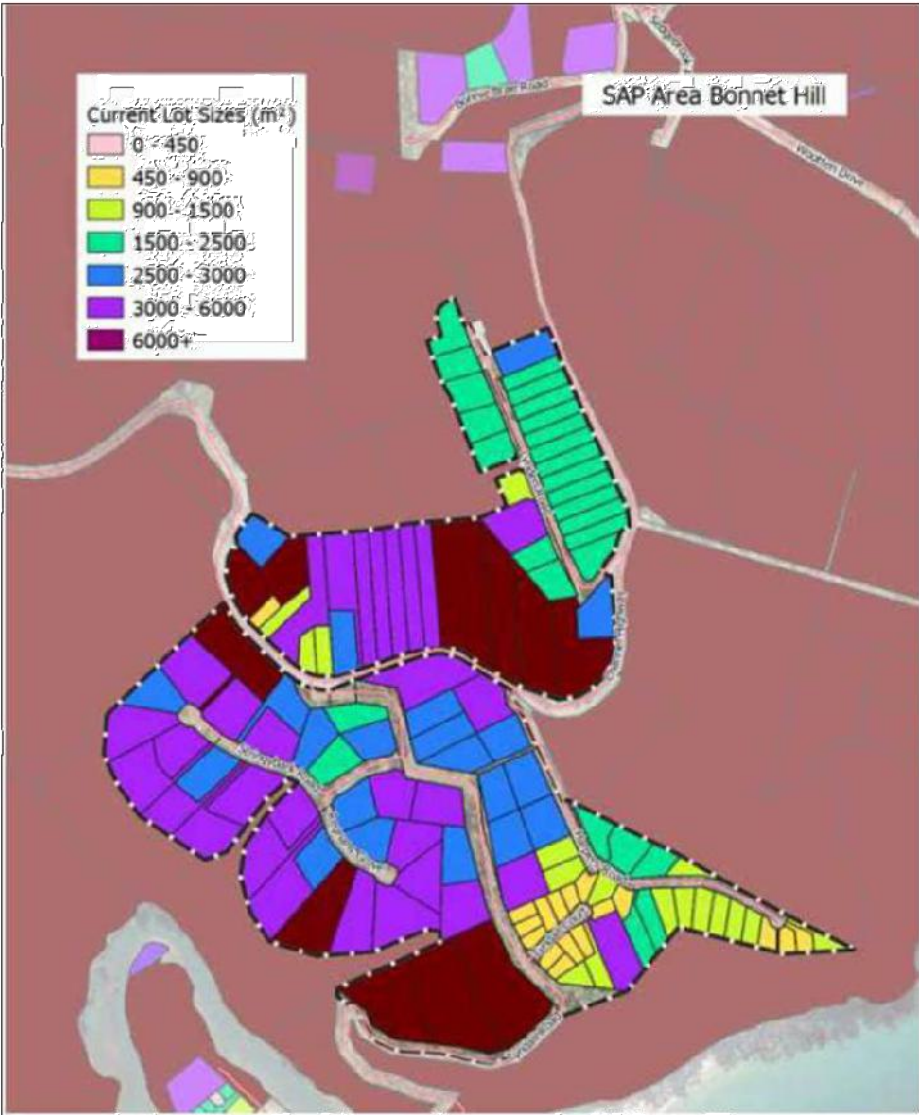


Figure 12: Bonnet Hill spatial qualities.

¹⁵Appendix C: Map 6: Greater Hobart Urban Growth Boundary

5.3 Blackmans Bay SAP

As presented within Council's Supporting Report, the strategic basis for the Blackmans Bay Bluff SAP is grounded in the distinctive landscape, biodiversity and servicing characteristics of these coastal headlands, and historic development pattern. Council cites that the SAP for this area has been developed in consultation with the local community formatting Local Character Statements as part of the Interim Planning Scheme in 2017, due to the position that the SPPs for General Residential or Low Density Residential are outdated or not comprehensive enough to protect the unique characteristics of the area. The extent to which these characteristics justify the SAP in its current form is considered further in Chapter 6 and Chapter 7.

The Supporting Report presents an image in Figure 9 (of that report – presented here as Figure 13) of a heavily timbered or vegetated headland or bluff on the northern end of the beach. Whilst the image may have been applicable during the initial stages of the LPS process, as flagged by several representations, it is dated. The central area highlighted located at the end of Home Avenue has since been subdivided (Planning Permit DAS-2018-15, effective as of 8 January 2020), with subsequent commencement or completion of a significant number of dwellings within the last couple of years. Native vegetation is still present, but it is confined to the publicly owned land or higher on the Bluff.



Figure 13: Image sourced from Council's Supporting Report; however, development has occurred since the image was taken.

Council's LPS Supporting Report states:

This neighbourhood is unique, differing from other neighbourhoods in Kingborough because of its scenic amenity and the fact that there are only a few remaining larger lots in the precinct that can provide the opportunity to further subdivide or to develop with units. The majority of the remaining 'undeveloped' lots in the precinct contain older houses and vegetation reflective of the historical character of the area. (p.73)

The Neighbourhood Character Assessment that formed the base research for the SAP, provides a detailed analysis of the area in terms of spatial quality of uniqueness to Blackmans Bay, the prominence of dwellings that derive from the area originating from being a shack community, specifically several of the current dwelling being identified as being present from 1958. The SAP does not apply to General Residential Zoned land fronting Powell Road. Regarding the reset of the SAP there is no significant historic character that is presented by the built form within land contained by Talone Road and Blowhole Road for General Residential Zoned land. Land closer to the foreshore that is zoned Low Density Residential does have a greater density of older buildings. However, the presence of a building on the same location as within an image in 1958 does not equate to the same or unmodified building present today. Although there are several buildings within the area that have shack origins, this is consistent throughout the older area of Blackmans Bay. There is no distinct urban form or historic appearance that delineates the General Residential Zoned land from the surrounding area that is of the same zone to warrant the application of the SAP for this purpose.

The fact that there are some larger lots and dwellings of historic origin is reflective of a mature urban suburb, that shows diversity in building ages, property sizes, and design. No heritage survey in the form of a Statement of Significance has been undertaken that supports the justification of historic significance to the SAP applies, to provide clear justification pursuant to clause LP1.5 of the SPPs.

Environmental and landscape values in particular the visual amenity to Blackmans Bay Beach are cited as justification for the SAP. A review of threatened species sighting in the last ten years indicates that there is a slightly stronger observation occurrence at the southern end of the Bluff than the surrounding area¹⁶. However, it is also observed that most of the area where priority vegetation occurs is either located on public land or larger lots proposed to be zoned Low Density Residential¹⁷.

Blackmans Bay SAP includes larger lots with vegetation surrounding the established buildings; however, it is noted that these larger lots along the foreshore of the southern end of Talone Road and Blowhole Road are zoned Low Density Residential, significantly limiting the capacity for further development. By default, development is minimised, and space is provided minimising impact on vegetation. The SAP does seek to protect the environmental values of the area, noting that under the application standards for the Natural Assets Code cl. C7.2.1 of the SPP, the priority vegetation overlay does not apply to either the General Residential Zone or the Low Density Residential Zone. The SAP does introduce additional standards on the management of native vegetation within this space for these two zones



Figure 14: Blowhole Road. The vacant cleared lot on the left of the image is zoned Low Density Residential and subject to the SAP, whilst the public land on the right contains established native vegetation and is proposed to be zoned Environmental Management but is not subject to the SAP. (Source: T. Henderson)

¹⁶ Appendix C: Map 2a: Blackmans Bay Bluff SAP Regional Natural Values Characteristics.

¹⁷ Appendix C: Map 2b: Blackmans Bay Bluff SAP Natural Values Characteristics



If vegetation retention is considered integral to maintaining the visual and environmental qualities of Blackmans Bay Bluff, the restriction of SAP controls solely to private land raises questions about the coherence and completeness of the approach, particularly where significant vegetation is also located on adjacent public land. This is particularly relevant in relation to the fact that pursuant to clause 5.3.3 vegetation removal that meets the exemption requirements on private land that is associated with a private garden does not require planning permission.

Within the Low-Density Residential Zone, there is a defensible basis for additional guidance or controls relating to multiple dwellings, having regard to landscape sensitivity, established development patterns and the potential for cumulative visual and environmental impacts.

The review also identifies inconsistencies between the distribution of identified environmental values and the extent of the SAP boundary. In particular, Figure 14 demonstrates that areas containing substantial native vegetation and environmental values may fall outside the SAP area, while cleared and previously developed land remains subject to additional controls. This does not mean that no additional controls are warranted; however, it raises questions regarding the spatial targeting and proportionality of the current SAP extent.

The purpose of the SAP is to delineate a location that is distinctively different from the surrounding area. Having regard to the social, economic, and environmental benefits set out by Section 34(2) of LUPAA, it is considered that insufficient evidence has been presented to support the application of Blackmans Bay Bluff SAP as it is presented.

This does not mean that no additional planning response could ever be justified for Blackmans Bay Bluff. Rather, it indicates that the current SAP extent and drafting are not sufficiently supported by the evidence reviewed. A narrower, issue-specific control may be capable of justification if it is clearly linked to demonstrated landscape, vegetation, built form or development intensity risks.

6. Assessment of SAP Justification and Strategic Merit

This section considers whether a SAP remains the appropriate planning tool for the issues identified in each location, and whether the proposed controls are sufficiently clear, proportionate and supported by evidence. The assessment distinguishes between two related questions. The first is whether SAPs remain a valid planning mechanism within the Tasmanian Planning Scheme framework where standard zone and code provisions do not adequately respond to local conditions. The second is whether each SAP area is sufficiently justified in its current extent and form.

For Bruny Island, the review confirms that a SAP remains justified in principle. The island is subject to a combination of environmental sensitivity, constrained servicing, dispersed settlement, landscape exposure and cumulative development pressure. These issues are not confined to a single site or settlement and are not adequately managed through the SPPs alone. The SAP therefore remains a legitimate mechanism for applying locally tailored controls, provided those controls are refined to improve spatial targeting, drafting clarity and proportionality.

For Bonnet Hill, the review also supports the continued use of a SAP in principle. The area has identifiable landscape and environmental characteristics, including visual prominence, vegetation values, established low-density settlement patterns and potential pressure for further intensification. These matters provide a reasonable planning basis for additional controls beyond the SPPs alone, subject to refinement of mapping, thresholds and assessment triggers.

The position for Blackmans Bay Bluff is different. The review identifies some matters that may warrant further planning guidance, particularly in relation to landscape sensitivity, vegetation retention, built form and development intensity. However, the evidence currently available does not demonstrate that the SAP, in its present extent and form, is a proportionate or sufficiently justified response. Further evidence, spatial narrowing or reconsideration of the current SAP boundary is required before the same level of support can be reached.

The strategic merit assessment therefore supports the SAP mechanism, but not uniformly across all SAP areas. Bruny Island and Bonnet Hill are supported in principle, subject to refinement. Blackmans Bay Bluff is not supported in its current form, although narrower or issue-specific controls may be capable of justification if clearly linked to demonstrated planning risks.



The need for localised controls arises because the relevant planning issues are not always capable of being managed through standard provisions applied on a site-by-site basis. On Bruny Island, incremental vegetation removal, wastewater intensification, dispersed settlement growth and pressure on limited infrastructure can have cumulative effects that are not adequately addressed through individual development assessments. In Bonnet Hill, landscape prominence, vegetation retention and development intensity require more locally calibrated controls than those provided by standard zone provisions. In Blackmans Bay Bluff, the issue is not whether some localised planning response may be justified, but whether the current SAP is sufficiently aligned with the values and risks it seeks to manage.

In practical terms, the limitations of the SPPs arise at the point of application. Development is assessed individually, with limited capacity to account for cumulative or location-specific impacts across a broader settlement or landscape context. Standard provisions are not well equipped to regulate vegetation removal in residential zones and the agricultural zone for Bruny Island, manage visually exposed development, address wastewater intensification in unsewered areas, or respond to the cumulative effect of incremental development over time.

Where justified, a SAP can address this gap by applying controls that are tailored to the environmental capacity, servicing constraints and landscape characteristics of a particular place. The purpose of the SAP framework is not to impose additional regulation for its own sake, but to ensure that development assessment better reflects the planning risks present in each location. For that reason, any retained SAP provisions must remain closely tied to the evidence, spatially targeted, and proportionate to the issue being managed.

6.1 SAP Justification

The findings in this section are not uniform across all SAP areas. The Bruny Island SAP and the Bonnet Hill component of KINS7.0 are supported in principle, subject to refinement. The Blackmans Bay Bluff component is considered separately because the current evidence does not support the SAP in its present extent and form. The area profiles identify the local characteristics and planning constraints relevant to each SAP area. This section then considers whether those characteristics provide a sufficient basis for locally tailored planning controls.

6.1.1 Bruny Island and Bonnet Hill

The Bruny Island SAP and the Bonnet Hill component of KINS7.0 are justified in principle because the application of the SPPs alone is not sufficient to manage the demonstrated characteristics and planning risks of those areas.

For Bruny Island, those risks arise from the interaction of environmental sensitivity, dispersed settlement, constrained infrastructure, wastewater limitations, landscape exposure and cumulative development pressure. These matters are not confined to a single site or settlement and cannot be managed adequately through individual development assessment alone.

For Bonnet Hill, the justification arises from the relationship between landscape prominence, vegetation values, established low-density settlement patterns, visual sensitivity and potential development intensity. The area has identifiable landscape and environmental characteristics that warrant additional local controls, provided those controls are clearly drafted, spatially targeted and supported by transparent mapping.

In both locations, the relevant characteristics of the land are sufficiently connected to the need for provisions that supplement or modify the standard provisions of the TPS. This supports the use of SAP provisions, subject to the refinements identified in this report.

6.1.2 Blackmans Bay Bluff

The Blackmans Bay Bluff component requires a different conclusion. The review identifies some matters that may warrant further planning guidance, particularly in relation to landscape sensitivity, vegetation retention, built form and development intensity. However, the evidence currently available does not demonstrate that the SAP, in its present extent and form, is a proportionate or sufficiently justified response. For that reason, the positive findings in this section should not be read as applying to Blackmans Bay Bluff unless expressly stated. If the SAP is to continue for Blackmans Bay Bluff, it should be narrowed to matters and locations that are clearly justified by evidence or supported by further technical and strategic work.

6.2 Natural values and assessment methodology

Council's supporting material identifies natural values within the SAP areas using publicly available datasets, including TASVEG native vegetation mapping, records from the Natural Values Atlas (NVA), LIST spatial layers identifying waterways, wetlands and geoconservation features, and statutory listings under the *Threatened Species Protection Act 1995* (TSP) and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC). These sources provide an appropriate starting point for identifying environmental values. However, the review also recognises that SAP provisions must be clear about how those datasets are used, how they trigger assessment, and how applicants and decision-makers can verify the relevant values.

During the assessment of the draft LPS, concerns were identified regarding the clarity and operation of earlier natural values provisions. In particular, earlier drafting relied on terminology that was complex or insufficiently defined, did not clearly explain the methodology for identifying values, and did not provide a sufficiently transparent basis for consistent decision-making. The refined approach should therefore define natural values by reference to mapped vegetation communities, listed threatened species and habitat, identified geoconservation values, and mapped waterways and wetlands. This reduces reliance on broad descriptors and assists in ensuring that relevant values can be verified using publicly available information.

The provisions should also distinguish clearly between direct and indirect impacts. Direct impacts should be limited to physical disturbance or modification of identified values. Indirect impacts should only be recognised where they are a foreseeable and substantial consequence of the proposed use or development, and where there is a sufficient connection between the development and the impact identified.

A structured assessment pathway is also required. This should require identification of relevant natural values, assessment of potential direct and indirect impacts, and consideration of avoidance, minimisation and mitigation measures. Where residual impacts remain, any offset or compensatory response should only be relied upon where impacts cannot reasonably be addressed through siting, design or management measures.

As explored by this report, a key justification for the SAPs has been the presence of environmental values that are not otherwise captured by the standard operation of the Tasmanian Planning Scheme (TPS). Conventionally, environmental values are managed through the Priority Vegetation Area provisions within the Natural Assets Code. However, pursuant to Guideline No. 1 (NAC13) and clause C7.2.1 of the TPS, the Priority Vegetation Area does not apply to land in the Agricultural Zone and, within the Low Density Residential Zone, generally only applies in association with subdivision. The justification for the SAP provisions has therefore been that additional controls are required to manage environmental values in circumstances where the Priority Vegetation Area provisions do not apply.

It is important to recognise, however, that clause 5.3.3 of the TPS provides that SAPs do not override the exemption provisions in clause 4.0 of the Scheme. Consequently, vegetation management within a private garden remains exempt under clause 4.4.2. In practice, many developed properties within the Low Density Residential Zone may satisfy the definition of a private garden. Similarly, clause 4.4.1 exempts the harvesting of timber, clearing of trees, clearing or conversion of a threatened native vegetation community, or disturbance undertaken in accordance with a certified Forest Practices Plan under the *Forest Practices Act 1985*. While separate authorisations may still be required, those activities are not assessed against the SAP provisions.



Additional exemptions also apply to activities such as infrastructure works and bushfire hazard management. Consequently, while a SAP may provide an additional layer of environmental protection in some circumstances, its operation remains subject to the broader exemption framework established by the TPS and other statutory approval processes.

6.3 Relationship with the SPPs and regional policy

The SAP provisions are intended to operate alongside the SPPs, including the Natural Assets Code. They should not duplicate the Code or create parallel assessment requirements where existing provisions already operate effectively. Their role is to provide additional localised guidance where the standard provisions do not adequately respond to the particular environmental, landscape, infrastructure or spatial characteristics of the land.

For Bruny Island and Bonnet Hill, the suggested refinements of this report for the provisions provide a practical mechanism for implementing relevant strategic planning outcomes at the local level. They assist in ensuring that development responds to environmental values, identified constraints and cumulative planning risks in a manner that is orderly, sustainable and consistent with the broader planning framework.

On this basis, the Bruny Island SAP and the Bonnet Hill component of KINS7.0 satisfy the relevant strategic justification requirements, subject to the refinements identified in this report. The Blackmans Bay Bluff component does not presently satisfy the same threshold in its current extent and form and should either be narrowed to clearly justified matters or reconsidered as part of the final SAP package.

6.4 The Concern with Bruny Island SAP

A key characteristic of the planning issues within the SAP areas is that individually minor changes, including vegetation removal, incremental built form, and increases in wastewater loading, have the potential to result in cumulative impacts that are disproportionate to the scale of any single development.

SPPs under the zones do not provide a mechanism for managing visibility-based coastal height constraints, scenic exposure, or external finishes. Locally tailored height and siting controls are therefore necessary to maintain the landscape qualities that underpin both community identity and the island's tourism economy. When considered together, the evidence shows that Bruny Island is subject to a unique combination of constraints

There is no consistent relationship between zoning and development capacity, lot size, and suitability, nor location and infrastructure access. Instead, development potential varies significantly across the Island. The implication for planning is that a standard, uniform planning framework does not adequately reflect these conditions.

The SAP framework is therefore required to address these cumulative effects through a coordinated and place-based response, rather than relying on case-by-case discretionary assessment.

A SAP provides an appropriate mechanism to:

- respond to local variations in constraint and capacity
- manage cumulative development impacts
- align development with infrastructure and environmental limits; and
- provide clarity and consistency in decision-making.

Collectively, this evidence demonstrates that the area exhibits distinct environmental, social, and spatial characteristics consistent with the matters contemplated under section 32 of the *Land Use Planning and Approvals Act 1993*.

7. Compliance within Policy Frameworks

This chapter assesses the SAPs against the relevant statutory and policy frameworks that govern the preparation and certification of the LPS. The purpose of this assessment is to confirm that the SAPs, operate lawfully, consistently, and proportionately within the structure of the TPS in their current form; or with suggested achievable refinements.

The assessment focuses on two key layers of the framework:

- compliance with section 32 of the Land Use Planning and Approvals Act 1993, which establishes the statutory basis and justification for including local variations within a LPS; and
- alignment with the objectives of the Resource Management and Planning System of Tasmania (RMPS), which provide a broader, system-level test of whether the planning framework delivers sustainable and balanced land use outcomes.

This chapter does not revisit the strategic need for the SAPs, which has been established in earlier sections. Rather, it examines whether the SAPs, as planning instruments, meet the statutory requirements for inclusion in the planning scheme and whether they can function effectively within that framework.

Importantly, the refinements identified in the following section do not alter the underlying justification for the SAPs, but are directed to improving clarity, proportionality, and workability. These refinements respond to identified deficiencies in drafting, mapping, and application, and are necessary to ensure that the SAPs operate consistently with the requirements of section 32 of the Act. In this context, the need for refinement arises from the form of the provisions, rather than from any deficiency in the underlying strategic or statutory basis for the SAPs.

7.1 Section 32 of the LUPAA

Section 32 of the *Land Use Planning and Approvals Act 1993* establishes the statutory test for including provisions within a LPS that vary, supplement, or refine the SPPs. In the context of SAPs, it provides the primary legal framework for determining whether place-based planning controls are justified, appropriate and capable of certification.

The assessment below considers the SAPs against the key components of section 32, including:

- consistency with the structure and operation of the TPS;
- the proper role and function of SAPs as a planning instrument;
- the justification for variation to the SPPs, including the requirement to demonstrate significant environmental, social, or economic benefit; and
- the necessity, proportionality, and workability of the SAP provisions relative to alternative mechanisms within the planning framework.

The assessment has been undertaken from a practical implementation perspective, concerning how the SAPs operate in the assessment of use and development. This includes consideration of whether the provisions are:

- clearly expressed and capable of consistent interpretation
- supported by an appropriate evidentiary basis
- proportionately targeted to identified planning risks; and
- integrated with underlying zones and SPPs.

