

ATTACHMENT E - PART A



Monday 13 April 2026

Attention: Planning Manager

Email: Shane.Wells@sorell.tas.gov.au

Dear Shane

RE: 5.2022.184.1 AT 297 PRIMROSE SANDS ROAD, PRIMROSE SANDS (CT210947/1, 181036/20 & 181036/19) WITH ACCESS FROM CONNELLYS MARSH ROAD FOR – ALLURE LODGES PTY LTD

In response to your email dated 9 April 2026 and earlier discussions, please find below a final submission for the above project, together with attachments of site plans for the project as advertised, final submitted site plan, comparison of the two plans and a google image of the farmlands to add context.

This submission is provided in response to Council's recent correspondence and discussions regarding:

- Development intensity
- Rural character
- Settlement pattern
- Amendments to the application

The purpose of this submission is to:

- Clarify the final form of the proposal
- Demonstrate how the revised design responds directly to issues raised
- Confirm that the application remains capable of assessment under the applicable planning framework
- Assist Council in completing its assessment on planning merit

Applicable Planning Framework

The application was lodged under the Sorell Interim Planning Scheme 2015 and remains a live application.

Accordingly, the proposal must be assessed under the planning scheme in force at the time of lodgement, consistent with the requirements of the Land Use Planning and Approvals Act 1993.

While the Tasmanian Planning Scheme has since come into effect, the assessment of this application is to be undertaken under the Interim Planning Scheme, which provides discretion to consider visitor accommodation where it is compatible with rural character and does not unreasonably impact agricultural use.

Final Development Form

The proposal has been materially refined since public exhibition in response to feedback from

Council and the community.

Final configuration:

- 24 visitor accommodation cabins (reduced from 32)
- 18 accommodation building footprints (reduced from 25)
- 20 total building footprints across the site, including: lodge and wellness building
- Two accommodation types: Type A and Type D
- All accommodation buildings are single storey (excluding minor ancillary loft within wellness building)

Key changes since advertisement:

- Removal of 8 cabins in total
- Removal of all cabins from the western extent of the site
- Consolidation of all accommodation within the eastern portion
- Relocation of 4 cabins from the western extent to the eastern portion of the site
- Removal of 1 entire Type D building (2 cabins) on the eastern site
- Removal of Primrose Sands Road access
- Reduction and containment of development footprint

Outcome:

- 100% of cabins are now located within the eastern portion of the site
- No new visitor accommodation is proposed on the western extent of the site.
- Coastal development extent reduced from approximately 2.8 km to approximately one-third of that extent

The submission represents a clear and substantial reduction in scale, spatial impact and visual presence.

Amendments and “Substantial Change”

Council has raised concern that the amended plans represent a “substantial change”.

Respectfully, the Applicant does not agree.

The relevant consideration is whether the amended proposal represents a fundamentally different development in terms of:

- Use
- Scale
- Impact

In this instance:

- The use remains unchanged
- The scale has been reduced (32 → 24 cabins)
- The accommodation footprint has reduced (25 → 18 buildings)
- The overall building count has reduced (27 → 20 buildings including lodge and wellness)
- The spatial extent has significantly contracted
- No new impacts have been introduced

The amendments:

- Respond directly to matters raised during assessment
- Reduce visual exposure and spatial spread

- Consolidate the development footprint
- Do not introduce any new planning considerations or impacts that would not have been reasonably anticipated at the time of public exhibition.

The proposal remains the same development in a reduced and more contained form.

The most recent refinement, involving the removal of the remaining two cabins from the western extent of the site, further reduces the footprint of the proposal and does not introduce any new impacts. It represents a continuation of the same design response, namely, reducing spread and consolidating development and directly addresses a concern raised by Council.

Rural Character and Settlement Pattern

Council has expressed concern regarding a perceived “linear” or “ribbon” settlement pattern.

Change in Form

The revised proposal now establishes a fully consolidated, clustered, node-based pattern of development, with all accommodation located within the eastern portion of the site. The western coastline is retained entirely in an undeveloped state. This represents a clear departure from any perception of a linear or ribbon development pattern.

Development is now:

- Consolidated within the eastern portion of the site
- Contained within defined areas
- No longer expressed as a continuous coastal strip

Reduction in Coastal Impact

- Coastal occupation reduced by approximately two-thirds
- Western coastline retained in an undeveloped state
- Development concentrated within a limited and defined portion of the site

Relationship to Existing Settlement

The eastern portion of the site adjoins:

- Existing coastal dwellings along Connellys Marsh Road
- A pattern of linear residential settlement along the foreshore

The proposal:

- Sits within and behind this established pattern
- Introduces lower density and more dispersed built form
- Maintains substantial spacing between buildings
- It does not establish a new settlement pattern. It sits within an existing one at a reduced intensity.

Scale Relative to Farm

- The built footprint occupies a very small proportion of the approximately 700 hectare farm.

Visual Character

- Limited visibility from Fulham Road due to distance and topography
- Filtered views from water
- Buildings integrated with landform and vegetation
- The development is visually recessive.