The findings are presented in Table 4 as a structured compliance assessment. Where the assessment identifies that compliance is dependent on refinement, this reflects issues of drafting, mapping, or implementation, rather than any fundamental deficiency in the statutory basis for the SAPs.



Importantly, the refinements identified in this report do not alter the underlying strategic rationale for applying additional local planning controls where they are supported by evidence. Rather, the refinements are directed toward improving clarity, proportionality, transparency and operational effectiveness. They respond to identified deficiencies in drafting, mapping and implementation, and are necessary to ensure that any retained SAP provisions operate consistently with the requirements of section 32 of LUPAA.

The section 32 assessment is applied on a differentiated basis. The Bruny Island SAP and the Bonnet Hill component of KINS7.0 are capable of satisfying the relevant section 32 requirements, subject to the refinements identified in this report. In both cases, the assessment indicates that the relevant environmental, landscape, infrastructure and spatial characteristics of the land provide a sufficient basis for additional local planning controls beyond the SPPs.

The position for Blackmans Bay Bluff is different. While some targeted controls may be capable of justification, the evidence presently available does not demonstrate that the SAP, in its current extent and form, is necessary, proportionate or sufficiently linked to the planning risks relied upon in support of the controls. Accordingly, the Blackmans Bay Bluff component is not supported in its current form.

Where Table 4 refers to SAPs generally, those findings should be read as applying to the Bruny Island SAP and the Bonnet Hill component of KINS7.0, unless Blackmans Bay Bluff is expressly identified.

Table 4: Section 32 Compliance Assessment

s.32 Requirement	Test	Response	Evidence	Conclusion
s.32(2) – Consistency with the TPS	Do the SAPs operate within the structure of the TPS and not conflict with administrative provisions?	The SAPs are structured and operate consistently with the Tasmanian Planning Scheme framework. They function as a permitted mechanism within the LPS and do not override or conflict with administrative or general provisions.	This assessment finds that the SAP provisions are framed to operate in conjunction with the underlying zones and codes, consistent with clause 5.3 of the Scheme. They are used to add to, modify or substitute specific use and development standards where necessary, while maintaining the integrity of the Scheme's hierarchy. In this context, the SAPs do not displace or alter administrative provisions, including interpretation, exemptions, scheme operation, or assessment processes, which continue to apply in full. They do not introduce an alternative assessment pathway but instead refine the content of applicable standards within the existing statutory framework.	Compliant at framework level The SAP mechanism is capable of operating within the TPS structure. This does not, of itself, confirm that each SAP area is justified in its current extent or form.
s.32(2) – Proper role and function of SAPs	Are the SAPs used appropriately as targeted place-based planning controls, rather than substituting for zoning or broader strategic planning?	The SAPs are used appropriately as a place-based planning mechanism to refine and calibrate development controls in response to localised conditions. They	This assessment finds that the SAPs have been applied to address clearly identified localised planning constraints, including environmental sensitivity, infrastructure limitations, cumulative development impacts, and landscape exposure, which are not adequately managed through zoning or standard code provisions alone. The underlying zones continue to establish the primary land use intent and strategic framework, while the SAPs operate in conjunction with those zones by introducing	Compliant SAP provisions should remain tightly scoped to localised constraints and avoid expanding into strategic or zoning functions.

s.32 Requirement	Test	Response	Evidence	Conclusion
		do not replace zoning, nor do they perform a broader strategic or policy-making role.	additional or modified standards where necessary to respond to those constraints. The SAPs are not used to correct or override zoning decisions or wider strategic settings, but instead provide targeted, spatially specific controls within defined areas where a higher level of planning response is required. This reflects the intended function of SAPs as a selective and proportionate tool, applied only where standard provisions are demonstrably insufficient.	Ongoing discipline required to ensure provisions are targeted and do not substitute for broader planning frameworks.
s.32(4) – Justification for variation to SPPs	Is there a clear need to vary or supplement SPPs?	A clear, evidence-based need exists to supplement the SPPs, as the standard provisions are not capable of effectively managing the specific planning risks present within the subject areas.	This assessment finds that the SPPs, as a standardised statewide framework, are not designed to address the combined and location-specific planning challenges arising within the SAP areas. In particular, the SPPs do not adequately manage cumulative impacts associated with incremental development, including vegetation removal, landscape degradation, and infrastructure loading, particularly in Low Density Residential and Agriculture zones where key controls do not consistently apply. The provisions also do not provide effective mechanisms to regulate wastewater intensification outside of subdivision in unsewered environments, nor do they adequately address visual exposure, scenic impacts, or built form outcomes in highly visible coastal and landscape settings. These limitations arise from the interaction of multiple factors - including environmental sensitivity, constrained infrastructure capacity, dispersed settlement patterns and high levels of development and visitor pressure - which collectively create planning risks that cannot be resolved through single-issue, code-based assessment. The evidence demonstrates that, in the absence of locally tailored provisions, these risks would be managed through discretionary assessment alone, resulting in inconsistent, uncoordinated,	Satisfied for Bruny Island and Bonnet Hill, subject to refinement. Not presently satisfied for Blackmans Bay Bluff in its current extent and form.

s.32 Requirement	Test	Response	Evidence	Conclusion
			and potentially cumulative adverse outcomes. Accordingly, the SAPs provide a necessary and proportionate mechanism to introduce targeted, place-based planning controls that address these identified gaps in the operation of the SPPs.	
s.32(4)(a) – Significant environmental benefit	Does the SAP deliver a significant environmental benefit that justifies variation to, or supplementation of, the SPPs?	The Bruny Island SAP and Bonnet Hill component are capable of delivering a significant environmental benefit by providing a targeted statutory framework to protect sensitive vegetation communities, threatened species habitat, landscape values and environmentally constrained land that are not adequately or consistently managed through the SPPs alone.	This assessment finds that the SAP areas contain extensive native vegetation, including dry coastal forests, wet eucalypt communities, heathlands, mature habitat trees, and other mapped natural values, together with habitat supporting threatened and significant fauna, including the Swift Parrot and the Forty-spotted Pardalote. It also identifies sensitive coastal landforms, visually prominent slopes, geoconservation values, and constrained environments where environmental outcomes are vulnerable to incremental change. In Bruny Island particularly, the report explains that parts of the relevant vegetation and habitat are not sufficiently managed through the Natural Assets Code because the Priority Vegetation Area provisions do not apply consistently across the Agriculture and Low Density Residential zones. This assessment further finds that the standard SPP framework does not adequately address cumulative ecological effects arising from repeated small-scale vegetation removal, disturbance associated with residential and visitor-related development, or wastewater intensification in unsewered environments. The SAPs respond to those gaps by introducing place-based planning controls directed to vegetation removal, ecological disturbance, landscape exposure, and environmentally constrained development, thereby reducing the risk of progressive degradation that would otherwise occur through ad hoc or	Satisfied for Bruny Island and Bonnet Hill, subject to mapping and drafting refinement. For Blackmans Bay Bluff, further evidence or a narrower spatial application is required.

s.32 Requirement	Test	Response	Evidence	Conclusion
			case-by-case assessment under standard provisions alone.	
s.32(4)(b) – Significant social benefit	Does the SAP deliver a significant social benefit that justifies variation to, or supplementation of, the SPPs?	The Bruny Island SAP and Bonnet Hill component are capable of delivering a significant social benefit by providing a clearer, more predictable and place-based planning framework aligned with the characteristics of those locations.	This assessment finds that the SAP areas are characterised by established patterns of low-density settlement, strong landscape and environmental attributes, and a high level of community attachment to local character, scenic quality, and amenity. Consultation and representations confirm concern regarding incremental change, vegetation removal, landscape degradation, and the perceived lack of proportionality and clarity in the application of standard planning provisions. The SAPs respond to these issues by introducing spatially targeted controls that better align development outcomes with the existing character and capacity of each area. This includes maintaining low-density development patterns, managing visually prominent built form, and providing clearer direction on vegetation retention and environmental constraints. In doing so, the SAPs reduce reliance on broad discretionary assessment and provide a more predictable and transparent framework for both applicants and the community. Importantly, the social benefit is not limited to reflecting community preference but arises from the improved operation of the planning system itself. For Bruny Island and Bonnet Hill, the SAP framework enhances consistency in decision-making, reduces uncertainty associated with interpretation of standard provisions, and provides a clearer articulation of how development should respond to local context.	Satisfied for Bruny Island and Bonnet Hill, subject to refinement. For Blackmans Bay Bluff, potential social benefit may exist through clearer landscape or character controls but is not sufficiently demonstrated for the SAP as currently drafted.
s.32(4)(c) – Significant economic benefit	Does the SAP deliver a significant economic benefit that justifies variation to, or	It is likely that the Bruny Island SAP and the Bonnet Hill component will deliver an economic benefit by supporting sustainable land	This assessment finds that the SAP areas, particularly Bruny Island, are subject to high levels of visitor demand and ongoing development pressure relative to their environmental and infrastructure capacity. These conditions place increasing strain on key economic assets, including	Likely satisfied for Bruny Island and Bonnet Hill, subject to refinement.



s.32 Requirement	Test	Response	Evidence	Conclusion
	supplementation of, the SPPs?	use outcomes that protect environmental, landscape and infrastructure assets.	landscape values, environmental quality, and tourism-dependent amenity, as well as on limited infrastructure systems such as wastewater, access, and servicing. The SAPs respond to these constraints by ensuring that development occurs at a scale and intensity consistent with the capacity of the land and available services. This reduces the risk of overdevelopment that could undermine the environmental and landscape qualities underpinning the visitor economy, while also avoiding inefficient infrastructure outcomes, such as cumulative failure of onsite wastewater systems or the need for reactive and unplanned service upgrades. In addition, the SAPs contribute to more efficient and orderly development by providing clearer guidance on development expectations and constraints. This reduces uncertainty for proponents, supports more predictable investment outcomes, and limits reliance on case-by-case discretionary assessment that can lead to inconsistent or contested decisions. Importantly, the economic benefit arises not only from promoting development opportunity, but from ensuring that development is aligned with long-term environmental and infrastructure capacity. In this way, the SAPs protect the ongoing viability of key economic activities, particularly tourism, while supporting a more coordinated, sustainable, and cost-effective pattern of growth.	Not relied upon as a primary justification for Blackmans Bay Bluff unless further evidence is provided.
Need for SAP vs zoning/codes alone	Are SAPs necessary to achieve the intended planning outcomes, or could those outcomes be achieved through zoning	SAPs are necessary, as the intended planning outcomes cannot be effectively or consistently achieved through zoning and	This assessment finds clear and substantive limitations in the operation of the SPPs when applied to the subject areas. In particular, standard zoning and code provisions do not adequately address cumulative impacts arising from incremental development, including vegetation removal, landscape degradation, and infrastructure loading, as they assess	Justified for Bruny Island and Bonnet Hill. Not presently justified for Blackmans Bay Bluff in its current extent

s.32 Requirement	Test	Response	Evidence	Conclusion
	and standard code provisions alone?	standard code provisions alone.	development on an individual application basis without a mechanism to manage aggregate effects over time. This assessment further finds that existing provisions do not provide sufficient or consistent control over key planning issues, including the intensification of wastewater outside subdivision in unsewered environments, the removal of native vegetation in zones where relevant overlays do not apply, and the management of visually prominent development within sensitive landscape settings. These gaps result in a reliance on discretionary assessment frameworks that are not designed to address combined or location-specific constraints, leading to variability in decision-making and reduced certainty of outcomes. Alternative mechanisms within the TPS, including zoning or code-based responses alone, cannot provide the necessary level of spatial targeting or integrated response to these issues without introducing broader or disproportionate changes to the planning framework. The SAPs, by contrast, provide a targeted and proportionate mechanism to apply locally specific controls within defined areas, enabling consistent, transparent and risk-based decision-making. In the absence of SAPs, development would continue to be assessed under provisions that are not calibrated to the specific environmental, infrastructure and landscape constraints present, increasing the likelihood of inconsistent outcomes and cumulative adverse impacts.	and form, although narrower controls may be capable of justification if supported by further evidence.
Proportionality and targeting	Are the SAP controls proportionate to the identified planning risks and spatially targeted to	The SAPs can achieve a proportionate and spatially targeted response, with the report identifying and implementing	This assessment recognises that earlier iterations of the SAPs gave rise to concerns regarding scope and proportionality, particularly where controls were applied broadly without sufficient spatial differentiation. In response, the assessment undertakes a detailed evaluation of environmental,	Capable of compliance for Bruny Island and Bonnet Hill, subject to refinement.

s.32 Requirement	Test	Response	Evidence	Conclusion
	where those risks arise?	refinements to ensure controls are applied only where justified by demonstrated planning risk.	landscape and infrastructure constraints to identify where additional planning controls are warranted and where standard provisions remain appropriate. The preferred approach adopts a refined and restructured SAP framework that retains controls only in locations where there is a clear nexus between the identified planning risk and the regulatory response. This includes areas of high environmental sensitivity, constrained wastewater capacity, visually prominent landforms, and locations where cumulative impacts are demonstrably likely. This assessment identifies the need for clearer thresholds, definitions, and mapping to ensure that controls are applied consistently and are linked to measurable or identifiable characteristics, rather than broad or subjective criteria. Importantly, the approach reduces reliance on blanket or island-wide application of controls and instead promotes more precise spatial targeting, including the potential use of precincts or differentiated provisions where appropriate. This ensures that regulatory burden is commensurate with risk and avoids unnecessary constraint on development in areas where additional controls are not justified.	Blackmans Bay Bluff requires narrowing or further evidence to demonstrate proportionality.
Clarity, transparency and workability	Are the SAP provisions capable of being applied consistently, transparently and predictably in the assessment of use and development?	The SAPs are capable of compliant and effective operation but require targeted refinement to ensure they are drafted with sufficient clarity, transparency and internal consistency to support	This assessment finds several specific deficiencies in the current form of the SAPs that bear directly on workability and statutory defensibility. These include uncertainty in mapping accuracy, insufficient transparency regarding the methodology and datasets relied on to trigger SAP provisions, the use of unclear or subjective terminology, and areas of duplication or tension with the SPPs. This assessment recognises that these issues can lead to inconsistent interpretation, reduce confidence in how	Capable of compliance, subject to targeted refinement. For Blackmans Bay Bluff, workability alone is not sufficient; the spatial and evidentiary justification



s.32 Requirement	Test	Response	Evidence	Conclusion
		predictable decision-making.	provisions will operate in practice, and increase reliance on subjective planning judgment. In response, the report proposes a clear refinement pathway, including improved drafting discipline, defined terminology, clearer thresholds and triggers, transparent and auditable mapping methodology, and a more coherent structure that aligns the SAPs more closely with the Tasmanian Planning Scheme framework. These measures are directed to ensuring that the SAPs (and in particular the provisions) can be read, understood, and applied consistently by decision-makers, applicants, and the community.	must also be resolved.

The assessment identifies the following key areas for refinement across the SAP framework:

- Improved spatial targeting, including use of mapped areas and precinct-based approaches
- Clearer thresholds and triggers for assessment
- Enhanced mapping transparency and evidentiary clarity
- Refinement of drafting, definitions, and terminology to improve consistency and predictability
- Stronger alignment with infrastructure capacity and environmental constraints
- Removal of duplication or conflict with SPPs; and
- Continued discipline to ensure SAPs remain targeted and proportionate, and do not substitute for broader strategic planning.

7.2 RMPS Assessment

The Resource Management and Planning System of Tasmania (RMPS) establishes the overarching objectives that guide the use, development and protection of land and natural resources throughout the State. The RMPS assessment provides a high-level evaluation of whether the SAPs, as components of the Local Provisions Schedule, support outcomes that are consistent with those objectives. The assessment therefore focuses on whether the SAP provisions are justified, capable of effective administration and appropriately aligned with the planning issues they are intended to address.

Not all RMPS objectives are engaged equally by the SAP framework. SAPs perform a targeted role within the planning system and are directed toward specific planning issues rather than broader strategic planning outcomes. Accordingly, the assessment considers the extent to which the SAPs support the intent of the RMPS within the scope of their statutory function.

The assessment indicates that the Bruny Island SAP and the Bonnet Hill component of KINS7.0 are capable of supporting outcomes consistent with the objectives of the RMPS, subject to the refinements identified in this report. In both instances, the SAP framework responds to planning issues that are not adequately addressed through standard provisions alone, including environmental sensitivity, infrastructure constraints, landscape values and cumulative development impacts.

The position for Blackmans Bay Bluff is different. While the area exhibits some characteristics that may justify additional planning guidance or targeted controls, the evidence currently available does not demonstrate that the SAP, in its present extent and form, is sufficiently justified or proportionate. As such, further evidence, spatial refinement or reconsideration is required before the same conclusion can be reached.

The RMPS assessment is presented in tabular form to provide a transparent evaluation against each relevant objective. The assessment should be read together with the section 32 assessment, the strategic merit assessment in Chapter 6. Where compliance is identified as being subject to refinement, this reflects the need to improve drafting clarity, mapping transparency, proportionality and internal consistency, rather than any inconsistency with the intent of the RMPS itself.



Table 5: Objectives of the Resource Management and Planning System of Tasmania part 1

Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
Part 1 – 1(a)	This objective is directly relevant. The test is whether the SAP framework provides a planning response that enables development while protecting identified environmental values and ecological systems.	The SAPs are applied in areas where environmental sensitivity, habitat values and cumulative impact risks are not adequately managed through the underlying zones and SPPs. This is particularly evident in locations where incremental development has the potential to erode ecological values over time, even where individual proposals are low impact. The SAP framework responds to this by introducing more targeted and locally specific controls that address how development interacts with vegetation, landform and identified environmental constraints. In doing so, it shifts the assessment from a broad, generalised approach to one that is more closely aligned with the characteristics of the land. The review has identified that the previous form of the SAP provisions did not always achieve this in a clear or proportionate way. In particular, issues with mapping, definitions and the articulation of assessment triggers limited the consistency and defensibility of outcomes.	The SAP areas are characterised by significant environmental values, including native vegetation, habitat areas and landscape systems that are sensitive to incremental change. These areas are also subject to development pressures associated with dispersed settlement patterns, infrastructure limitations, and ongoing demand, all of which contribute to the risk of cumulative impact if not managed through a coordinated framework. The assessment consistently finds that standard provisions do not adequately manage this interaction across all locations, particularly where ecological values fall outside the scope or application of relevant codes.	Compliance with this objective is achieved through refinement of the SAP provisions to ensure they operate as intended. This includes: • clearer identification and mapping of environmental values • improved definitions and removal of ambiguity • assessment triggers aligned to demonstrated environmental risk • controls that specifically address vegetation, siting, and intensity • removal of overlap or inconsistency with SPPs These changes ensure the SAPs are capable of consistent and proportionate application.	Complies (subject to refinement) The SAP framework is consistent with this objective as it provides a mechanism to manage development in environmentally sensitive areas in a way that supports sustainable outcomes and protects ecological processes. This conclusion is dependent on the refinement of provisions to address identified issues of clarity, mapping, and proportionality.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		The refined SAP approach addresses these issues by improving the clarity of provisions, strengthening the link between controls and demonstrated risk, and ensuring that regulation is more precisely targeted. This supports a more balanced outcome where development can proceed, but not at the expense of ecological processes or environmental capacity.			
Part 1 – 1(b)	This objective is directly relevant. The test is whether the SAP framework results in development being managed in a coordinated and proportionate way, having regard to land capability, infrastructure capacity, and settlement pattern.	The SAPs provide a structured framework for managing development in areas where the underlying zones and standard provisions do not adequately respond to local conditions. This is particularly relevant in locations characterised by dispersed settlement, constrained infrastructure, and varying land capability, where uncoordinated development can lead to inconsistent and unsustainable outcomes. In these contexts, reliance on standard provisions alone creates a risk that development occurs incrementally without sufficient regard to cumulative effects, servicing limitations or the relationship between land use and environmental capacity. The SAP framework addresses this by	The SAP areas are subject to identifiable constraints, including limited or absent reticulated infrastructure, dispersed settlement patterns, and environmental sensitivity. These factors collectively limit the capacity for development to occur in a consistent and sustainable manner without a coordinated framework. The assessment identifies that, in the absence of the SAPs, development would rely more heavily on standard provisions that do not adequately address these combined constraints, increasing the risk of fragmented and inconsistent outcomes.	Compliance with this objective is achieved through the application and refinement of the SAP provisions, including: • spatially targeted application of controls • alignment of development intensity with infrastructure capacity • clearer assessment triggers linked to land capability and servicing constraints • improved consistency between SAP provisions and underlying zones	Complies The SAP framework provides an appropriate and necessary mechanism to ensure that development occurs in a fair, orderly, and sustainable manner in areas where standard provisions are insufficient.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		introducing more targeted controls that align development outcomes with the characteristics of the land and the capacity of available infrastructure. The refined SAP approach further improves this by narrowing the application of controls, clarifying assessment triggers, and ensuring that provisions are more closely linked to demonstrated planning risk. This supports a more orderly pattern of development and reduces reliance on ad hoc decision-making.		removal of ambiguity and unnecessary discretion These measures ensure that development is managed in a way that is both orderly and proportionate to the constraints of the land.	
Part 1 – 1(c)	This objective is only partially relevant. The test is whether the SAP framework itself facilitates or enables public participation in the planning process.	Public involvement in the planning system is primarily achieved through the statutory processes for preparing and exhibiting planning scheme provisions, rather than through the content of a SAP. In this case, the SAPs have been subject to a comprehensive consultation process, including formal exhibition, statutory representations, and additional engagement with community groups. The outcomes of that consultation have informed both the assessment of the SAPs and	The preparation of the SAPs involved a formal exhibition process supported by a high level of community engagement, including a significant volume of representations and additional consultation activities. This demonstrates that public participation has occurred through the statutory framework, with consultation outcomes directly informing the review and refinement of the SAP provisions.	Compliance with this objective is achieved through: - the statutory exhibition and representation process - consideration of representations within the assessment framework - integration of consultation outcomes into the refinement of SAP provisions - clear explanation of the role and limits of SAPs	Indirectly satisfied / not directly engaged Public participation is achieved through the broader statutory planning framework rather than through the SAP provisions themselves

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		the identification of issues requiring refinement. However, the SAP provisions themselves do not regulate or create mechanisms for public participation. Their role is limited to setting out planning controls and assessment criteria, rather than establishing or governing consultation processes.		within the broader planning system These processes ensure that community input is considered, while maintaining the statutory role of the SAP as a planning instrument.	
Part 1 – 1(d)	This objective is partially relevant. The test is whether the SAP framework enables development to occur in a way that is consistent with environmental constraints and infrastructure capacity, rather than directly promoting economic outcomes.	The SAPs do not act as an economic development tool in their own right. Their role is to establish how development is to occur in areas where environmental sensitivity, infrastructure limitations and cumulative impacts present a constraint to growth. In this context, the SAP framework supports economic activity by providing clearer parameters within which development can proceed. This is particularly relevant in areas subject to ongoing tourism demand, where pressure for development exists but must be carefully managed to avoid undermining the environmental and infrastructure systems that support that activity.	The assessment identifies ongoing development pressure, particularly associated with tourism, in areas that are constrained by limited infrastructure, environmental sensitivity and dispersed settlement patterns. These pressures create a clear need to manage the scale and intensity of development, rather than to promote it, to avoid cumulative impacts on infrastructure, landscape and environmental values.	Compliance with this objective is achieved through: - controls that align development intensity with infrastructure capacity - provisions that respond to environmental constraints and land capability - spatial targeting of controls to areas where risk is demonstrated - refinement of triggers and standards to avoid unnecessary restriction while preventing over-intensification This ensures that development can occur, but within limits that maintain the long-term	Complies (indirectly) The SAP framework facilitates economic activity in a controlled and sustainable manner, consistent with the broader objectives of the planning system.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		Without this framework, there is a risk that development occurs in an uncoordinated manner, leading to incremental intensification that is not aligned with land capability or servicing capacity. This would undermine both environmental outcomes and the long-term viability of economic activity in those locations. The SAPs therefore facilitate development indirectly by ensuring that it is undertaken in a way that is sustainable, proportionate, and consistent with the broader objectives of the planning system.		sustainability of the resource base.	
Part 1 – 1(e)	This objective is partially relevant. The test is whether the SAP framework contributes to a coordinated approach to planning consistent with the broader statutory system, rather than establishing governance arrangements.	The SAPs operate as part of the Tasmanian Planning Scheme and are implemented through the LPS. In this context, responsibility for planning outcomes is shared across State agencies, the planning authority, and the community through established statutory processes. The SAP framework does not create new governance structures or allocate responsibility between parties. Its role is limited to setting out how use and development is to be assessed in specific locations. However, by providing clearer and more targeted	The SAPs form part of an integrated planning system that includes the SPPs, the LPS and the statutory processes for public exhibition and consultation. Planning outcomes are informed by inputs from multiple stakeholders, including State agencies, the planning authority, and the community, with consultation outcomes directly influencing the refinement of SAP provisions.	Compliance with this objective is achieved through: - operation within the established TPS framework - integration with SPPs and the LPS - reliance on statutory consultation and representation processes - refinement of SAP provisions to support clear and consistent decision-making	Satisfied at framework level The SAP framework supports the sharing of responsibility for planning outcomes at a system level but does not independently establish or regulate that requirement.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		provisions, the SAPs support more consistent and transparent decision-making within that shared framework. The refinement of the SAPs further contributes to this by improving clarity, reducing ambiguity, and ensuring that responsibilities are exercised within a more structured and predictable planning context.		This ensures that planning responsibilities are exercised within a coordinated and recognised statutory structure.	

Table 6: Objectives of the Resource Management and Planning System of Tasmania part 2.

Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
Part 2 – (a)	This objective is directly relevant. The test is whether the SAP framework provides a coordinated and strategic response to planning issues that extend beyond the capability of standard provisions.	The SAPs function as a mechanism to implement strategic planning outcomes at a local level where the SPPs do not adequately address site-specific conditions. In this context, they provide a structured response to identified planning risks, including environmental sensitivity, infrastructure constraints, and cumulative impacts. Rather than introducing new strategic policy, the SAPs translate existing strategic intent into a more targeted and locally responsive framework. This supports better coordination between State-level provisions and local planning controls, ensuring that	The SAPs have been applied in areas where standard provisions have been identified as insufficient to manage combined environmental, servicing and settlement constraints in a consistent manner. The assessment demonstrates that, without a coordinated framework, these issues would be addressed on a piecemeal basis through discretionary assessment, increasing the	Compliance is achieved through: - alignment of SAP provisions with the structure and intent of the Tasmanian Planning Scheme - use of SAPs as a recognised statutory mechanism within the LPS - refinement of provisions to remove duplication and improve	Complies The SAPs provide a coordinated and strategically consistent response to local planning issues within the broader framework of the planning scheme.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		planning outcomes are consistent with the broader objectives of the Tasmanian Planning Scheme. The refined SAP approach strengthens this coordination by improving clarity, removing duplication, and aligning provisions more closely with demonstrated planning issues.	risk of inconsistent outcomes.	integration with SPPs ensuring controls are targeted to identified planning risks	
Part 2 – (b)	This objective is directly relevant. The test is whether the SAPs operate as a proper use of the planning instrument framework, rather than introducing ad hoc or inconsistent controls.	SAPs are an established component of the Tasmanian Planning Scheme and are intended to provide place-specific refinement where standard provisions are not sufficient. Their use in this instance is consistent with that role. The SAPs do not operate outside the planning system or introduce alternative mechanisms. Instead, they function within the LPS, modifying or supplementing existing provisions in a structured and transparent way. The refinement of the SAPs improves their alignment with this objective by ensuring they are clearly expressed, appropriately scoped and consistent with the broader structure of the scheme.	The SAPs are incorporated within the LPS and applied in accordance with established statutory requirements. Their use is limited to areas where additional controls are justified by local conditions, rather than applied broadly or inconsistently.	Compliance is achieved through: - use of SAPs as a recognised statutory planning instrument - consistency with the structure and requirements of the LPS - refinement of provisions to ensure clarity and avoid duplication - adherence to the scheme's framework for use and development controls	Complies The SAPs represent an appropriate and consistent use of the planning instrument system.
Part 2 – (c)	This objective is directly relevant. The test is whether the SAP framework enables a balanced and explicit	The SAP framework provides a structured basis for considering the effects of development beyond what is captured by standard provisions alone. This includes environmental impacts,	The SAP areas are affected by environmental constraints, infrastructure limitations, and strong community expectations, all	Compliance is achieved through: provisions that require	Complies (subject to refinement) The SAP framework supports a

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
	consideration of environmental, social, and economic effects.	infrastructure capacity, community expectations, and the cumulative effects of development over time. The assessment demonstrates that these factors are closely interrelated within the SAP areas. As such, a more detailed and place-specific framework is required to ensure that decisions accurately reflect this complexity. The refined SAP provisions improve this outcome by clarifying how impacts are identified and assessed, and by ensuring that controls are proportionate to the risks they are intended to manage.	of which influence the potential effects of development. These factors cannot be adequately considered in isolation and require an integrated assessment approach.	consideration of environmental constraints and impacts - alignment of development intensity with infrastructure capacity - incorporation of community concerns into the refinement process - improved clarity in assessment triggers and definitions	comprehensive consideration of environmental, social, and economic effects.
Part 2 – (d)	This objective is directly relevant. The test is whether the SAPs operate as an integrated component of the broader planning and policy framework.	The SAPs integrate a range of planning considerations, including environmental protection, infrastructure constraints, and settlement patterns, into a single coordinated framework. They do not operate in isolation, but in conjunction with the SPPs, underlying zones, and other applicable codes. This ensures that local controls are applied within the broader policy context, rather than in conflict with it. The refinement process improves this integration by addressing overlap and ensuring clearer alignment between	The SAP areas demonstrate overlapping environmental, social and infrastructure constraints that require a coordinated response. The planning framework reflects this by combining multiple considerations within the SAP provisions.	Compliance is achieved through: - alignment of SAP provisions with the broader structure of the planning scheme - removal of duplication or inconsistency with existing codes - integration of environmental and infrastructure considerations into assessment	Complies The SAPs operate as an integrated component of the broader planning framework.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		SAP provisions and other components of the scheme.		refinement to improve consistency and clarity	
Part 2 – (e)	This objective is directly relevant. The test is whether the SAPs assist in creating clearer and more coordinated assessment pathways.	The SAPs contribute to coordination of approvals by providing clearer development standards and assessment triggers, reducing uncertainty and reliance on case-by-case discretion. Earlier versions of the SAPs created potential for inconsistent interpretation due to unclear mapping and definitions. The refined provisions address this by establishing clearer thresholds and improving the transparency of the assessment process. This results in a more predictable and consistent framework for assessing proposals.	The review identified issues with clarity, mapping and definitions that affected consistency of assessment. Refinement has focused on resolving these issues to improve coordination of decision-making.	Compliance is achieved through: - clearer and more precise assessment triggers - improved mapping and definitional clarity - alignment between SAP provisions and underlying controls - reduction of ambiguity in the assessment process	Complies (improves with refinement) The SAPs improve coordination and clarity of the approval process, with further benefit gained through refinement.
Part 2 – (f)	This objective is directly relevant. The test is whether the SAP framework supports development outcomes that are safe and appropriate to the constraints of the land.	The SAPs contribute to safe and sustainable environments by ensuring development is consistent with infrastructure capacity, environmental constraints, and emergency management considerations. In areas such as Bruny Island, limitations in access, servicing and emergency response capacity mean that unmanaged intensification presents a clear risk. The SAP framework responds to this by limiting	Infrastructure constraints, including limited servicing and access, are identified as key planning risks within the SAP areas. These constraints directly influence the suitability and safety of development outcomes.	Compliance is achieved through: - controls that align development with infrastructure capacity - provisions addressing wastewater and servicing constraints	Complies The SAPs support the delivery of safe and appropriate development outcomes.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		development to a scale that can be safely accommodated.		- limits on intensity in constrained locations - consideration of emergency management capacity	
Part 2 – (g)	This objective is only partially relevant. The test is whether the SAPs directly address heritage conservation outcomes.	The primary focus of the SAPs is environmental, landscape and infrastructure-related planning issues. While aspects of character and landscape may overlap with heritage considerations, the SAPs are not designed as a heritage conservation mechanism. Where heritage or cultural values are present, these are more appropriately addressed through other provisions within the planning scheme or through separate statutory processes.	The SAP provisions primarily address environmental and landscape characteristics, rather than identified heritage values. Any reference to character is related to broader landscape and visual outcomes rather than formal heritage conservation.	Compliance is achieved indirectly through: - consideration of landscape and character values - operation within the broader planning framework where heritage is addressed separately	Indirectly satisfied The SAPs do not directly address heritage outcomes but may support them indirectly through related controls.
Part 2 – (h)	This objective is directly relevant. The test is whether the SAP framework ensures development aligns with infrastructure capacity and protects existing systems from cumulative pressure.	The SAPs respond directly to infrastructure constraints, particularly in relation to wastewater, access, and servicing capacity. These constraints are a defining feature of the SAP areas and represent a key planning risk if not managed appropriately. By introducing controls on development intensity and linking assessment to infrastructure capacity, the SAPs ensure that growth does not	The SAP areas are characterised by limited or absent reticulated infrastructure, constrained transport access, and reliance on local servicing solutions. These limitations create a clear need for planning controls that regulate the scale and intensity of development.	Compliance is achieved through: - controls limiting development intensity in constrained areas - alignment of proposals with available infrastructure - provisions addressing	Complies The SAPs provide a clear and necessary response to infrastructure constraints and support coordinated service provision.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		exceed the ability of existing systems to support it.		wastewater and servicing capacity spatial targeting of controls to areas of greatest constraint	
Part 2 – (i)	This objective is directly relevant. The test is whether the SAP framework responds to the inherent capability and constraints of the land, rather than applying a uniform approach to development.	The SAPs respond to areas where land capability is constrained by a combination of environmental sensitivity, servicing limitations, and physical site conditions. These constraints vary significantly across the SAP areas and are not adequately reflected through the application of standard provisions alone. In these circumstances, a uniform planning response risks allowing development outcomes that are not aligned with the capacity of the land, particularly where cumulative effects arise from incremental intensification. The SAP framework addresses this by introducing controls that are more closely aligned to the characteristics of the land, including how development intensity, siting and land disturbance are managed. This enables assessment to respond to variations in capability, rather than relying solely on zoning or generic standards. The refinement of the SAP provisions further strengthens this approach by improving mapping, clarifying assessment triggers, and ensuring that	The SAP areas are characterised by identifiable constraints affecting land capability, including environmental sensitivity, limited infrastructure and servicing, and variation in topography and physical conditions. These factors influence the suitability and scale of development and require a more tailored planning response than that provided by standard provisions. The assessment confirms that these constraints are a central driver for the application of the SAPs.	Compliance is achieved through: - mapping and identification of areas subject to environmental and physical constraints - controls that align development intensity with land capability - consideration of servicing and infrastructure limitations - refinement of provisions to ensure clarity and proportionality - application of targeted controls rather than blanket regulation This approach ensures that development outcomes reflect the actual capacity of the land.	Complies The SAP framework provides a planning response that appropriately recognises and responds to land capability constraints across the SAP areas.

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Objective	Relevance & Test	Response / Assessment	Evidence	Compliance Pathway	Conclusion
		controls are proportionate to the identified constraints. This supports more consistent and defensible consideration of land capability across the SAP areas.			

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8. Options, scenarios, and risk

This section examines a range of realistic options for the future of the Bruny Island SAP and the Blackmans Bay Bluff & Bonnet Hill SAP. The purpose is to test each option against planning risk, statutory defensibility, implementation practicality, and community outcomes, and to identify a clear and proportionate pathway forward.

Rather than framing the review as a binary choice between retaining or abandoning the SAPs, this section recognises that refinement, restructuring and alternative mechanisms may deliver more effective and defensible outcomes than either wholesale retention or removal. The options assessed are not theoretical; they reflect pathways available within the existing planning framework and respond directly to the issues identified through consultation, strategic review, and analysis.

Each option has been assessed against a consistent set of risk considerations to ensure that statutory defensibility, planning effectiveness and long-term workability is explicitly tested. Table 7 (Risk and Mitigation Matrix) summarises the key risks associated with each consideration and the mitigation approach applied through this review. For consistency, the option assessment adopts a common risk rating framework comprising High, Moderate and Low risk categories. The option-by-option analysis that follows builds on that framework by examining how those risks arise under each scenario, and the extent to which they are avoided, reduced, or managed.

Accordingly, Sections 8.1 to 8.4 assess four alternative scenarios, moving from complete removal of SAP controls through to refinement, restructuring, and alternative planning mechanisms.

Because the findings differ between the SAP areas, the options are not assessed uniformly. Bruny Island and Bonnet Hill are assessed as locations where a refined SAP remains the preferred planning response. Blackmans Bay Bluff is assessed separately, with options including no SAP, a narrower SAP, or an alternative planning mechanism unless further evidence is provided to justify the current SAP extent and provisions.

Table 7: Risk and Mitigation Matrix – Assessment of SAP Options

Assessment consideration	Key risk if not appropriately addressed	Nature of risk	Mitigation approach applied in this review
Statutory risk	Option may attract further intervention, modification, or rejection by the Tasmanian Planning Commission due to insufficient justification, drafting defects, or inconsistency with the SPPs.	Approval / legal risk	Each option is tested against the statutory role of SAPs, section 32 of the <i>Land Use Planning and Approvals Act 1993</i> , and Direction 78 requirements. Mitigation focuses on clarifying drafting intent, removing duplication, addressing identified defects, and ensuring consistency with the structure and purpose of the Tasmanian Planning Scheme.
Planning effectiveness	Option fails to adequately address the planning issues that gave rise to the SAPs, resulting in unmanaged cumulative impacts, inconsistent outcomes, or reliance on discretionary assessment alone.	Strategic / operational risk	Options are assessed against their capacity to respond to identified local planning risks, including environmental sensitivity, landscape impact, infrastructure constraints, and cumulative development pressure. Mitigation prioritises retention or refinement of controls only where they demonstrably address those risks.
Proportionality	Controls apply too broadly or impose regulatory burden that is not commensurate with demonstrated risk, leading to perceptions of overreach and reduced defensibility.	Policy / fairness risk	Mitigation involves testing spatial targeting, assessment triggers and thresholds to ensure controls are risk-based and locally calibrated. Options that narrow scope, improve spatial logic or refine triggers reduce the risk of disproportionate application.
Implementation and administration	Provisions are difficult to interpret, apply or enforce, resulting in inconsistent decision-making, increased appeal risk and administrative burden.	Implementation / governance risk	Options are reviewed for clarity, internal consistency, and workability. Mitigation focuses on clearer drafting, defined terminology, transparent mapping, and published methodology, reducing reliance on subjective judgement and non-auditable inputs.
Community outcomes and confidence	Continued lack of clarity or perceived unfairness undermines trust in the planning system and the legitimacy of SAP controls, even where statutory requirements are met.	Social licence / reputational risk	Mitigation includes improving transparency, explanation, and communication, distinguishing statutory from non-statutory inputs, and ensuring that SAPs are clearly framed as targeted planning tools rather than blanket restrictions.



8.1 Option 1: No SAP

Description

Under this option, the LPS would rely on the underlying zones and standard SPPs to manage use and development. Against the assessment considerations in Table 7, this option performs differently across the SAP areas.

Assessment

Removing the SAPs would simplify the LPS and respond directly to concerns regarding complexity, duplication and lack of clarity. It would also remove the immediate statutory risks associated with SAP drafting, mapping methodologies and justification.

However, this option does not adequately address the planning issues that originally led to the introduction of the SAPs. It would remove locally tailored mechanisms intended to manage cumulative impacts, landscape sensitivity, vegetation retention, wastewater intensification and development in visually prominent or environmentally constrained locations. Responsibility for these matters would revert to assessment under the underlying zones and SPPs, which were not designed to address them in a comprehensive or place-specific manner.

Bruny Island

For Bruny Island, removal of the SAP would create a high planning effectiveness risk. The assessment has identified that the Island's planning issues arise from the combined effect of dispersed settlement, limited infrastructure capacity, wastewater constraints, environmental sensitivity, landscape exposure and cumulative development pressure. These issues are not adequately managed through standard provisions alone.

Removing the SAP would reduce implementation complexity and remove the immediate drafting and mapping issues associated with the current provisions. However, it would also remove the only place-specific mechanism currently available to manage the cumulative effect of development across multiple settlements and zones.

The principal risks for Bruny Island are:

- loss of place-specific controls in an environmentally and infrastructurally constrained island context
- increased reliance on case-by-case discretionary assessment
- reduced ability to manage cumulative wastewater, vegetation and landscape impacts
- greater potential for inconsistent development outcomes between settlements; and
- renewed pressure for future ad hoc amendments or alternative local controls.

On balance, this option is not preferred for Bruny Island.

Bonnet Hill

For Bonnet Hill, removal of the SAP would create a moderate (to high) planning effectiveness risk. The assessment identifies a reasonable planning basis for additional controls relating to landscape prominence, visual sensitivity, vegetation values, development intensity and the transition between residential land and more environmentally sensitive areas.

Removal would simplify the planning framework, but would leave these matters to be managed through standard zone and code provisions that are not specifically calibrated to the Bonnet Hill context. This would reduce statutory complexity, but would also weaken the ability to manage known landscape and environmental sensitivities in a visually prominent location.



The principal risks for Bonnet Hill are:

- loss of controls directed to visual prominence and landscape sensitivity
- reduced ability to manage vegetation retention and built form outcomes in a highly visible location
- increased reliance on standard Low Density Residential Zone provisions
- potential inconsistency with the strategic intent of managing development outside the UGB; and
- increased likelihood that localised constraints would need to be addressed through future reactive amendments.

On balance, this option is not preferred for Bonnet Hill.

Blackmans Bay Bluff

For Blackmans Bay Bluff, the assessment is different. The removal of the SAP presents a low planning effectiveness risk. The report does not support the SAP in its current extent and form because the evidence does not clearly demonstrate that the mapped SAP area and proposed controls are necessary, proportionate or sufficiently linked to the planning risks identified.

In that context, removal of the SAP may be more defensible than retaining the current provisions without substantial revision. However, removal would also mean that any legitimate landscape, vegetation, built form or development intensity issues would need to be managed through the underlying zones, existing codes, or a future alternative planning response.

The principal risks for Blackmans Bay Bluff are:

- loss of any targeted local control over landscape, vegetation or built form matters that may be justified in parts of the area
- reliance on standard provisions that may not fully address localised visual or character issues
- concern from members of the community who support some form of additional protection; and
- the need for a future narrower SAP or alternative mechanism if further evidence confirms that targeted controls are warranted.

On balance, this option is a viable option for Blackmans Bay Bluff, but only if Council accepts that any remaining localised issues should be addressed through existing provisions, a narrower future SAP, or another planning mechanism.

Overall finding for Option 1

Overall Risk Assessment

- Bruny Island – High Risk
- Bonnet Hill – Moderate Risk
- Blackmans Bay Bluff – Low Risk

Option 1 performs well against implementation simplicity because it removes additional SAP provisions and associated drafting complexity. However, it performs poorly against planning effectiveness for Bruny Island and Bonnet Hill because it would remove the only place-specific mechanism currently available to manage identified cumulative, environmental, infrastructure and landscape risks.

Overall, Option 1 presents a high planning effectiveness risk for Bruny Island, a moderate planning effectiveness risk for Bonnet Hill, and a low planning effectiveness risk for Blackmans Bay Bluff.