The proposal strengthens, rather than fragments, rural character by:

- Consolidating development
- Retaining large areas of undeveloped coastline
- Maintaining agricultural use
- The removal of all development from the western extent of the site ensures that the proposal is no longer expressed across the broader coastline, but instead reads as a contained and landscape-responsive cluster.

Agricultural Use and Agritourism Integration

The site will continue to operate as a commercial superfine merino sheep farm, including:

- Approximately 1,400 breeding ewes
- Ewe and lamb operations
- Supporting infrastructure eg shearing sheds, bore and pumping stations, silos, sheds, yards, ramps are unchanged

Grazing patterns and agricultural operations will continue unchanged.

Farm Viability

The proposal:

- Diversifies income
- Supports resilience in drought and low commodity cycles
- Ensures long-term viability of the land

Agritourism Integration

The development incorporates:

- Sheep shearing demonstrations
- Mustering and livestock management
- Farm-based experiences
- Horticulture and food production
- Direct interaction with farm animals grazing around buildings and access to the property managed with grates

These activities are genuine agricultural functions, not ancillary tourism features.

Agriculture remains the primary land use, supported by tourism

Regional Integration and Paddock-to-Plate Model

The South-East region possesses the foundational elements of a premium artisan food and beverage destination but remains under-recognised.

This proposal will play a catalytic role in:

- Connecting with existing producers
- Elevating regional identity
- Supporting sustainable agriculture
- Enhancing tourism outcomes

The proposal is embedded within a network of producers across South-East Tasmania. It will:

- Prioritise local procurement
- Showcase regional produce
- Support local supply chains

- Integrate on-site agricultural production

The regional integration model is intended as a real operational approach rather than a conceptual aspiration. The development is structured to:

- Prioritise local sourcing as a core operating principle
- Establish ongoing supplier relationships
- Integrate regional products into dining and guest experiences
- Importantly, the model is supported by on-site agricultural production from commencement, ensuring operational viability independent of external partnerships.

Socio-Economic and Regional Benefit

The South-East Tasmania region is characterised by:

- Lower median incomes and higher welfare reliance
- Lower tertiary education rates
- Limited local employment opportunities
- Higher reliance on seasonal or tourism employment
- Seasonal tourism patterns
- Lower economic yield per visitor

compared with most parts of the State.

This proposal responds directly to these conditions by introducing a high-value, experience-based tourism model integrated with ongoing agricultural use.

High-Value, Low-Impact Model

Based on the revised proposal of 24 cabins, with:

- Double occupancy
- Average annual occupancy of approximately 75% (conservatively)

The development is expected to generate:

- Approximately 6,570 occupied cabin nights per annum
- Approximately 13,140 guest nights per annum

Ancillary Expenditure

In addition to accommodation revenue, guests are expected to contribute to the regional economy through:

- Dining and paddock-to-plate experiences
- Local produce and farmgate offerings
- Tours, tastings and curated experiences
- Transport and other services

On a conservative basis, this additional expenditure is estimated between \$100 to \$200 per day or \$1.31 to \$2.63 million per annum.

Regional Economic Outcomes

Importantly, this level of economic activity is generated from a relatively modest number of visitors, reflecting a deliberate shift away from volume-based tourism.

The proposal will:

- Increase economic yield per visitor
- Extend average length of stay
- Support year-round visitation
- Strengthen local businesses and producers
- Encourage further investment in the region

Local Economic Integration

The development is structured to:

- Prioritise local procurement across food, beverages and produce
- Support regional producers and suppliers
- Create opportunities for local employment
- Encourage micro-enterprises and experience-based offerings

This ensures that a significant proportion of visitor expenditure is retained within the local economy.

Strategic Position

The proposal represents a high-value, low-impact tourism model.

One that:

- Generates substantial regional economic benefit
- Does not rely on high visitor volumes
- Supports the long-term viability of rural land use and a more resilient and productive rural economy.

Conclusion

The proposal, as now presented represents a clear and deliberate refinement of the originally advertised development:

- It reduces scale
- Removes development from the western coastline entirely
- No longer exhibits a linear or ribbon settlement pattern
- Consolidates built form
- Reduces impact
- Maintains agricultural dominance of the landholding
- Integrates with and supports the regional economy
- Is consistent with the intent of the Interim Planning Scheme
- Directly addresses Council and community raised concerns

The result is a contained, low-impact, agriculturally integrated development that is capable of approval under the Interim Planning Scheme.

Request

The Applicant respectfully requests that:

- The application be assessed and determined on its merits
- Having regard to the revised form of the proposal and its consistency with the Interim Planning Scheme

Kind Regards

Jacinta Young

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Chief Executive Officer

Allure Tasmania

AERIAL SNAPSHOT FROM THE LIST MAP OF THE ALLURE FARMLANDS (RIVERSIDE) WITH BOUNDARY IN RED

ATTACHMENT E - PART B

- The built footprint occupies a very small proportion of the approximately 700 hectare farm.
- Visibility of the development will be limited and predominantly from the water.