For Blackmans Bay Bluff, Option 1 performs more strongly because the current evidence does not support the SAP in its existing extent and form. However, if localised controls are to be retained for Blackmans Bay Bluff, they should be narrowed and supported by clearer evidence rather than retained in their current form.

8.2 Option 2: Narrow SAP Now (Minimal Retention Approach)

Description

This option retains the SAPs but significantly narrows their scope, application and content. Controls would be limited to a small number of clearly defined issues and locations where the need for local variation is strongest and most defensible.

Assessment

This approach directly responds to concerns about overreach and proportionality. By stripping back the SAPs to their essential functions, it reduces statutory and implementation risk while retaining a mechanism to manage genuinely localised planning issues.

However, a minimal retention approach risks becoming reactive rather than strategic. If narrowing is undertaken without a clear spatial and policy framework, the SAPs may remain vulnerable to criticism for lack of coherence or for addressing symptoms rather than causes.

Against the assessment considerations in Table 7, this option performs differently across the SAP areas. It reduces statutory and implementation risk by limiting the scope of SAP controls, but its effectiveness depends on whether the narrowing is supported by a clear spatial logic and a defensible explanation of what risks remain to be managed.

Bruny Island

For Bruny Island, a minimal retention approach would only be appropriate if the retained provisions are clearly linked to the Island's most significant and demonstrable planning risks. These include wastewater intensification, environmental sensitivity, landscape exposure, limited infrastructure capacity and cumulative development pressure across dispersed settlements.

The main risk is that a narrow SAP could become too limited to perform the broader coordinating function required on Bruny Island. If controls are reduced without a clear settlement, infrastructure and environmental framework, the SAP may fail to address the cumulative impacts that justified a place-based response in the first place. The principal risks for Bruny Island are:

- retained controls may be too narrow to manage cumulative wastewater, vegetation and landscape impacts
- narrowing may reduce perceived overreach but leave unresolved gaps in the operation of standard provisions
- controls may become fragmented if not supported by clear spatial mapping or precinct logic
- future amendments may still be required if the narrowed SAP does not adequately address settlement and infrastructure constraints; and
- the planning response may be criticised as reactive rather than strategic.

While this option may reduce immediate statutory and community concern, it carries a moderate risk that the retained provisions would be too limited to address the cumulative environmental, infrastructure and settlement issues that underpin the SAP. The option is therefore not preferred unless supported by a clear spatial framework, mapped triggers and complementary strategic planning.

Bonnet Hill

For Bonnet Hill, a narrowed SAP may be a workable option because the planning issues are more spatially confined and easier to define. The controls could be limited to matters such as landscape prominence, vegetation retention, visual sensitivity, built form and development intensity where those issues are clearly supported by the evidence.



This option would reduce unnecessary regulatory burden while retaining a place-specific tool for matters that are not fully addressed by the standard provisions. It may therefore perform reasonably well against proportionality and implementation practicality, provided the retained controls are clearly mapped and limited to the relevant risks.

The principal risks for Bonnet Hill are:

- narrowing may remove controls that are still needed to manage landscape or visual impacts
- retained provisions may remain vulnerable if the mapping methodology is not transparent
- the reduced SAP may not adequately address the relationship between vegetation, built form and visual prominence
- the basis for retained controls must be clearly explained to avoid perceptions of arbitrary regulation; and
- further amendment may be required if retained controls are not sufficiently precise.

On balance, this option presents a low risk outcome for Bonnet Hill. The planning issues are relatively discrete, the area is capable of being clearly mapped, and a reduced suite of targeted controls could continue to address identified landscape, vegetation and development intensity issues without the complexity of the current SAP framework.

Blackmans Bay Bluff

For Blackmans Bay Bluff, this option may be more appropriate than retaining the SAP in its current form. The report does not support the current SAP extent and drafting because the evidence does not clearly demonstrate that the full mapped area and proposed controls are necessary or proportionate.

A narrowed SAP could allow Council to retain controls for those parts of Blackmans Bay Bluff where there is a clearer relationship between the planning issue and the proposed regulatory response. This may include locations where landscape sensitivity, vegetation retention, built form or development intensity risks are supported by evidence.

The principal risks for Blackmans Bay Bluff are:

- narrowing may still be challenged if the retained area is not supported by clear evidence
- controls may remain vulnerable if they are based on general character or landscape assertions rather than mapped values or identified development risk
- community support for the SAP may not be sufficient to establish statutory justification
- a narrowed SAP may need to be supported by further technical or strategic work; and
- removal or substantial narrowing may create concern for those community members seeking stronger protection.

On balance, this option presents a moderate risk outcome for Blackmans Bay Bluff. It provides a pathway to retain local controls where they can be clearly justified, while reducing the risk associated with retaining the current SAP extent and provisions. Its success, however, depends on the ability to demonstrate a clear relationship between the retained controls, the identified planning issues and the supporting evidence base.

Overall finding for Option 2

Overall Risk Assessment

- Bruny Island – Moderate Risk
- Bonnet Hill – Low Risk
- Blackmans Bay Bluff – Moderate Risk

Option 2 generally performs better than full removal because it retains a mechanism for managing localised planning risks while responding to concerns regarding overreach, complexity and proportionality.



For Bruny Island, minimal retention may be too limited unless supported by a clear spatial framework and future strategic planning. For Bonnet Hill, it may provide a defensible pathway if the retained controls are properly mapped and targeted. For Blackmans Bay Bluff, it is a potentially appropriate option where the current SAP cannot be justified in full but narrower, evidence-based controls may still be warranted.

8.3 Option 3: Refined and Restructured SAP (Preferred Option – Bruny Island and Bonnet Hill)

Description

This option involves retaining the SAPs but refining and restructuring them to improve clarity, proportionality, statutory defensibility and long-term performance. Controls would be targeted, clearly justified, and aligned with identifiable spatial, environmental, infrastructure and landscape characteristics.

Assessment

A refined SAP approach allows the planning scheme to respond to genuine local planning risks while addressing the key criticisms raised through consultation and review. Refinement would include clearer purpose statements, removal of duplication with standard provisions, improved mapping transparency, better alignment with underlying zones, and more explicit thresholds and assessment triggers.

For Bruny Island, this option enables the SAP to operate as a coordinated framework that reflects settlement patterns, infrastructure constraints and environmental sensitivity without relying on poorly calibrated or unexplained controls. For Bonnet Hill, this option supports the continued management of landscape, visual sensitivity, vegetation and development intensity through a clearer and more predictable SAP framework. For Blackmans Bay Bluff, a refined SAP is only supported if the controls are narrowed to matters that are clearly justified by the evidence, or if further evidence is provided to demonstrate why the current extent and form is necessary.

Against the assessment considerations in Table 7, this option performs most strongly for Bruny Island and Bonnet Hill because it retains the benefit of place-specific controls while directly addressing the principal risks identified through the review: statutory defensibility, proportionality, implementation clarity and community confidence.

Bruny Island

For Bruny Island, this option presents a low planning effectiveness risk and provides the most appropriate planning response. The assessment identifies that Bruny Island's planning issues arise from the combined effect of environmental sensitivity, limited infrastructure capacity, wastewater constraints, dispersed settlement, tourism pressure and cumulative development impacts. Removing the SAP would leave those matters to standard provisions that are not well suited to managing them in combination.

A refined and restructured SAP allows the controls to be more clearly linked to the particular risks they are intended to manage. This would improve statutory defensibility by clarifying the relationship between the characteristics of the island and the need for additional local provisions. It would also improve proportionality by ensuring that controls are targeted to mapped values, identified infrastructure limitations and locations where standard provisions are insufficient.

The principal risks for Bruny Island are:

- the SAP will remain vulnerable if controls are not spatially targeted or supported by transparent mapping
- broad controls may continue to be perceived as overreach if the relationship between risk and regulation is not clearly explained
- implementation may remain difficult if definitions, assessment triggers and supporting methodologies are not made clear
- future strategic work may still be required to address broader settlement, infrastructure and growth questions; and



- community confidence may not improve unless the refined provisions are supported by clear explanatory material.

On balance, this option is preferred for Bruny Island because it retains the necessary place-specific planning mechanism while addressing the drafting, mapping and proportionality issues identified through the review.

Bonnet Hill

For Bonnet Hill, this option presents a low planning effectiveness risk and provides the most appropriate planning response. The review identifies a reasonable basis for additional controls due to the area's landscape prominence, visual sensitivity, vegetation values, established low-density character and potential for further development intensity.

Against Table 7, the refined SAP option performs well because it retains controls for matters that are not adequately managed by standard zone provisions, while improving implementation clarity and proportionality. The key requirement is that retained controls must be clearly linked to mapped landscape, vegetation and development intensity risks.

The principal risks for Bonnet Hill are:

- retained controls may remain vulnerable if the mapping methodology is not clear
- visual and landscape controls may be challenged if they are not linked to identifiable public viewpoints or landscape exposure
- vegetation provisions may be difficult to administer if they are not clearly distinguished from standard Natural Assets Code requirements
- development intensity controls may be criticised if their relationship to infrastructure capacity and settlement pattern is not explained; and
- community confidence may remain limited if the purpose of the SAP is not clearly communicated.

On balance, this option is preferred for Bonnet Hill because it maintains targeted local controls while allowing the drafting, mapping and assessment triggers to be refined so they operate more clearly and proportionately.

Blackmans Bay Bluff

For Blackmans Bay Bluff, this option presents a moderate planning effectiveness risk and requires a different conclusion. A refined SAP may be supportable, but only if it is substantially narrowed or supported by further evidence.

Against the assessment considerations in Table 7, this option presents the lowest overall level of planning risk for Bruny Island and Bonnet Hill because it retains place-specific controls while directly addressing the principal issues identified through the review, including statutory defensibility, proportionality, implementation clarity and community confidence.

The principal risks for Blackmans Bay Bluff are:

- the SAP may continue to lack sufficient evidence if retained across its current mapped extent
- controls may remain disproportionate if applied to land where the relevant landscape, vegetation or built form risks are not clearly demonstrated
- community support for additional controls may not be enough to satisfy the statutory justification test
- the SAP may continue to duplicate or overlap with provisions already applying through underlying zones or codes; and
- the report's finding that Blackmans Bay Bluff is not supported in its current form may be undermined if the refinement pathway is not clearly expressed.

On balance, this option is only preferred for Blackmans Bay Bluff if the SAP is narrowed to evidence-based controls or supported by further technical and strategic justification. It should not be read as support for retaining the Blackmans Bay Bluff SAP in its current extent and form.



Overall finding for Option 3

Overall Risk Assessment

- Bruny Island – Low Risk
- Bonnet Hill – Low Risk
- Blackmans Bay Bluff – Moderate Risk

The low risk ratings for Bruny Island and Bonnet Hill reflect the ability of a refined SAP to address identified planning issues while improving proportionality, implementation and statutory defensibility. The moderate risk rating for Blackmans Bay Bluff reflects the continued need for either substantial spatial refinement or additional evidence to support any retained controls.

Option 3 provides the most balanced and defensible pathway for Bruny Island and Bonnet Hill. It retains the benefit of place-specific planning controls while addressing the key risks identified in Table 7, including statutory defensibility, planning effectiveness, proportionality, implementation clarity and community confidence.

For Bruny Island, this option provides a framework for managing cumulative environmental, infrastructure and settlement pressures while improving spatial targeting and workability. For Bonnet Hill, it provides a targeted mechanism for managing landscape, vegetation and development intensity in a visually prominent location. For Blackmans Bay Bluff, the option is only appropriate if refinement involves substantial narrowing or further evidence to justify any retained controls.

Accordingly, Option 3 is the preferred pathway for Bruny Island and Bonnet Hill. For Blackmans Bay Bluff, it is a conditional pathway only.

8.4 Option 4: Alternative Zoning or Strategic Planning Approach

Description

This option would replace or supplement SAP controls with alternative planning mechanisms, such as targeted rezoning, precinct-based zoning, additional overlays, or a future structure plan that informs later amendments to the LPS.

This option does not assume that SAP provisions are the only available planning tool. Rather, it recognises that some matters currently addressed through the SAPs may, over time, be more appropriately managed through zoning, mapped overlays, precinct-based controls or broader strategic planning.

Assessment

Alternative zoning or strategic planning may be appropriate where the issue being managed is not simply a development standard, but a broader question about land use, settlement pattern, environmental capacity or infrastructure constraints.

Potential mechanisms include:

- retaining underlying residential zoning but narrowing SAP controls to specific mapped risks;
- applying more targeted precinct-based provisions where different parts of the SAP area have different characteristics;
- considering whether the Landscape Conservation Zone or Environmental Management Zone is more appropriate for land where the primary planning intent is protection of landscape, environmental or conservation values;
- retaining or applying the Low Density Residential Zone where the established land use and development pattern is residential, but supplementing it with narrower controls where standard provisions are insufficient;
- using future structure planning to determine whether zoning, SAP controls or other mechanisms provide the most appropriate long-term response; and



- applying future LPS amendments once the strategic basis for a different zoning or control framework has been established.

This option is most useful where the current SAP is trying to resolve issues that sit partly outside drafting or assessment standards. It may assist in resolving broader questions about settlement hierarchy, infrastructure capacity, environmental thresholds and long-term growth management. However, zoning and structure planning processes are more resource-intensive and may defer resolution if they are not clearly scoped.

Against the assessment considerations in Table 7, this option performs differently across the SAP areas. It may provide a stronger long-term planning pathway, but it is less effective as an immediate response unless supported by clear interim controls and a defined program for future work.

Bruny Island

For Bruny Island, an alternative zoning or strategic planning approach may be useful in the longer term because the issues extend beyond individual development standards. The island's planning issues include settlement pattern, tourism pressure, limited infrastructure, wastewater capacity, environmental values and cumulative development impacts. These matters are not easily resolved through SAP provisions alone.

A future structure plan could assist Council to identify:

- where growth or consolidation should occur
- where additional controls should apply
- where standard provisions are sufficient
- where infrastructure or wastewater capacity should limit further intensification
- where environmental or landscape constraints warrant stronger protection; and
- whether some existing zoning assumptions should be reviewed.

Potential zoning outcomes for Bruny Island could include retaining the existing residential and rural zoning framework where it reflects existing land use, while considering whether specific areas with stronger environmental, landscape or infrastructure constraints require different zoning or precinct-based controls. For example, areas currently managed through broad SAP controls may ultimately be better dealt with through a combination of retained Low Density Residential zoning, targeted SAP precincts, Environmental Management zoning for conservation land, or other zoning changes supported by future strategic work.

The risk is that this approach would take longer and may not provide an immediate mechanism to manage the planning issues already identified. If the SAP were removed before that work was completed, Bruny Island would rely on standard provisions that the review has found are not sufficient to manage several of the relevant cumulative and place-based risks.

On balance, this option presents a moderate risk outcome for Bruny Island. It may provide a stronger long-term strategic planning framework, but it does not provide an immediate substitute for a functional SAP unless and until more detailed strategic planning, zoning review and infrastructure assessment work is completed.

Bonnet Hill

For Bonnet Hill, alternative zoning may have some merit because the area contains a mix of established residential development, vegetation values, visual prominence and landscape sensitivity. Earlier consideration of Landscape Conservation zoning indicates that zoning has already been part of the planning discussion for this area.

Possible alternative approaches could include:

- retaining Low Density Residential zoning for established residential areas while applying narrower SAP controls to mapped landscape or vegetation risks



- considering Landscape Conservation zoning only where the primary planning intent is clearly landscape or environmental protection rather than residential use
- using precinct-based controls to distinguish between more developed residential land, visually exposed slopes and areas with stronger environmental values; or
- relying on a narrowed SAP supported by clearer mapping and assessment triggers instead of broader rezoning.

The main difficulty is that Bonnet Hill still has an established residential role. A broader zoning change may overcorrect the issue if it does not accurately reflect the existing settlement pattern and development expectations. A refined SAP may therefore remain the more proportionate tool in the short term, because it can sit alongside the residential zoning while managing specific landscape, vegetation and built form risks.

On balance, this option presents a low to moderate risk outcome for Bonnet Hill. While alternative zoning or strategic planning may have merit over the longer term, refinement of the SAP remains the more proportionate and immediately implementable response.

Blackmans Bay Bluff

For Blackmans Bay Bluff, this option is more relevant because the report does not support the current SAP in its existing extent and form. If Council wishes to retain additional controls in this area, the planning response should be more clearly matched to the actual values and risks being managed.

Possible alternative approaches could include:

- removing the SAP and relying on the existing General Residential and Low Density Residential zoning where no additional controls are justified
- retaining a narrower SAP only for locations where landscape, vegetation, built form or development intensity risks are clearly evidenced
- considering whether land with strong environmental or public open space values is better managed through Environmental Management zoning or another more appropriate zoning response
- using precinct-based controls only where distinct landscape or character areas can be clearly defined; or
- undertaking further strategic or technical work before determining whether additional controls are justified.

The key point is that community support for additional protection is not, by itself, enough to justify retaining the SAP in its current form. If Blackmans Bay Bluff is to remain subject to additional controls, those controls need to be spatially targeted and supported by evidence. Alternative zoning or a narrower planning mechanism may therefore be more appropriate than retaining the current SAP boundary and provisions.

On balance, this option presents a low risk outcome for Blackmans Bay Bluff. Alternative zoning, a narrower planning mechanism or removal of the SAP may provide a more defensible response if the current SAP cannot be supported by further evidence.

Overall finding for Option 4

Overall Risk Assessment:

- Bruny Island – Moderate Risk
- Bonnet Hill – Low (to Moderate) Risk
- Blackmans Bay Bluff – Low Risk



Option 4 provides a useful longer-term pathway, particularly where SAP controls are being asked to resolve broader strategic planning questions. It may assist in testing whether particular areas should be managed through zoning, precinct-based controls, narrower SAP provisions or future structure planning.

However, this option is not a complete short-term substitute for SAP refinement. For Bruny Island and Bonnet Hill, a refined SAP remains the more practical immediate response because it retains a place-specific mechanism while improving clarity, proportionality and workability. For Blackmans Bay Bluff, alternative zoning, removal, or a narrower SAP may be appropriate if the current SAP cannot be justified by further evidence. Accordingly, Option 4 should be treated as a complementary pathway rather than the preferred immediate response for all SAP areas.

8.5 Conclusion

Table 8: Overall Risk Assessment

Option	Bruny Island	Bonnet Hill	Blackmans Bay Bluff
Option 1 – No SAP	High Risk	Moderate Risk	Low Risk
Option 2 – Narrow SAP	Moderate Risk	Low Risk	Moderate Risk
Option 3 – Refined SAP	Low Risk	Low Risk	Moderate Risk
Option 4 – Alternative Zoning / Strategic Planning	Moderate Risk	Low-Moderate Risk	Low Risk

The preferred pathway differs between the SAP areas. For Bruny Island and Bonnet Hill, the most defensible response is to retain the SAP framework but refine and restructure the provisions so that controls are clearer, more proportionate and more closely linked to the planning risks identified in the assessment. For Blackmans Bay Bluff, the current SAP is not supported in its present extent and form. The appropriate pathway for that area is either to narrow the SAP to matters and locations that are clearly justified by evidence, or to reconsider whether Blackmans Bay Bluff should remain within KINS7.0.

The removal of SAP controls would simplify the planning framework and remove the immediate drafting, mapping and implementation issues associated with the current provisions. However, it would also re-expose known gaps in the operation of standard zone and code provisions, particularly in relation to cumulative impacts, landscape sensitivity, vegetation management, wastewater intensification and infrastructure constraints. For Bruny Island and Bonnet Hill, that outcome would not provide a durable planning response.

A narrowly retained SAP approach would reduce some concerns about overreach and proportionality. However, if narrowing occurs without a clear spatial framework, transparent mapping and a defensible explanation of why particular controls remain, the SAPs would remain vulnerable to the same criticisms raised through consultation and review. Narrowing alone is therefore unlikely to be sufficient for Bruny Island and Bonnet Hill unless it forms part of a more coherent refinement package. For Blackmans Bay Bluff, a narrowed SAP may be appropriate if the retained provisions are confined to clearly evidenced landscape, vegetation, built form or development intensity risks.

The refined and restructured SAP option performs most strongly for Bruny Island and Bonnet Hill because it retains a place-specific planning mechanism while directly addressing the matters that currently weaken the provisions. It allows the SAPs to be recalibrated through clearer purpose statements, improved spatial targeting, transparent mapping, refined definitions, more explicit assessment triggers and closer alignment with the underlying zones and SPPs.

This pathway also provides the strongest response to the risks identified in Table 7. It improves statutory defensibility by linking controls more clearly to demonstrated planning risks. It improves planning effectiveness by retaining mechanisms to manage cumulative, environmental, landscape and infrastructure issues that are not adequately addressed through standard provisions alone. It improves proportionality by narrowing or refining controls where the current drafting is too broad. It also improves implementation by reducing reliance on subjective judgement and making the provisions easier to administer consistently.



For community outcomes, the refined SAP pathway enables Council to respond to legitimate concerns about clarity, fairness, mapping accuracy and proportionality without abandoning place-based planning altogether. It provides a more transparent basis for explaining why controls are retained in some locations, refined in others, and not supported in their current form for Blackmans Bay Bluff.

Accordingly, the preferred pathway is:

- for Bruny Island, retention of the SAP subject to targeted refinement, improved spatial logic and clearer implementation pathways;
- for Bonnet Hill, retention of the SAP subject to refined mapping, clearer development triggers and better alignment between controls and identified landscape and environmental values; and
- for Blackmans Bay Bluff, either substantial narrowing to evidence-based controls or reconsideration of its inclusion within KINS7.0.

On that basis, the refined and restructured SAP pathway is the preferred option for Bruny Island and Bonnet Hill. For Blackmans Bay Bluff, the preferred pathway is conditional: the SAP should only continue if its extent and provisions are narrowed or supported by further evidence. This approach provides the most balanced and defensible outcome because it retains local controls where justified, removes or narrows controls where the evidence is insufficient, and provides a clearer basis for future strategic planning where broader issues remain unresolved.

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Technical issues and drafting recommendations

Appendix A

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Technical Issues and Drafting Recommendations

This section consolidates the technical issues, planning considerations and potential drafting responses identified through the review of community feedback relating to the proposed Specific Area Plans (SAPs) for Blackmans Bay Bluff & Bonnet Hill and Bruny Island. The purpose of this section is to assist the Planning Authority in considering whether SAP provisions should be retained, amended, narrowed, clarified or, where justified, reconsidered.

The tables do not seek to re-present individual submissions or quantify support or opposition to particular provisions. Rather, they translate recurring themes raised through community feedback into planning issues, planning implications and potential responses within the statutory planning framework.

In doing so, the tables:

- identify issues capable of being addressed through SAP drafting, mapping or assessment pathways;
- distinguish those matters from issues that are more appropriately addressed through strategic planning, governance, consultation, infrastructure planning or operational processes;
- identify whether provisions may warrant retention, amendment, narrowing or reconsideration; and
- assist Council in calibrating SAP controls so that they are proportionate, defensible, targeted and aligned with their intended planning outcomes.

Importantly, the issues identified through community feedback do not generally relate to opposition to environmental protection, character outcomes or strategic planning objectives. Rather, they primarily relate to confidence that the SAPs are appropriately justified, applied at the correct scale and supported by sufficiently clear and transparent planning rationale. The recommended responses therefore focus on improving clarity, proportionality, certainty and transparency whilst retaining the strategic intent of the planning framework.

Table A1. SAP Issues and Drafting Recommendations for Blackmans Bay Bluff & Bonnet Hill and Bruny Island.

Technical Issue	Planning Interpretation	Drafting Recommendation	Recommended SAP Response
Whether the SAP is necessary given the existing combination of zones, overlays and codes applying to the area.	Necessity and proportionality are fundamental statutory considerations. If equivalent outcomes can be achieved through existing planning controls, the SAP may be viewed as duplicative.	Clearly articulate why existing provisions are insufficient and identify the unique planning outcomes requiring SAP intervention.	Reconsider / Narrow
Whether the SAP satisfies the statutory threshold for a Specific Area Plan.	SAPs are intended to be exceptional planning tools where standard provisions are insufficient.	Strengthen planning justification and clearly demonstrate necessity and proportionality.	Reconsider
Environmental and scenic controls are perceived as lacking a sufficiently transparent evidence base.	Controls that materially constrain development should be supported by a clear evidentiary basis.	Better explain the evidence base underpinning environmental, vegetation and landscape controls.	Amend
Ecological restrictions are perceived as extending beyond existing statewide provisions without adequate explanation.	Additional regulation should be clearly justified and proportionate.	Clearly identify why local provisions are necessary in addition to existing controls.	Amend
Vegetation retention	Planning controls should not	Explicitly recognise bushfire	Amend



Technical Issue	Planning Interpretation	Drafting Recommendation	Recommended SAP Response
requirements may conflict with bushfire hazard management objectives.	discourage lawful hazard mitigation.	hazard mitigation and defensible space requirements within relevant provisions.	
Vegetation and landscaping outcomes are perceived as being prioritised over life safety considerations.	Environmental and hazard management outcomes should be integrated.	Clarify that vegetation retention should occur where consistent with bushfire safety and hazard management obligations.	Amend
Uniform controls do not adequately respond to varied lot sizes, configurations and topography.	SAP controls should be responsive to site circumstances.	Strengthen performance pathways and reduce reliance on rigid acceptable solutions.	Narrow
Battle-axe lots, larger holdings and established residential areas are subject to the same standards despite differing site characteristics.	One-size-fits-all regulation may not achieve proportional outcomes.	Introduce greater flexibility for non-standard sites and development contexts.	Narrow
Bird collision controls are considered broad, difficult to understand and potentially disproportionate.	Biodiversity controls should be targeted and practical.	Clarify intent, risk scenarios and compliance pathways.	Amend
Bird collision provisions may apply where risk is negligible.	Controls should reflect identified risk rather than blanket application.	Limit application to mapped sensitivity areas or demonstrated risk situations.	Narrow
Coastal proximity provisions are difficult to interpret.	Ambiguous drafting reduces certainty and confidence.	Refine coastal proximity provisions and improve explanatory guidance.	Amend
Apparent height provisions are difficult to understand and apply.	Assessment outcomes should be predictable and transparent.	Clarify how apparent height is determined and assessed.	Amend
Height controls may not always align with actual visual impact.	Visual outcomes should drive assessment rather than simplified proxies.	Better align provisions with visual sensitivity and landscape outcomes.	Amend
Wastewater provisions are perceived as overly rigid on constrained sites.	Environmental protection should be balanced with practical implementation.	Introduce stronger performance pathways and reduce reliance on absolute restrictions.	Amend
Existing lawful wastewater systems may not be capable of being upgraded or replaced.	Legacy development should not be unnecessarily disadvantaged.	Create a specific upgrade and replacement pathway for existing systems.	Amend
Constrained sites may face limited compliance options.	Planning provisions should allow practical solutions where outcomes can be achieved.	Clarify assessment pathways and the role of suitably qualified technical advice.	Amend
Excessive reliance on	Excessive discretion may undermine consistency and	Tighten drafting, definitions	Amend

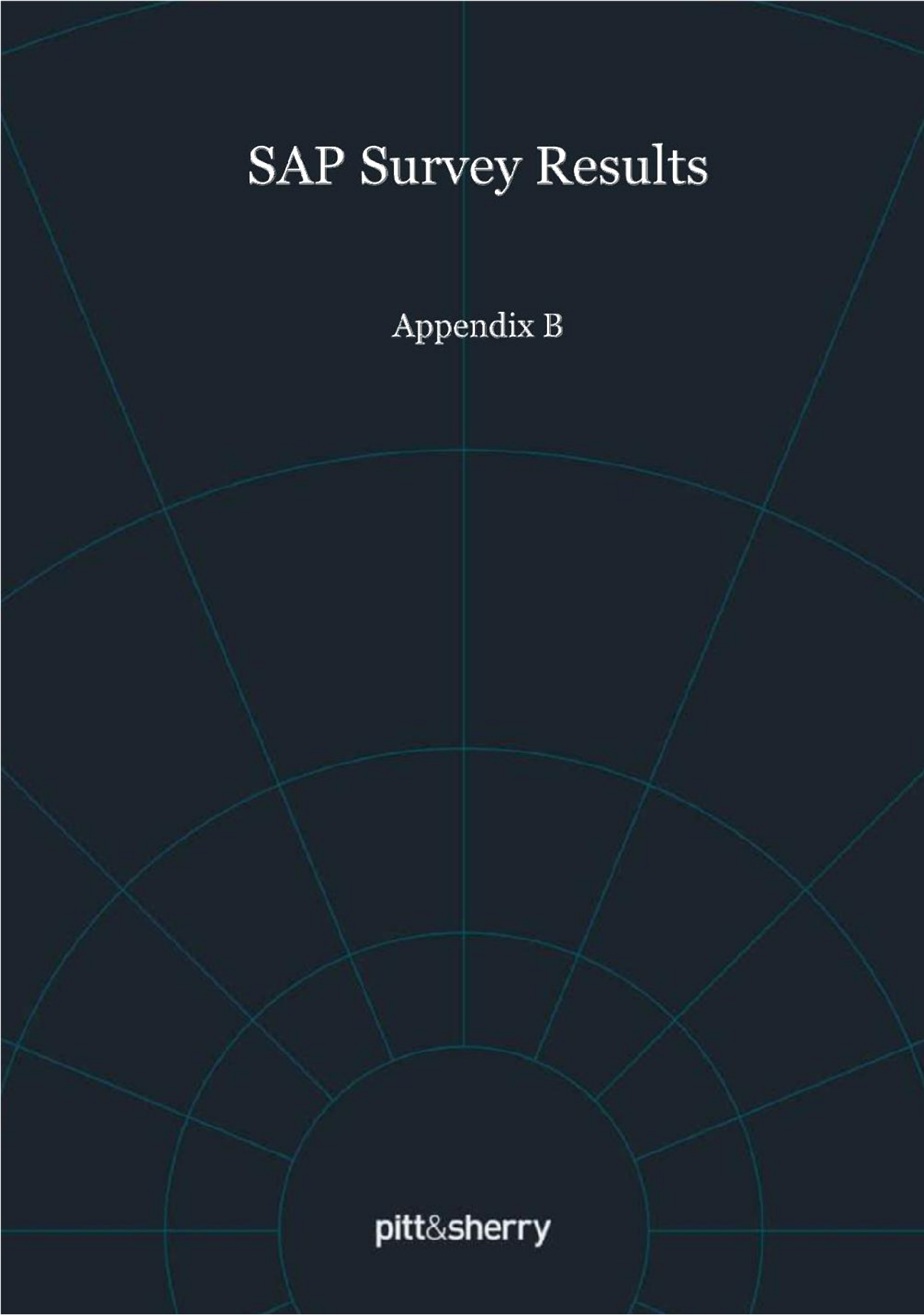


Technical Issue	Planning Interpretation	Drafting Recommendation	Recommended SAP Response
discretionary assessment. Lack of clear local area objectives.	predictability. Objectives assist interpretation and administration of discretionary provisions.	and assessment triggers. Introduce or strengthen local area objectives.	Amend
SAP boundaries are not clearly understood or justified.	Boundary definition must be transparent and defensible.	Clearly explain boundary rationale and review anomalies where required.	Amend
<i>Bruny Island SAP Specific</i>			
Application of a single SAP across Bruny Island does not adequately reflect local variation.	The broader the SAP, the stronger the justification required.	Consider precinct-based or locality-based application.	Narrow
Island-wide application is perceived as disproportionate.	Scale of application must align with planning need.	Better justify scope or narrow SAP application.	Narrow
The Bruny Island SAP is perceived as vague and highly discretionary.	Certainty is a fundamental planning principle.	Strengthen drafting precision and reduce subjectivity.	Amend
Natural values definitions are overly broad.	Broad definitions can create regulatory uncertainty.	Refine definitions and clarify application.	Amend
Natural values may effectively expand during development assessment.	Statutory controls should be predictable and spatially understood.	Clarify relationship between mapped values and site-specific assessment.	Amend
Assessment triggers for specialist reports are unclear.	Unclear triggers create cost and uncertainty.	Introduce clearer assessment thresholds and information requirements.	Amend
The concept of low-key tourism lacks clarity.	Strategic objectives should translate into measurable planning outcomes.	Clarify tourism scale, intensity and assessment expectations.	Amend
Tourism growth is perceived as disconnected from infrastructure constraints.	Land use outcomes should acknowledge servicing limitations.	Better integrate infrastructure capacity into assessment pathways.	Amend
Existing Bruny Island wastewater systems may be difficult to upgrade.	Legacy settlement patterns warrant consideration.	Create explicit pathways for upgrading existing lawful systems.	Amend
Agricultural viability concerns are compounded by SAP controls.	SAPs should not unnecessarily duplicate zoning restrictions.	Clarify distinction between zoning intent and SAP provisions.	Amend
Regulatory burden may exceed planning benefit.	Additional regulation should deliver measurable outcomes.	Review provisions and remove controls that do not provide clear planning benefit.	Reconsider
Controls are applied more broadly than the specific risk or sensitivity being managed.	Targeted regulation improves proportionality and legitimacy.	Restrict application to identified risks, sensitivities or mapped areas.	Narrow



Table A2. General Issues and Alternative Response Pathways

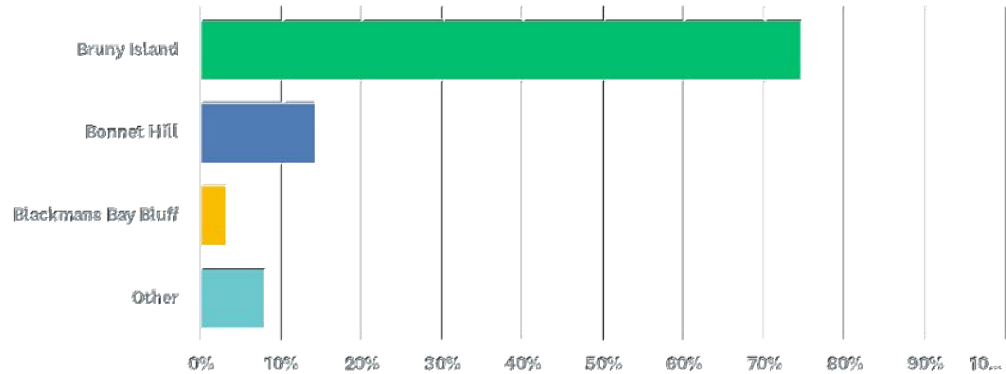
General Issue	Planning / Governance Consideration	Response Pathway
Confidence in planning outcomes and the SAP process.	The dominant issue raised through feedback relates to confidence in the appropriateness and justification of the SAPs.	Structure planning and targeted engagement process.
Consultation timing and perceived influence.	Consultation concerns cannot be resolved through SAP drafting.	Separate consultation and engagement response.
Lack of strategic context explaining the purpose of SAP controls.	SAPs are implementation tools rather than strategic planning frameworks.	Structure plan or equivalent place-based framework.
Need for a clearer explanation of planning trade-offs.	Strategic issues extend beyond statutory drafting.	Structure planning and strategic engagement.
Complexity and readability of planning documentation.	Accessibility is an administrative rather than statutory issue.	Plain-English guides and explanatory material.
Difficulty understanding planning controls and mapping.	Community understanding affects confidence and participation.	Interactive mapping and visual communication tools.
Perceived inconsistency and fairness between locations.	Issue relates to consistency of planning rationale rather than consistency of outcome.	Better explanation of SAP rationale and planning framework.
SAPs perceived as being used inconsistently.	SAPs should operate as exceptional planning instruments.	Development of SAP thresholds and triggers framework.
Compensation and property value concerns.	These matters sit outside the planning scheme framework.	Explanation of statutory limitations and legislative context.
Infrastructure and service delivery concerns.	Outside the scope of SAP drafting.	Operational and infrastructure planning processes.
Compliance, enforcement and operational issues.	These matters are not SAP issues.	Referral to appropriate Council functions.
Broader governance and transparency concerns.	Confidence may benefit from ongoing engagement mechanisms.	Advisory groups, governance mechanisms or targeted consultation.
Broader legislative and policy concerns beyond Council control.	Some issues extend beyond local planning instruments.	Advocacy to the State Planning Office where appropriate.



Community Feedback Survey: Specific Area Plans (SAPs)

Q1 Where is your property / business or where do you live?

Answered: 126 Skipped: 0

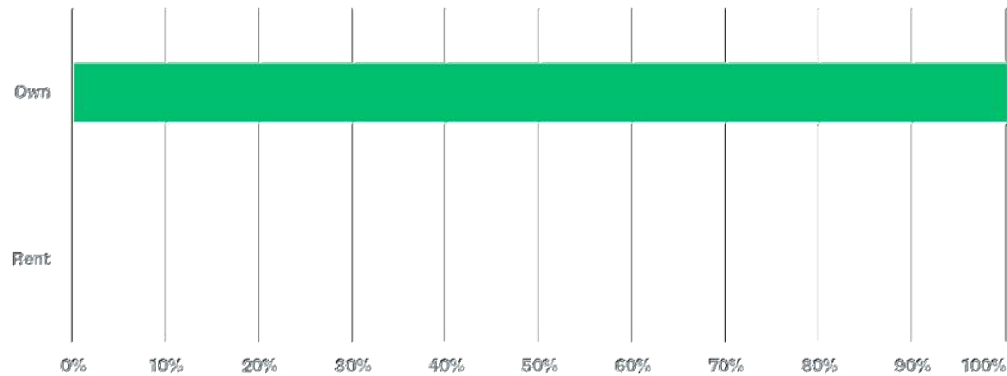


Answer Choices	Percentage	Responses
Bruny Island	74.60%	94
Bonnet Hill	14.29%	18
Blackmans Bay Bluff	3.17%	4
Other	7.94%	10
Total		126

Community Feedback Survey: Specific Area Plans (SAPs)

Q2 Do you own or rent your property?

Answered: 126 Skipped: 0



Answer Choices	Percentage	Responses
Own	100.00%	126
Rent	0%	0
Show comments		
Total		126

Community Feedback Survey: Specific Area Plans (SAPs)

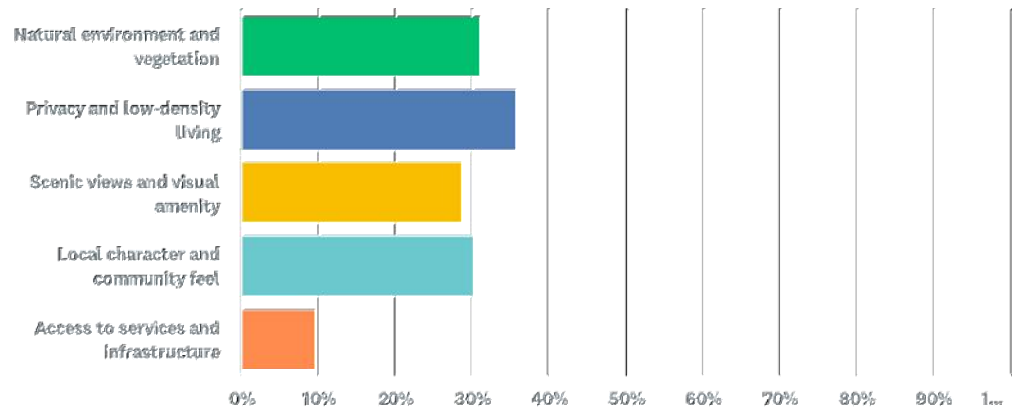
#	OTHER (PLEASE SPECIFY)	DATE
1	approximatley 30 Bruny Island properties, around 4500 acres.	3/4/2026 3:07 PM
2	Burwood SAP	2/27/2026 8:58 PM
3	Burwood SAP	2/27/2026 8:43 PM
4	I own 2 properties	2/20/2026 11:17 AM

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Community Feedback Survey: Specific Area Plans (SAPs)

Q3 What do you value most about the area where you live or where your property is? (please select one)

Answered: 126 Skipped: 0



Answer Choices	Percentage	Responses
Natural environment and vegetation	30.95%	39
Privacy and low-density living	35.71%	45
Scenic views and visual amenity	28.57%	36
Local character and community feel	30.16%	38
Access to services and infrastructure	9.52%	12
Show comments		
Total		170

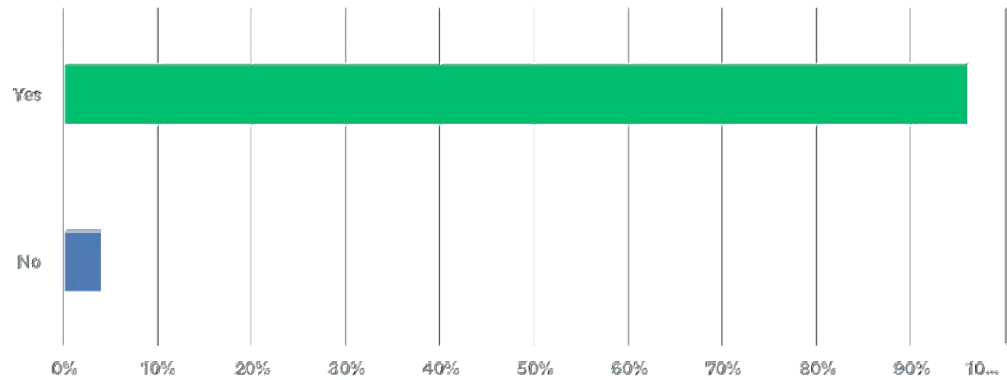
Community Feedback Survey: Specific Area Plans (SAPs)

#	OTHER (PLEASE SPECIFY)	DATE
1	Ability to use as a rural property	3/5/2026 2:27 PM
2	What about a question of what concerns people about living in the aea. Ie bushfires, wind, lack of roadside maintenance, roadkill,	3/5/2026 10:56 AM
3	I want to protect our scenic views out to the beach and Bruny. I don't value the view from Kingston Beach back to Bonnet Hill and do not believe that the SAP should limit our ability to develop our home or maintain our garden to maintain a vista for people that live in Kingston Beach and have not paid to own a property here like we have.	3/4/2026 8:40 PM
4	The ability to build a house on any single title	3/4/2026 3:07 PM
5	freedom to choose how I use my land within regulations	3/4/2026 12:03 PM
6	Its a combination of most of these, but not any single one in particular. I can see why you'd like to point to these answers as a reason why the SAP is important, but, none of these reasons should inhibit a landowners ability to construct a house and build a life here.	3/3/2026 3:18 PM
7	Climate adaptation and mitigation responsiveness; Independent island planning framework	3/2/2026 10:25 PM
8	Council Rates that do not rise above CPI	3/2/2026 6:11 PM
9	By Privacy, I mean not being over governed, interfered with and having reasonable landowner rights taken away by taken away by council	3/1/2026 4:41 PM
10	Location	2/28/2026 7:12 PM
11	Low Density Living, Scenic Views and Visual amenity, Local Character and Community Feel	2/28/2026 1:43 PM
12	Nil - the proposed SAP for bonnet hill is the same as that proposed for Burwood drive. It doubles up controls, will lead to complex, costly and lengthy planning approvals, all at the expense of rate payers. Kingboroughs continues push of these SAPs is dissapointing and lacks community consideration. A council simply running its own agenda rather than looking after the people they represent.	2/27/2026 8:58 PM
13	That people are able to use there properties without overly restrictive and expensive planning process and overlap	2/27/2026 8:43 PM
14	For land holders to have certainty around there ability to use and develop there land without years of delays due to planing difficultys.	2/26/2026 9:35 AM
15	Infrastructure and resources do not match the annual influx of visitor numbers on local Infrastructure	2/23/2026 3:11 PM
16	My own space, privacy and my own choice to do what I want with my property	2/23/2026 1:10 PM
17	Why only one? We also value privacy and local characteristics as well as natural values	2/21/2026 9:29 AM
18	Being able to pass on family values, being able to have a legacy for my family	2/20/2026 10:26 PM
19	Privacy and ability to manage the land how it best impacts my family's needs	2/20/2026 6:34 PM
20	Also value that it has always been a place for holidays, with people owning modest shacks	2/20/2026 3:44 PM
21	if I could have picked more than one, I would have picked the first four	2/20/2026 1:30 PM
22	Relaxed vibe, access to beach and waterways, holiday makers interaction	2/20/2026 12:53 PM
23	Bruny is lacking in all services	2/20/2026 11:17 AM

Community Feedback Survey: Specific Area Plans (SAPs)

Q4 Have you read the proposed Specific Area Plan for your area?

Answered: 126 Skipped: 0

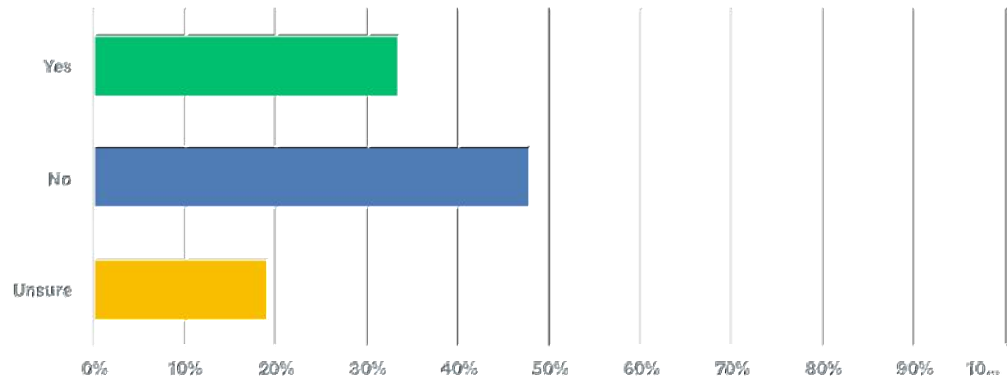


Answer Choices	Percentage	Responses
Yes	96.03%	121
No	3.97%	5
Total		126

Community Feedback Survey: Specific Area Plans (SAPs)

Q5 Overall, do you support having a Specific Area Plan for your area?

Answered: 126 Skipped: 0



Answer Choices	Percentage	Responses
Yes	33.33%	42
No	47.62%	60
Unsure	19.05%	24
Total		126

Community Feedback Survey: Specific Area Plans (SAPs)

Q6 How well do you think the proposed SAP reflects what is important for your area?

Answered: 126 Skipped: 0

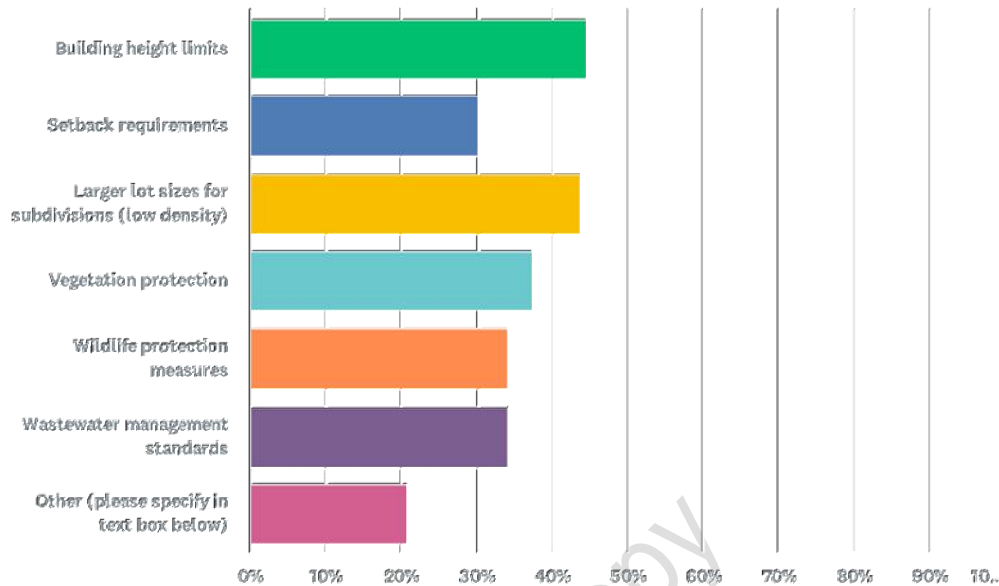


Rating	Percentage	Responses
Not at all	21.4%	27
Poorly	34.1%	43
Neutral	23.8%	30
Well	15.9%	20
Very well	4.8%	6
Average 2.5		126

Community Feedback Survey: Specific Area Plans (SAPs)

Q7 Which parts of the proposed plan do you like? (select all that apply)

Answered: 126 Skipped: 0



Answer Choices	Percentage	Responses
● Building height limits	44.44%	56
● Setback requirements	30.16%	38
● Larger lot sizes for subdivisions (low density)	43.65%	55
● Vegetation protection	37.30%	47
● Wildlife protection measures	34.13%	43
● Wastewater management standards	34.13%	43
● Other (please specify in text box below)	20.63%	26
Show comments		
Total		308

Community Feedback Survey: Specific Area Plans (SAPs)

#	OTHER (PLEASE SPECIFY)	DATE
1	I find the SAP overly complicated and difficult to understand	3/5/2026 8:49 PM
2	It adds another layer of complexity and cost to any already extremely costly approval process	3/5/2026 2:27 PM
3	None it is an extreme bureaucratic strangulation of property rights . It overrides the normal rights under zoning	3/5/2026 11:05 AM
4	I think all above is important but the SAP is too broad and restrictive. Bonnet Hill has a diverse collective of developments from urban style communities to broad acre type development.	3/5/2026 10:56 AM
5	Provision of artesian food and drink premises in various zones	3/4/2026 5:52 PM
6	NO elements of the plan are supported	3/4/2026 1:40 PM
7	nothing the SAP is highly inappropriate and treats bruny different from other council areas which also have high bio diversity. The SAP just adds extra cost to residents/owners and allows council staff to make their own interpretations and only approve what they like and delay approvals. Everything becomes vague and opens decisions up to the Planners personal opinion. Its not rules based just individuals ideas thoughts and prejudices.	3/4/2026 11:16 AM
8	I believe the SAP overlaps with existing codes and will just create unnecessary costs and paperwork when attempting to build on Bruny island	3/3/2026 3:10 PM
9	None of the above	3/3/2026 1:25 PM
10	None of the above	3/3/2026 12:24 PM
11	We like the parts that are not yet spelled out yet, and constitute a great potential: accommodating, expressing, nurturing and protecting the island's special and unique cultural and natural values, controlling and discouraging mass tourism, and destructive commercial use of land and sea - for the latter, notably industrial salmon farming.	3/2/2026 10:25 PM
12	None of it. The restrictions in the SAP are already embedded in the zoning. The SAP is utterly unnecessary.	3/2/2026 11:51 AM
13	None	3/1/2026 4:45 PM
14	There are very few (if any) redeeming features of the proposed Bonnet Hill SAP.	3/1/2026 4:41 PM
15	Specific areas for protection of significant species.	2/28/2026 6:46 PM
16	LDR Performance Criteria particularly in respect of streetscape character preservation or compatibility.	2/28/2026 1:43 PM
17	None - The controls simply double legislative and planning requirements. Property owners should be afforded natural justice to receive the same planning requirements as all other kingborough residents. Just for living in an area that hasn't been developed as far as some others doesn't mean they should be penalised of the freedoms to use their land as the zoning requirements defined by the Tasmanian planning commission should be affording them.	2/27/2026 8:58 PM
18	The standard planning conditions are more than adequate for the area. The SAP simply provides over governance	2/27/2026 8:43 PM
19	Unnecessary and expensive bureaucracy that overrides the normal planning zones	2/27/2026 4:13 PM
20	Would prefer no change to zoning	2/27/2026 10:45 AM
21	Some vegetation protection	2/26/2026 4:38 PM
22	none of the above	2/25/2026 5:10 PM
23	I don't.	2/24/2026 7:30 PM
24	To restrictive don't need double up on what happened all ready been applied or is to be applied	2/23/2026 8:54 PM
25	Q6 doesn't work, can't select one star	2/21/2026 9:29 AM
26	None I think it's fine the way it is and any changes do nothing but hamper the owners of property here	2/21/2026 8:52 AM

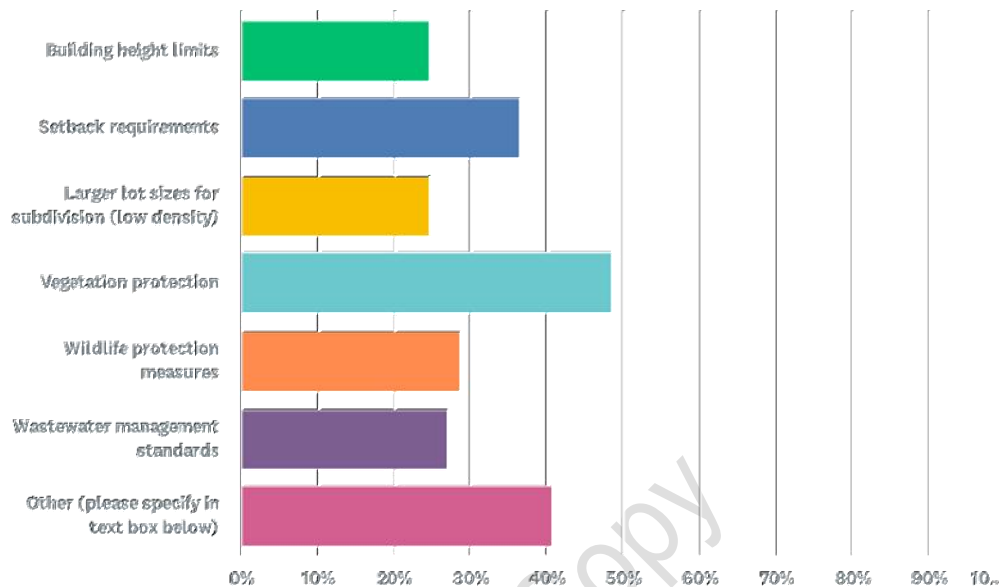
Community Feedback Survey: Specific Area Plans (SAPs)

27	None	2/20/2026 6:34 PM
28	None of it	2/20/2026 3:58 PM
29	It needs allowing more houses in key areas, to reflect the changes to the place with the influx of tourists and jobs associated with it, but also the fact that many old shacks are now inhabited by people that live there all year round	2/20/2026 3:44 PM
30	It is very difficult to understand how the SAP relates to current planning rules, which I think SAP is in addition to	2/20/2026 1:30 PM
31	There is nothing to like as land owners were not consulted	2/20/2026 12:55 PM
32	I do not support a SAP	2/20/2026 12:18 PM
33	None until there is community consultation. Residents have not had due consultations in relation to all these proposed plans & especially the financial impact. It feels like a money grab & dictatorial from a council that is there to 'represent its community'.	2/17/2026 1:47 PM

Community Feedback Survey: Specific Area Plans (SAPs)

Q8 Which parts of the proposed plan do you not like? (select all that apply)

Answered: 126 Skipped: 0



Answer Choices	Percentage	Responses
● Building height limits	24.60%	31
● Setback requirements	36.51%	46
● Larger lot sizes for subdivision (low density)	24.60%	31
● Vegetation protection	48.41%	61
● Wildlife protection measures	28.57%	36
● Wastewater management standards	26.98%	34
● Other (please specify in text box below)	40.48%	51
Show comments		
Total		290

Community Feedback Survey: Specific Area Plans (SAPs)

#	OTHER (PLEASE SPECIFY)	DATE
1	I find this overly complicated and difficult to understand what is proposed to protect wildlife and vegetation	3/5/2026 8:49 PM
2	None, it is not needed and never has been. No professional planner approves this new bureaucratic burden on owners	3/5/2026 2:27 PM
3	N/a	3/5/2026 11:15 AM
4	None. If Council wants to restrict owners right then it needs to pay compensation	3/5/2026 11:05 AM
5	See qtr.8. Also wastewater treatment specs very rigid. ie min. 1.5m soil depth too restrictive. I wouldn't think many areas would have soil depth of 1.5m I would think there is a general standard to deal with wastewater	3/5/2026 10:56 AM
6	nil	3/5/2026 9:21 AM
7	I do not believe that animals and trees should be prioritised over people. The SAP does nothing to improve Fire Management and risk reduction. In the event of a major fire like we had in 1996? There will be no habitat, no animals and no vista from Kingston Beach.	3/4/2026 8:40 PM
8	Restricting building bulk and mass to centre of site+ restrictive for larger sites + Bushfire risk if can't clear vegetation as needed. Most residents in Bonnet Hill overall want to retain the natural vegetation and tree scape, which is why we live here, but still want to be bushfire safe.	3/4/2026 8:14 PM
9	I don't understand how it connects with the TPS eg Tourism Zone can build to 10m height even though it's a coastal property. Which scheme takes priority? I fear it will all be at the discretion of Council staff. It will make an already difficult process even more difficult.	3/4/2026 5:52 PM
10	All elements	3/4/2026 1:40 PM
11	Restrictions on what was previously zoned Rural land prior to it being zoned Environmental Living and now proposed as Landscape Conservation	3/4/2026 12:03 PM
12	where non potable water is not available owners will now have to demonstrate to Council that their water arrangements are suitable. Another impost with probably a "Tank expert" at a cost again and more delay.	3/4/2026 11:16 AM
13	Landscape conservation zoning	3/4/2026 10:23 AM
14	glazing requirements for collision are very onerous.	3/3/2026 10:53 PM
15	Don't like the zoning change to apply all including ones that's already been bought as residential property, not rural.	3/3/2026 6:36 PM
16	The SAP essentially inhibits the capacity for use as defined by the underlying zone "low density residential" Yes our zone has remained low density residential but this overlay means we can't treat our land as such.	3/3/2026 3:18 PM
17	Not sure that building height not more than 5 m in coastal proximity is appropriate when considering slope of coastal lots. There is no mention of feral fauna (or flora). Deer and cats need ongoing management to eradicate. The SAP should support this ongoing management of feral species.	3/3/2026 3:16 PM
18	As above	3/3/2026 3:10 PM
19	There is no constraints on the shocking aquaculture abuse of Bruny's marine environs. The agricultural potential is vastly overstated. The 'low-key' tourism designation is inappropriate and vague: it is at best a 'high-value, low-impact eco-tourism' setting.	3/2/2026 10:25 PM
20	All parts are poorly worded/executed	3/2/2026 9:51 PM
21	It provides added burden, and I fail to see how the normal zoning and codes can't cover the purported issues.	3/2/2026 4:12 PM
22	Nothing	3/2/2026 1:11 PM
23	None of it. The SAP is pointless and imposes restrictions that have been removed by the re-zoning.	3/2/2026 11:51 AM
24	Standards on existing "shacks" are not addressed.	3/2/2026 8:41 AM
25	The SAP is too complex and is not needed on top of the other zones and overlays that apply	3/1/2026 4:45 PM

Community Feedback Survey: Specific Area Plans (SAPs)

26	N/A	2/28/2026 7:04 PM
27	Application of restrictions placed on smaller lot sizes in the township being given the same regulations as larger lot sizes. Restrictions on building a second building on larger lots within the rural living zone. I don't agree with the restrictions placed on the landscape conservation zone - particularly where the property has been under continued ownership for many years prior.	2/28/2026 6:46 PM
28	Bonnet Hill & Blackmans Bay Bluff are completely different areas. Separate SAP's are needed. Multiple Dwellings should not be permitted in Low Density Areas. KIN-S7.7.5A1(b) - Blackmans Bay Bluff is a fully developed residential area so this clause is impractical and unnecessary.	2/28/2026 1:43 PM
29	Zoning restrictions on building a house on currently vacant Landscape Conservation lots.	2/28/2026 9:06 AM
30	As above, councils approach defies natural justice for landowners with-in these SAPs. Council should drop the SAPs so the move to the new scheme can occur. Post rollover undertake proper consultation and apply for them if still relevant later.	2/27/2026 8:58 PM
31	Assumptions made that commerce and tourism will inevitably continue to grow.	2/27/2026 4:58 PM
32	Expensive, restrictive and totally unnecessary	2/27/2026 4:13 PM
33	Inappropriate coastal proximity application	2/26/2026 4:38 PM
34	Don't want it looking like a suburb with footpaths ect	2/26/2026 12:03 PM
35	None of them	2/25/2026 5:10 PM
36	Unsure until something was planned for the land	2/25/2026 2:05 PM
37	By requiring an answer, this question assumes the respondent doesn't like something about the proposed plan. This is poor question design.	2/25/2026 7:11 AM
38	restriction to grazing in rural living	2/24/2026 9:18 PM
39	I don't know	2/24/2026 9:05 PM
40	Subdivision block sizes too large and hence restrictive, I think subdivision should be encouraged if infill in existing settlements with block sizes being in character to the area, not a minimum size throughout, as long as it meets required setbacks.	2/24/2026 8:04 PM
41	Most of the SAP covers existing properties and not large areas of land which are more likely to be subdivided. The land to the north of Harpers Road should be included.	2/24/2026 5:47 PM
42	Subdivision lots still too small.	2/24/2026 10:17 AM
43	None	2/23/2026 6:22 PM
44	No Region based community Fire Management planning	2/23/2026 3:11 PM
45	There is not part that I dislike	2/23/2026 8:55 AM
46	The vegetation/wildlife protection should be termed vegetation/wildlife management. The property owner will have the protection of vegetation and wildlife in mind within management of their own property. Building heights and setbacks are covered adequately by KC/Tas planning schemes and don't need an SAP.	2/22/2026 7:45 PM
47	The SAP is a sneaky way to reimpose the restrictive zoning rules that the rezoning removes. There should not be a SAP. If the zoning is appropriate, no SAP is necessary.	2/21/2026 11:01 AM
48	None	2/21/2026 9:35 AM
49	Can affect a landowner's efforts to reduce fire risk	2/21/2026 9:29 AM
50	The changing of zoning which means the reduction in property value. This is outrageous	2/21/2026 8:52 AM
51	All - overreaching into land owners private life	2/20/2026 6:34 PM
52	The island is poorly managed by Parks and Wildlife, they allow dogs on the beaches. This is totally ridiculous way to protect wildlife. Dog owners have a free reign to the island and nobody cares	2/20/2026 3:44 PM
53	It is too difficult to understand how the SAP relates to current planning rules	2/20/2026 1:30 PM
54	To much mention of "Discretionary" council head planner when asked about whose discretion, would not answer as to how the process would work if a landowner did not agree	2/20/2026 12:55 PM

Community Feedback Survey: Specific Area Plans (SAPs)

with the discretion.

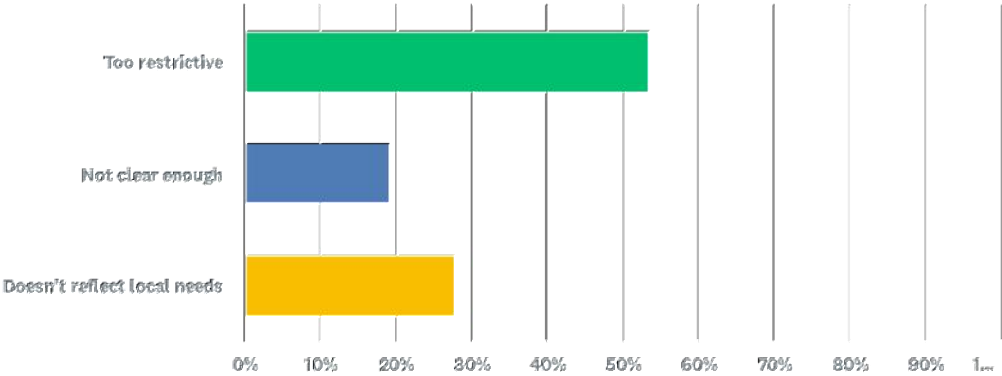
55	I do not support a SAP. Zoning and Overlays are sufficient.	2/20/2026 12:18 PM
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Community Feedback Survey: Specific Area Plans (SAPs)

Q9 Why do you not like these parts?

Answered: 105 Skipped: 21



Answer Choices	Percentage	Responses
Too restrictive	53.33%	56
Not clear enough	19.05%	20
Doesn't reflect local needs	27.62%	29
Show comments		
Total		105

Community Feedback Survey: Specific Area Plans (SAPs)

#	OTHER (PLEASE SPECIFY)	DATE
1	It overrides all the zoning planning permissions	3/5/2026 2:27 PM
2	Owners should not bear the burden of left leaning community groups	3/5/2026 11:05 AM
3	I wanted to select 'Too restrictive' too but survey won't allow me to.	3/4/2026 5:52 PM
4	2500m2 is a bit restrictive. When a house could be designed to a scale and profile suitable for the plot size and blend into the landscape, maybe even enhancing it.the plot size	3/4/2026 4:43 PM
5	Plan lacks equity, too restrictive, doesn't contribute to a sense of community community	3/4/2026 1:40 PM
6	Prioritises a subjective concept of "landscape value" over real measurable environmental values. While we suffer the impact of thousands of tourists, this proposed zoning effectively excludes us from using our land for any future development.	3/4/2026 12:03 PM
7	Just makes everything discretionary so some Planner can put their own views and opinions. Not rules based. Not even examples given.	3/4/2026 11:16 AM
8	focus is on the visual aspect of the landscape, environment protection is secondary, landscape values are too subjective and changeable, doesn't allow for climate warming etc	3/4/2026 10:23 AM
9	Rural Zone - clause 20.2 Where will an abattoir be permitted as it would be appropriate for both wallabies and deer. KIN-S6.6 Who decides whether a Discretionary Use "complements the unique and diverse character..."	3/3/2026 3:16 PM
10	All of the above	3/3/2026 3:10 PM
11	All of the above	3/3/2026 1:25 PM
12	All of above.	3/3/2026 12:24 PM
13	Too permissive, not defined.	3/2/2026 10:25 PM
14	The blanket application over the whole Island does not take into account the specific needs, local ecological communities etc.	3/2/2026 9:51 PM
15	Should not be different from any other areas of Kingborough with same zoning	3/2/2026 8:27 PM
16	It seems that All activities on my block are permitted unless explicitly permitted. There is no indication of what is permitted without the need to pay money to council for permission. The current arrangements more or less remove property rights; and the SAP is only going to make matters worse.	3/2/2026 11:51 AM
17	All of the above	3/1/2026 4:45 PM
18	All of the above. The limits and controls already applied in the standard clauses of LUPA and Low Density Residential zone are more than adequate for Bonnet Hill. There is no reasonable justification (including scientific evidence) provided by Council to support the additional restrictions introduced by the SAP. As a 'risk management' strategy, it does not explain what the risk is (very low, given that 95+% of the blocks in BH are already developed) and is not a proportionate response.	3/1/2026 4:41 PM
19	Most of available land for development is allocated	2/28/2026 7:12 PM
20	Would prefer to see a bit more more flexibility.	2/28/2026 6:46 PM
21	All of the above	2/28/2026 3:45 PM
22	The SAP must not be prescriptive and should rely on the LDR Performance Criteria.	2/28/2026 1:43 PM
23	All of the above. Councils agenda rather than the property owners, Defies natural justice.	2/27/2026 8:58 PM
24	New rules for larger sites should not apply to historically smaller lots already developed. Criteria for new larger lots will render existing lots totally non compliant thus making modifications much more difficult and time consuming.	2/26/2026 4:38 PM
25	No mention at all about Tourist provides views	2/25/2026 5:10 PM
26	I don't know	2/24/2026 9:05 PM
27	Residential / rural residential housing should be encouraged in existing settlements, with block sizes being in character with each individual settlement. We need housing that isn't airbnb. Feb 2026 saw the announcement of a Child Care centre to be open, we need housing to accommodate families.	2/24/2026 8:04 PM

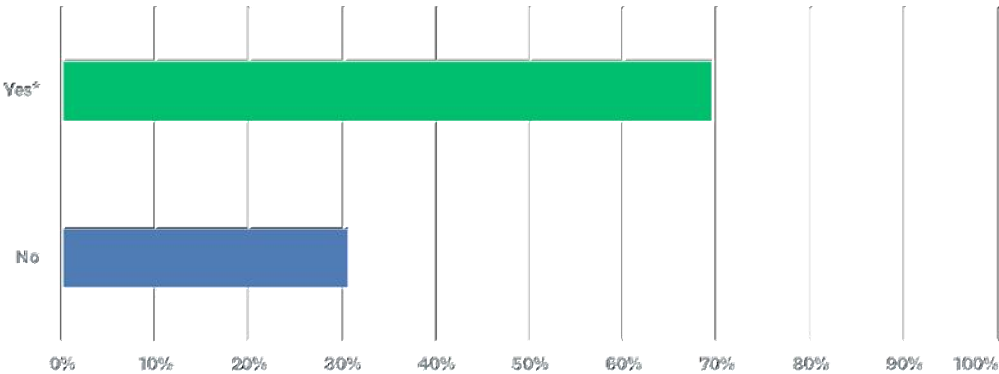
Community Feedback Survey: Specific Area Plans (SAPs)

28	Too restrictive and doesn't reflect local needs also was no very clear very confusing as doubled up in most things	2/23/2026 8:54 PM
29	The whole plan is all too vague and will create a scenario in which planning decisions will rely too heavily on the opinions of council planners	2/23/2026 1:10 PM
30	Too onerous	2/23/2026 10:12 AM
31	Not applicable	2/23/2026 8:55 AM
32	The vegetation/wildlife protection should be termed vegetation/wildlife management. The property owner will have the protection of vegetation and wildlife in mind within management of their own property. Building heights and setbacks are covered adequately by KC/Tas planning schemes and don't need an SAP.	2/22/2026 7:45 PM
33	Too restrictive and it does not reflect local needs.	2/21/2026 11:01 AM
34	No thought had gone into the flow on effect to local owners.	2/21/2026 8:52 AM
35	All	2/20/2026 6:34 PM
36	Parks and Wildlife don't take care of their responsibilities regarding dogs putting in danger wildlife. Huonville Council seems to care little for this and between the two it is a disgrace to see the island running amok with dogs	2/20/2026 3:44 PM
37	SAP seems to be in addition to current planning rules. This makes it difficult to understand the overall planning rules that apply.	2/20/2026 1:30 PM
38	And doesn't reflect local needs	2/20/2026 12:53 PM
39	I do not support a SAP. Zoning and Overlays are sufficient.	2/20/2026 12:18 PM
40	Needs to be more restrictive	2/20/2026 9:10 AM

Community Feedback Survey: Specific Area Plans (SAPs)

Q10 Do you think that there are parts of the proposed SAP for your area that are unclear or require simplification?

Answered: 118 Skipped: 6



Answer Choices	Percentage	Responses
Yes*	69.49%	82
No	30.51%	36
Show comments		
Total		118

Community Feedback Survey: Specific Area Plans (SAPs)

#	*IF YOU ANSWERED YES, PLEASE PROVIDE MORE INFORMATION.	DATE
1	Too most of it - it is very hard to digest what is being proposed	3/5/2026 8:49 PM
2	No discussion on compensation. Not consulted in first place. Why is Kingborough different to other Councils.	3/5/2026 2:29 PM
3	Get rid of it or pay significant compensation to land owners for giving up usage rights in favour of green oriented movements. The Product Planning Commission recommended substantial compensation be paid by Councils if they want privately owned land preserved for public benefit.	3/5/2026 2:27 PM
4	the mere ability for the average person to access the details applicable to their site	3/5/2026 12:14 PM
5	It is unnecessary ,duplication and more expense for owners. Don't do it	3/5/2026 11:05 AM
6	Wastewater should be a general standard for everywhere. Vegetation management particularly as in bushfire prone area.	3/5/2026 10:56 AM
7	When agreed, the readability/dissemination of SAP information could be improved/simplified through use of interactive webpages etc	3/5/2026 9:21 AM
8	No evidence has been provided to prove that any of the so called endangered animals are present in our area. In 25 years living here I have never seen any of those listed. If the Tassie Devil was here we would see it on the roads as we do in other areas of the state that have a population	3/4/2026 8:40 PM
9	Documents of this type are broadly not written for the general population.	3/4/2026 8:14 PM
10	See answer to Q8. I worry that the desire to protect every tree on a low density residential block can make it incredibly difficult to balance all the constraints even for a very modest size house.	3/4/2026 5:52 PM
11	Roads	3/4/2026 5:16 PM
12	Not having one at all. too restrictive, unfair as other Kingborough council area properties with the same zone do not have this additional costly administrative burden just to do a devgelopment when the current overlays provide all the same or similar protections.	3/4/2026 3:07 PM
13	Prefer not to indicate specifics, other than it requires further local community involvement	3/4/2026 2:20 PM
14	Fire management plans.sensible vegetation removal for fire safety reasons. Council weed management program . Questions around the word discretionary when applying for building permits or other projects. The offset clause using bruny environment to offset development in urban kingborough areas,	3/4/2026 2:15 PM
15	Entire document as it fails to reflect community values. It fails on equity grounds as many issues discussed occur across the wider Local Government Area. It introduces new standards that are not justified given the adequacy of current planning provisions. Presents an unacceptable & onerous cost to the community, especially around determination of what is permissible, given the vagaries of the proposed provisions. Fails to justify ESD principles. Fails to consider the extent of existing covenants for wildlife conservation. Note it operates in isolation as sets aside the potential impact of developments on the western side of the d'Entrecasteaux channel on Bruny Island . Note that mapping errors exist. Note that the colours of blue, yellow, orange, pink & red exist in the natural landscape	3/4/2026 1:40 PM
16	I don't understand why my land has been classified Landscape Conservation. I have been living here for several decades and the land was zoned Rural when I bought it. Since then thousands for tourists are visiting the island. Is the proposed zoning for their benefit. Why isn't Landscape Conservation only applied to non-private land	3/4/2026 12:03 PM
17	the whole lot is unclear because It allows for Planners opinions to be put in to place. Planner's individual likes and dislikes have way too much input.	3/4/2026 11:16 AM
18	no justification for broad scale landscape conservation zoning - is it for the tourists?	3/4/2026 10:23 AM
19	The complexity and unreasonable extent of regulation, in addition to SPP zoning and code provisions, providing applicants (particularly lay applicants) with little certainty or guidance when navigating the SAP. Furthermore, there are unclear definitions with no legal precedent (e.g. Natural Values), providing Council with an unacceptable level of discretion when assessing applications. Finally, uncertainty regarding additional use and development requirements that are overly vague and subjective.	3/4/2026 9:45 AM
20	The complexity and unreasonable extent of regulation, in addition to SPP zoning and code	3/4/2026 9:35 AM

Community Feedback Survey: Specific Area Plans (SAPs)

provisions, providing applications (particularly lay applicants) with little certainty or guidance when navigating the SAP. Furthermore, there are unclear definitions with no legal precedent (e.g. 'Natural Values'), providing Council with an unacceptable level of discretion when assessing applications. Finally, there is also uncertainty regarding additional use and development requirements that are overly vague and subjective.

21	a residence in LCZ is discretionary and the performance criteria is , "A use listed as Discretionary must have regard to the local area objectives. This is ridiculously vague	3/3/2026 10:53 PM
22	It's not that the plan is unclear, the council's intention is unclear. Why does it have to be changed? Is what propose better for residents?	3/3/2026 6:36 PM
23	It is unclear which parts of the Bonnet Hill area the SAP applies to and why. The definition of "coastal proximity" is written to encompass lots that a nowhere near or don't even overlook the coast.	3/3/2026 3:18 PM
24	KIN-S6.1.8 why limit collision risk to threatened bird species only. What about other threatened species collision with vehicles? KIN-S6.2.3 Is an arboriculture assessment required for removal of trees from an existing house HMA? Trees within HMAs of existing driveways and houses should be manageable without red tape or penalty. KIN-S6.4 Terms - artisan food and drink industry - why must it include at least one of the following a-c? That seems unnecessarily restrictive to future entrepreneurs' imagination. Indirect impacts - Aren't poisoning, ringbarking and uprooting direct impacts? Impacts should include flora and fauna. 'Locally significant flora or fauna species' - clarify that this needs to be scientifically determined and not by KC.	3/3/2026 3:16 PM
25	The preamble is generic and vague; it doesn't reflect our aims and visions.	3/2/2026 10:25 PM
26	No good reasons demonstrated for more stringent building restrictions being applied to Bruny Island to elsewhere in Kingborough. Not clear how the SAP addresses its proposal for Bruny being a low-key tourism destination. Not clear how the SAP helps to address the unique qualities of Bruny Island in relation to community and isolation.	3/2/2026 8:27 PM
27	There should be a summary of direct effects vs existing plan	3/2/2026 6:11 PM
28	It is a labyrinth, where the way to read it and understand it is not obvious. I had to spend a day on it, just to get my head around it.	3/2/2026 11:51 AM
29	Applicability across zones	3/2/2026 10:47 AM
30	It Isn't clear how tourism management is addressed	3/2/2026 8:41 AM
31	Why is it required and how can it be varied to suit the different types of blocks and houses in Bonnet Hill	3/1/2026 4:45 PM
32	The proposed SAP boundary encompasses many different 'styles' or type of residential block which have been developed over the past 100 years. These ranges from the higher density of Tyndall Court, through 3/4 acre blocks in Regnans and Stringybark to larger 1-2 acre blocks on the top side of the highway. The SAP as proposed is a 'one size' fits all model that does not work for all e.g. setbacks and size of buildings could and should vary with the size of the property. The limits and controls already applied in the standard clauses of LUPA and Low Density Residential zone are more than adequate. The language and layering effect of standard zones, extra zones and the SAP are confusing and too dense to understand .	3/1/2026 4:41 PM
33	I started to read a bit of plan, very lengthy and hard to understand	3/1/2026 1:16 PM
34	Does no apply to my situation	3/1/2026 11:54 AM
35	I can not see room for incorporating the ideals sought within the existing structure	2/28/2026 7:12 PM
36	I'm not sure that I fully understand the details proposed, but I like the plan purpose.	2/28/2026 7:04 PM
37	It is challenging trying to understand some of the zonings and in particular the reasoning behind some of the borders between zoning areas.	2/28/2026 6:46 PM
38	Coastal Proximity. Does the 5m Building Height limit apply to buildings on top of a 25m high cliff or is it only intended for beach front use?	2/28/2026 1:43 PM
39	Landscape Conservation zone is inappropriate in the case of my land.	2/28/2026 9:06 AM
40	They should be removed in full	2/27/2026 8:58 PM
41	Requires removal along with other SAPs. Kingborough approach to SAPs is excessive and inconsistent with other councils approach. Provides unnecessary over governance which adds layers of costs for impacted property owners	2/27/2026 8:43 PM

Community Feedback Survey: Specific Area Plans (SAPs)

42	Over complicated and too restricted.	2/27/2026 6:25 PM
43	More emphasis required on lowering impacts on infrastructure (roads, water, public amenities).	2/27/2026 4:58 PM
44	It unnecessarily overrides planning zones	2/27/2026 4:13 PM
45	Simplification to aid lay person understanding	2/27/2026 3:37 PM
46	Block is cleared only grass	2/27/2026 10:45 AM
47	I found the document confusing, and hard to understand. It's not written in plain english.	2/26/2026 7:53 PM
48	Recognition of existing developments criteria (ie setbacks) that may be rendered non compliant as a result of new larger lot sizes. Modification of bird strike provisions which would prevent the effective use of the property in most sites.	2/26/2026 4:38 PM
49	To many of the requirements are designed so that a single planer can site to broad a field of information to greatly restrict or veto a persons ability to develop there land. For example. Potential habitat (every thing is Potential Habitat for something) Published and unpublished scientific papers.(who is to determine what papers are reverent and how is it proposed to manage in built conformation biases)	2/26/2026 9:35 AM
50	The whole thing is complex	2/25/2026 2:15 PM
51	Appears to be complex	2/25/2026 2:05 PM
52	A definition of resource development would be useful nut perhaps I missed it,	2/24/2026 9:18 PM
53	Some rules are very expensive to comply with for no apparent gain	2/24/2026 9:05 PM
54	Difficult to say from information provided	2/24/2026 9:05 PM
55	see below	2/24/2026 8:04 PM
56	Yeah, everything thats discretionary	2/24/2026 7:30 PM
57	Plain English with illustrative examples	2/24/2026 6:55 PM
58	Rationale for the spatial extent of the SAP	2/24/2026 6:52 PM
59	Is this for existing properties with houses or only for new development. That's not clear.	2/24/2026 5:47 PM
60	Supports low profile tourism? The place has been ruined by tourism with too much traffic, too busy and noisy with short term rentals, ferry infrastructure overwhelmed on a regular basis. Urban development such as at Dennes Point has destroyed critical habitat for bird life and has trashed the formerly quiet character of the place. The dirt road is unable to cope with current levels of traffic while new divisions have been approved. Owners are threatened with increased rates if the road were to be sealed. KC has asked, and has not listened, and now asks again after the damage is done.	2/24/2026 10:17 AM
61	Water, and fire mitigation plans for specific areas that have the potential to be isolated in a wildfire event	2/23/2026 3:11 PM
62	I think it needs to be scrapped and re-done with proper consultation from residents	2/23/2026 1:10 PM
63	All of it! It is very long winded and complicated. I found it difficult to access information relevant to my situation	2/23/2026 10:12 AM
64	The SAPs are not required- too much regulation!!	2/22/2026 7:45 PM
65	It is overly complex and there is no guide on how to read and understand it. It also reimposes restrictions in the current zoning that the rezoning removed. so, what is hte point of the rezoning?	2/21/2026 11:01 AM
66	No mention of excessive visitation	2/21/2026 9:29 AM
67	Everything has been slipped through the cracks with almost zero acknowledgement to the private land owners.	2/21/2026 8:52 AM
68	Everything, no more jargon to confuse people	2/20/2026 6:34 PM
69	All of it is too restrictive	2/20/2026 3:58 PM
70	Businesss should have a more clear path to help achieve long term goal. Otherwise they will just go broke within the first one or two years	2/20/2026 3:44 PM
71	All of it. Don't see the need for this extra layer of restrictive bureaucracy	2/20/2026 3:24 PM

Community Feedback Survey: Specific Area Plans (SAPs)

72	Some people still are not aware of the planning changes, let alone a sap	2/20/2026 2:45 PM
73	Planning rules are complex for lay people to understand. Overlaying SAP over existing adds complications. Some of the judgements that need to be made appear to be very subjective.	2/20/2026 1:30 PM
74	Not enough clarification, there are uses mentioned but no breakdown of what constitutes that use and no explanation in the "Definition of terms", It would appear that the SAP was written by someone with town planning or similar background and the rest of us have to try and guess what is meant from a council perspective.	2/20/2026 12:55 PM
75	Whilst there may be some areas that need more restriction the application is too broad	2/20/2026 12:53 PM
76	I do not support a SAP. Zoning and Overlays are sufficient.	2/20/2026 12:18 PM
77	The whole document is unnessacry and convoluted, we already have enough issues on bruny without extra rules and regulations	2/20/2026 11:17 AM
78	Vegetation 'protection' is not clear but clear enough to know that the current vegetation 'fire hazard' is critical & more clear & open consultation is very much required to prevent a bushfire disaster	2/17/2026 1:47 PM

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Community Feedback Survey: Specific Area Plans (SAPs)

Q11 Are there any changes you think would improve the plan? (optional)

Answered: 82 Skipped: 44

#	RESPONSES	DATE
1	better explanation. Also what is going to happen with people who flout the rules - like poisoning large protected trees and cutting a driveway into sensitive sand dune areas with no approval - why should anyone be expected to follow planning procedure when these people do whatever they want and there are no actual consequences? It makes this whole process meaningless	3/5/2026 8:49 PM
2	Proper consultation, proper compensation as people purchased these properties under existing schemes. Also had future visions which are no longer viable.	3/5/2026 2:29 PM
3	If you bother to listen to your constituents and conscious there will be no plan. This is our land not the Communities	3/5/2026 2:27 PM
4	make it more user friendly and accessible	3/5/2026 12:14 PM
5	No get rid of it. The zoning system provides all required planning controls .Professional planners ,including past Council planning officers, do not support it	3/5/2026 11:05 AM
6	Bonnet Hill is a beautiful area to live, I don't think a SAP is necessary as there are many other areas in Kingborough with similar values. Should be included in the broader LPS not specific to Bonnet Hill. Also I think the survey was a bit cumbersome to get my thoughts across with a particular style and wording that maybe not allowed a full understanding of people's concerns.	3/5/2026 10:56 AM
7	Remove it. It is not required, justified nor appropriate for the diverse size and type of blocks here.	3/4/2026 8:40 PM
8	The plan seems quite bias towards protecting vegetation, which seems to conflict with the Fire Services Act.	3/4/2026 8:14 PM
9	Delete the SAP for Bruny Island and use current overlays, don't overcomplicate things, reduce impediments to help people build a house, do not increase them with unnecessary SAP's	3/4/2026 3:07 PM
10	Only in my opinion, It requires an independent audit, and feasibility study. Both should be presented to the public.	3/4/2026 2:20 PM
11	Sensitivity and understanding of people's needs in rural areas, Clarity not discretion when applying for planning permits, General simplification of the planning process which is clear and accessible for all.	3/4/2026 2:15 PM
12	Yes, the Bruny SAP should be revoked and the SPP prevail. The matters supposedly being addressed in the SAP are already adequately addressed under the existing legislative and policy settings.	3/4/2026 1:40 PM
13	I don't think zoning my property as Landscape Conservation will add anything to the Planning Scheme. It was previously zoned Rural and the values in the proposed scheme for land zoned Rural there are adequate protections under that zoning for wildlife, landscape, vegetation preservation/protection. It appears that I am being discriminated upon due to the lack of State and Local Government protection of public land.	3/4/2026 12:03 PM
14	Any SAP should be council wide and more prescriptive not discretionary.	3/4/2026 11:16 AM
15	allow landowners to be able to change the landscape conservation zone imposed on their property, ie to rural which has environmental protections as primary consideration but allows for many more property purposes which may meet needs in the future	3/4/2026 10:23 AM
16	The SAP should be responsive to the long-term environmental and socio-economic sustainability of Bruny Island. Accordingly, we submit that a primary objective of the SAP should be to give landowners, particularly those operating agricultural enterprises, adequate opportunity and flexibility to diversify revenue streams. A key example would be to promote opportunities for cottage industries and sustainable agri-tourism. These further economic opportunities are vital for the economic viability of farming properties such as ours, and the creation of secure local jobs. Further, supplementary revenue streams inevitably lead to	3/4/2026 9:45 AM

Community Feedback Survey: Specific Area Plans (SAPs)

better ecological outcomes, as it provides famers with adequate financial security to reduce stock numbers and agricultural inputs.

17	The SAP should be responsive to the long-term, environmental and socio-economic sustainability of Bruny Island. Accordingly, the primary objective of the SAP should be to give landowners, particularly those operating agricultural enterprises, adequate opportunity to diversify revenue streams (e.g. cottage industries and agri-tourism).	3/4/2026 9:25 AM
18	simplify it.	3/3/2026 10:53 PM
19	Both A1 and P1 of "10.6.1 Lot Design" of the incoming Draft LPS (resulting block sizes from subdivision being 1500m2 and 1200m2 respectively) are more than sufficient to maintain sensible development while maintaining flexibility within the low density residential zoning. The SAP "KIN-S4.8.1 Lot Design" clause which supersedes the LPS Lot Design provisions above are overly restrictive, and in-short simply not necessary given that this is sufficiently dealt with by the LPS provisions. Specifically the P1 performance criteria that only allow for 100m2 below the specified lot size in A1. This provides little to no flexibility at all. We would like to see SAP "KIN-S4.8.1 Lot Design" removed entirely from the SAP, and simply let the LPS handle this particular aspect as drafted allowing for the 1200m2 performance criteria P1. This provides suitable flexibility. The remaining sections of the SAP are acceptable to us, with the exception of the above.	3/3/2026 9:15 PM
20	Changing zoning to apply to those already living is unfair. Unclear as to why the council wants to change and what plan do they have for the change?	3/3/2026 6:36 PM
21	Why does the SAP exist? Low density residential should be just that. Based on the justification and definitions provided, it seems the only purpose is to generate more income from environmental offsets and inhibit a land owners ability to build, renovate or subdivide (for the few with lots big enough)	3/3/2026 3:18 PM
22	Yes, there are changes that will improve the plan. It needs to be carefully reviewed. The following are some additional suggestions and questions to clarify within the SAP. Based on Figure KIN-S6.2 the only areas that are not Natural Values Area appear to be agriculture and beaches. This needs to be better explained in KIN-S6.1. Would a Zoning map in the SAP help to make it a stand alone document or does it have to be read in conjunction with the TPS or does the SAP completely replace normal zoning? This needs to be made clear in the SAP as KIN-S6.2.2 suggests the provision are in addition to the TPS Zoning provisions. Terms like 'seral' and 'disclimax' should be explained for lay person. KIN-S6.4.1 - potential habitat and significant habitat - delete (b) expert opinion; and/or because there are many experts with differing opinions. -substantially detract from - There is too much grey area to be interpreted. Most if not all of the information listed is provided in a Natural Values Assessment (NVA). If it is not included, modify the requirements of the NVA instead of including in SAP. Why does the suitably qualified person (onsite waste water management) have to be specified in the SAP? Isn't it in the TPS? KIN-S6.5.1 Low Density Residential Zone - Food Services (b) not for take away food premises with drive through facility is confusing. If this means take away with a drive through is not permitted i.e. prohibited then it should be stated elsewhere i.e. in definition of food services or under Prohibited. Avoid use of double negatives - Utilities - If not listed as No Permit Required. Are motor repairs and panel beating prohibited in the Village Zone? KIN-S6.5.4 Where is Passive Recreation defined? KIN-S6.7 P1 needs editing I hope my points are clear, it is difficult to be succinct and reference everything. I would like to have used italics for SAP text to differentiate from my own. Thanks for the opportunity to comment.	3/3/2026 3:16 PM
23	Re write in consultation with community .	3/3/2026 1:25 PM
24	Abandoning the plan. My understanding is that SAPs were intended for specific areas of high conservation value native vegetation, not an entire diverse, island with at least two hundred years of white development, farming, settlement, community, land management etc. The SAP appears not to recognise any of that, and only prioritise nature conservation. It also appears to give the planning department of the council extraordinary powers regarding any development at their discretion. My understanding is that the idea of the statewide planning scheme was to simplify the planning process and give clear understanding of the zoning and requirements for particular areas. The SAP seems to do the opposite of that.	3/3/2026 12:24 PM
25	Bruny Island is a unique and special place with spectacular scenery, abundant wildlife, a relaxed and uncrowded lifestyle. It has challenges including access, roads, waste removal and other public infrastructure. Development needs to be carefully managed to take into account these challenges and not add to pressure on the island's unique beauty, flora and fauna and lifestyle.	3/3/2026 11:33 AM
26	YES. SCRAP IT	3/3/2026 9:45 AM

Community Feedback Survey: Specific Area Plans (SAPs)

27	Stipulate national and state standards, spell out aims and controls that are specific to Bruny and derived from our strategic objectives.	3/2/2026 10:25 PM
28	Yes- the changes do not reflect the needs of the community -does not take into account the 'shack' history and character of the island that should be protected- this does include some bold colours in proximity to coastal areas. -vegetation and fauna protection does not consider the local ecological communities which are better protected via overlays which are specific to the vegetation quality and specific location - the restrictions limit ability to provide for extended family living where sharing wastewater treatment may be appropriate, ability to maintain the community's ability to live on the island and service the tourism industry is essential. To facilitate this, the ability for multigenerational living is essential to provide aged care support etc. -the SAP doesn't do anything to direct or guide tourism, particularly around potable water use pressures of tourism and other infrastructure needs - The planning controls would be better if they were informed by specific natural values assessment, appropriate infrastructure and strategic planning to provide for the needs of the community and to better protect areas of high quality vegetation. -the use of TPZ is outdated and should be replaced by Notional Root Zone	3/2/2026 9:51 PM
29	Invite the community to propose a list of qualities that they consider special about Bruny Island for consideration and discussion in the preparation of a Bruny Island SAP.	3/2/2026 8:27 PM
30	The best way to improve this plan is to abandon it and not have one. There are rules and restrictions enough in the state planning scheme and the zoning as it applies to each block. The SAP is unnecessary and a sneaky way to reimpose restrictions that the rezoning of my block removed.	3/2/2026 11:51 AM
31	Consultation with landowners	3/2/2026 10:47 AM
32	Tourism management should be part of the plan. Many properties on Bruny are already managed as air bnb and there should be consensus as to whether fewer, more or the same are required. It is likely that many "shacks" are officially or unofficially operating in this sector. How many shacks come close to meeting standards of the plan? Shouldn't there be provisional plans for public toilets across the island? How can waste management be better managed - day visitors, shackles and longer stay visitors regularly dispose of rubbish illegally (possibly permanent residents too). What bushfire safety standards should be applied to vacant blocks? Not all these points may be directly relevant to the plan but should certainly be considered by Council.	3/2/2026 8:41 AM
33	Remove it or improve it (significantly)	3/1/2026 4:45 PM
34	Yes, there are a number of options open to Council to improve the plan. These include 1) Withdraw the Bonnet Hill SAP (preferred). 2) reduce the boundaries and the number/complexity of controls. 3) Provide a more robust justification, not putting any weight on 'the retention of vista for residents of Kingston Beach' unless Kingston Beach and Kingston Heights are going to have equivalent restrictions placed on their properties. Evidence needs to be provided to support the claims of impacts on endangered species and the measurable benefit that the SAP would have on these, versus no SAP and rely on the current controls. This survey could also be improved by asking if other residents feel that the SAP is warranted (Yes/No) and what particular aspects of living in Bonnet Hill they would want to see preserved (e.g. my view of the sea has been inhibited by the growth of trees under council's policies, so my vista needs to be preserved, just as much as the vista from Kingston Beach does.	3/1/2026 4:41 PM
35	Stop people building structures on the beach that are below the high tide mark. A number of permanent sea wall/treated pine wall have gone up on Nebraska beach, Dennes point and a number of them have been build below the high tide mark. Some also have decks attached to them. People have also increased the size of boat sheds when rebuilding them.	3/1/2026 1:16 PM
36	One plan does not fit the whole of Bruny	3/1/2026 11:54 AM
37	Reference is made to map overlay KIN-S6.3.1.1 but I couldn't see that in the PDF linked to in this survey?	2/28/2026 7:04 PM
38	I think there is a need for consultation with landowners, particularly those who have owned and managed their property for many years. It is concerning to suddenly discover that someone else is changing what's possible on the property. I specifically found the land usage restrictions to be a concern should I wish to either open a home based business (other than tourism related) or to build another building on the property. I would like to see better communication with landowners, particularly elderly who have been living here for years but may not be able to use technology the way younger folk do.	2/28/2026 6:46 PM
39	As above, separate SAP's are needed for the two areas	2/28/2026 1:43 PM

Community Feedback Survey: Specific Area Plans (SAPs)

40	Being able to mitigate bushfire risks more easily. Reduce fuel loads/vegetation without so much oversight and fees. Less restrictive planning red tape and costs.	2/28/2026 1:30 PM
41	More flexibility in the Landscape Conservation building provisions is required. At the moment, it would appear to prevent a building on a vacant block I own. The block is surrounded by other lots with buildings on them already. They are all zoned Landscape Conservation. The zoning effectively makes the lot worthless. We have a Part 5 agreement already that specifies that a building is allowed. A lot of expert advice went into the original subdivision.	2/28/2026 9:06 AM
42	Full removal and a proper approach established by council post roll over of the new planning scheme	2/27/2026 8:58 PM
43	Removal of the proposed SAP and other similar proposed SAPs	2/27/2026 8:43 PM
44	No review of Specific Area Plan on Bruny Island	2/27/2026 6:25 PM
45	Get rid of it and rely on the normal planning controls of the relevant zones	2/27/2026 4:13 PM
46	Scrap it	2/27/2026 10:45 AM
47	A clear one page summary written in plain English, not using jargon and excessively technical terms, that outlines the main points the document is trying to make, and highlighting potentially issues. It needs to address the restrictions to building on your own land in any form. It also needs to outline the additional compliance costs they land owners will be burdened with, the additional time it will take to meet the compliance requirements. There needs to be a clear mechanism in place for disputes between the planning body and the local residence to be heard in a timely and non-costly manner. There needs to be a clear "No Disadvantage" clause added so that existing and future landowners are able to build on their own land.	2/26/2026 7:53 PM
48	Delete unproven birdstrike provisions in favour of a public awareness programme backed by evidence for the ACTUAL conditions. Retrofitting as an aim would be far more effective.	2/26/2026 4:38 PM
49	Yes the Bruny Island SAP should be suspended until there has been extensive community consultation. Development and land use could successfully be managed under the new planning scheme without the SAP in place as it historically has been. This survey does not constitute consultation.	2/26/2026 9:35 AM
50	What infrastructure upgrades need reviewing eg road at entrance to properties who provide tourism activities. as an example make sure that parking areas are free from water holes. So people can alight from Buses without getting feet wet. This would money well spent.	2/25/2026 5:10 PM
51	Council need to provide more facilities so that tourists don't wreck the beauty of the island ie better signage to direct cars where to park, toilets & rubbish bins, signposted tracks to protect vegetation	2/25/2026 4:34 PM
52	Do a simple version	2/25/2026 2:15 PM
53	It is a difficult document to read. I would like more use of colour to differentiate the zones when scrolling through it. I am concerned that all the requirements for change and development will make life difficult for the poorer members. I also hope it won't be too difficult to adjust the plan if necessary if there are hiccups after it has come into being,	2/24/2026 9:18 PM
54	Rules need to be simpler and more clearly defined.	2/24/2026 9:05 PM
55	I think saying the Bruny SAP is "proposed mainly to manage development carefully, due to the island's limited infrastructure such as wastewater systems, drainage and drinking water. Unmanaged growth will place too much pressure on these services and change the character of local settlements.." shows a lack of understanding on what has already happened ; the horse has bolted, not because of development but because of tourism. The Adventure Bay aquifer is dry with water being trucked onto the island again this summer, (thanks also to the excess use of the artisan food and drink manufacturers, and the airbnb's) , the Adventure Bay public toilet holding tank is pumped out 3 times a week due to tourist use (all buses stop there), and Lighthouse Road is throwing up dust due to the amount of traffic it takes making it unpleasant to live amongst. The SAP encouraging tourist developments on gravel rounds in residential areas is ludicrous, considering the desire to manage development carefully to prevent 'change in the character of local settlements'. Changing the character with Tourism is acceptable but changing the character by allowing a natural growth in the residential population by encouraging appropriate sized subdivision in existing settlements is not?? The Bruny SAP encourages tourism to the detriment of the residential population and existing infrastructure. It doesn't plan for the recently announced Child Care Centre and how that could positively lift the population of the island , and gives no indication where an Aged Care Facility might be permitted. I think the Bruny SAP needs	2/24/2026 8:04 PM

Community Feedback Survey: Specific Area Plans (SAPs)

a re-write that is less focused on the view the tourist sees and what the tourist can do when visiting the island, and more on the residential population and positive community growth.

56	Just stick to state building rules , the same as all the other areas in Tasmania.	2/24/2026 7:30 PM
57	Trees and bush get out of hand very quickly in this area which is also a fire hazard which is of great concern when you would be so restricted in what you can do going forward...much clearer guidance on allowed activities is required.	2/24/2026 6:55 PM
58	Make it clear why this is being introduced and why parts of Bonnet Hill are not included, including newly built properties that clearly do not align with the SAP values	2/24/2026 6:52 PM
59	As said above, I would include the larger land parcels in the area to prevent overuse and mismanagement. Many locals appreciate the space and amenity these larger parcels allow for.	2/24/2026 5:47 PM
60	A SAP is not required for Bruny Island. Yes Bruny Island is a special place, but so is Tasman Peninsula and South Arm. Neither of these places requires a 26 page SAP or PPZ. Just an over reach by Kingborough Council who want to satisfy their own goals rather than consult with the community and ignore what the community wants.	2/24/2026 5:02 PM
61	Cap tourism visitor numbers. Cease approval for short term accommodation. Maintain roads, especially dirt sections to eliminate corrugations on a weekly basis. Purchase unsold vacant lots and rehabilitate natural ecosystems aspects.	2/24/2026 10:17 AM
62	Don't apply a sap	2/23/2026 8:54 PM
63	Yes, community based fire management plans for Bruny areas ie nth Bruny, great bay, Adventure, Simpson, Alonnah, Lunawanna, Cloudy Bay, Daniel's Bay and Lighthouse road.	2/23/2026 3:11 PM
64	I think it needs to be scrapped and re-done with proper consultation from residents	2/23/2026 1:10 PM
65	Please scrap SAPs altogether. Preference is for less green tape, less red tape, and more property owner rights to management and stewardship over my own land. Regarding building development, Blackmans Bay does not need another Mary's Knoll disaster. So the only aspect I agree with is lower density developments. However, addition of granny flats, tiny homes, renos to accommodate extensions should be up to property owners. Individual property owners are currently over regulated and don't need these SAPs, but developers get away with vegetation clearing for \$ and high density developments.	2/22/2026 7:45 PM
66	The plan for us has strong merits. Overall we are supportive. What we do not have faith in is Kingborough Council being able to reasonably interpret and manage the plan. We have such a long list of horrible stories of landowners spending so much time and effort and large sums of money to convince council of simple common sense measures that should be clear to interpretation and easy to solve in 'sit down meetings'. One of the planners in Kingborough has common sense. The others seem to have little regard for what happens on the ground and the consequences of the requests for further work / information, which may be a tick on a box, but to a landowner could be thousands of dollars and many months to wait. We know of people who have had several years to get housing approval, and others who are \$40,000 in fees and consultants and reports before they have begun to build. Simple requests knocked back due to poor interpretation. Our point is that this is before a plan which has greater restrictions, which we may agree with, but it will likely be hell for landowners looking to simply grow a business over time, add on a room for their children, build a new shed, upgrade driveway, rebuild their septic system to a better standard, improve their house for energy efficiency, install new solar panels, put up a wind turbine, build a community garden. the amount of reporting, administration, consultants and reports that many of these would require will make them unaffordable or simply unachievable. It will lock the island into those who can afford the above, and those who cannot. And the aim of avoiding large development means smaller players, but it is the developers who can afford the time and money to go through council to grow their businesses, and have the lawyers to override such plans. The 'small boutique' operations that the plan aspires to will find it harder than ever to grow and survive long term. The current culture of Kingborough council is to apply heavy measures and misinterpret the guidelines and general state planning. It cause huge stress for residents, most of whom are alienated by years of poor decisions and strange requests. Find someone on Bruny Island who thinks Kingborough council is great. In previous councils we have worked with we sat down with the council before we began a project to see what we could and could not do, and worked through it with council, with the same person through the project. Kingborough is too big and run by planners who do not have the time or regard for Bruny Island. So we support the plan in principle, but in reality it gives us great fear for the future of business, community and our children's ability to live here long term.	2/21/2026 10:11 PM
67	Do not/not have a SAP. Get the zoning right for each block or group of blocks. The SAP is	2/21/2026 11:01 AM

Community Feedback Survey: Specific Area Plans (SAPs)

yet another level of unnecessary and restrictive controls. At present, it is difficult to see what property rights owners of land actually have. It seems almost every activity on our blocks is prohibited - and any activity requires a permit. For instance, I need permission to emplace a water tank for bushfire purposes. That will require, I was told, an environmental assessment, a planning application - and the cost of both exceeds the cost of the tank. The spot for the tank is open ground, no trees and about 30m from the gate. Why is an EA necessary? Then we come to the fact I was told I needed permission to build a wood shed, a chicken coop, a dog kennel (for one dog) or a small storage shed. Your rules are contradictory and absurd. CBOS says I can build a 3x18 shed; but Kingborough says, no, I need permission. And must lodge an application. The council actually link to the CBOS leaflet. I know dozens of people who have built 3x18 sheds, using the CBOS permission. But it seems that, according to the council these are illegal. I am not permitted even to put a temporary storage shed or container (to be removed later) on my block, or, I was told, to camp there or collect wood or in the winter months, light a small fire and boil the billy. So, what do I actually own? It seems I have no property rights at all over my block. I can walk on to it, walk around but not stay. No wonder people are cranky. In sum, clear, consistent (especially with the Government) guidance on what you can and cannot do, but not so restrictive as to deprive owners of their property rights.

68	Implement a plan with cooperation of Sealink to reduce number of day visitors	2/21/2026 9:29 AM
69	Don't be so restrictive on individual properties on Bruny island. What works for Kingston doesn't work for the island	2/21/2026 8:52 AM
70	Remove the SAP	2/20/2026 7:31 PM
71	Get actual locals and those with knowledge about the negative impacts that these are going to have on the people.	2/20/2026 6:34 PM
72	There should be coordinated policy to restrict dogs in the island in ways nowhere else is allowed. The beach should not be their reign. It seems to me that people that have recently moved to the island to live permanently have too much power over the future of the island. They are themselves tourist everywhere else they choose to go, while they are constantly complaining of the island's tourists. This hypocritical approach is denying the island of proper policies. Tourists have always been a big component of the island. Shacks have existed in all areas and if the island is to succeed in being a desirable place to live and visit, we need medium density development near established areas to accommodate the needs for workers and seasonal accommodation. At the same time, I believe a policy to restrict daytime visitors needs exploring. They are putting too much pressure on ferry times. Perhaps they should be restricted to specific times to catch the ferry and having pre-purchased ferry tickets. And anyone that is not a resident or property owner, should include a Parks & Wildlife fee in the ferry ticket, so they can't get away without paying when visiting certain areas. New businesses should be helped and encouraged. And old businesses helped to improve their services.	2/20/2026 3:44 PM
73	Get rid of it. Not needed. Stick with the STATEWIDE planning scheme.	2/20/2026 3:24 PM
74	On ground proof and testing	2/20/2026 2:45 PM
75	The question of over tourism HAS to be dealt with. There are too many tourists (day trippers). There needs to be a limit on the number of daily visitors, less than are allowed/possible now. The island is way over hyped compared to what people find when they get here, nevertheless they continue to come and use the scarce resources of the island (eg. places on the ferry, water, rubbish, roads). The ferry makes it easy to limit tourist numbers (especially those with cars), yet it doesn't happen. Tourist operators who operate their own transport options are fine (eg. pennicotts), but tourists driving on hazardous dirt roads to get to a cafe that isn't even open are a major problem for locals.	2/20/2026 1:30 PM
76	Although in general agreement with the proposal, some interpretations are open .to disagreement and as consequence there appears to be no appeals process	2/20/2026 1:26 PM
77	Test	2/20/2026 1:01 PM
78	Easiest and biggest change is drop it all together. In the introduction to this questionnaire there's mention of impacts on existing infrastructure, yet no options have been offered or put up for comment on how these impacts could be addressed or mitigated. One would have thought if you are selling a SAP you would actually have a plan that is comprehensive and reflects the existing communities needs and not hope that no one is watching and what council wants goes through to the keeper!	2/20/2026 12:55 PM
79	More assessment of individual properties as some restriction is not warranted for many properties	2/20/2026 12:53 PM

Community Feedback Survey: Specific Area Plans (SAPs)

80	I do not support a SAP. Zoning and Overlays are sufficient.	2/20/2026 12:18 PM
81	Get rid of the brunny island sap, fix the roads, fix the ferry fix the track management, fix the bushfire issues, fix the mobile reception issues, fix the lack of community space, the SAP is ridiculous, we dont need more rules because we live on brunny island we neex more action from council on the current is suesand a plan to fix future issuez with the tourist influx	2/20/2026 11:17 AM
82	Absolutely & that is proper consultation with all stakeholders. These proposals have not had due consultative processes from the council to the Impacted communities thus making it a dictatorial process. In addition is the proposed cost of removing tress (almost impossible to get approval & expensive). We live in Seaview Toad & some neighbouring properties (bush blocks) have had no maintenances for more than 25 years (one borders our property). Calls & visit to council are an absolute waste of of time & yet the bush blocks are 'fuel hazards' that are a critical threat to properties & lives. The council are not interested in the issues (property owners are deeply concerned) as no matter how much we maintain our properties it is negated by overgrown neighbouring properties. Why are these issues not addressed & het council now is trying to implement more restrictive vegetation & building requirements that will result in only the very rich being able to afford to stay on this island.	2/17/2026 1:47 PM