PROPOSED DEVELOPMENT SITE



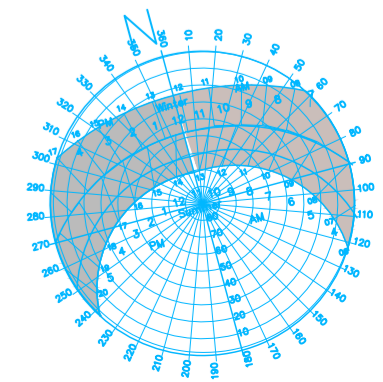
ORIGINAL PROPOSAL (ADVERTISED 2024)



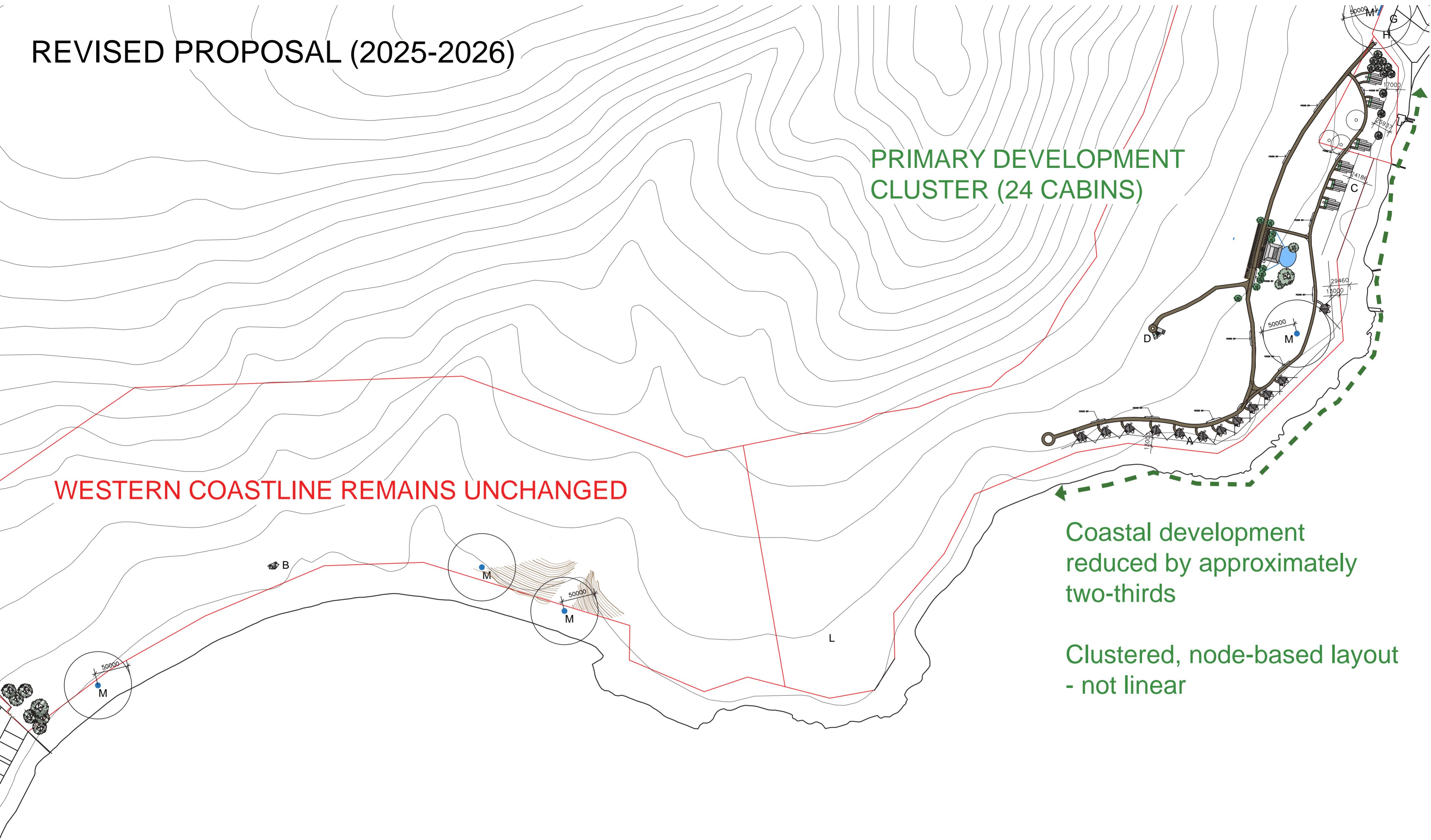
Existing cabin not included in DA

Cabins distributed across approximately 2.8km of coastline

- Linear coastal pattern
- Development extends across full western and eastern coastline



REVISED PROPOSAL (2025-2026)



PRIMARY DEVELOPMENT CLUSTER (24 CABINS)

WESTERN COASTLINE REMAINS UNCHANGED

Coastal development reduced by approximately two-thirds

Clustered, node-based layout - not linear

CALIBAN
CONSULTING

Contacts
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Drawing
No.: ANB1 DA01
Date: 13 April 2026
Scale: 1:2,500 @ A1

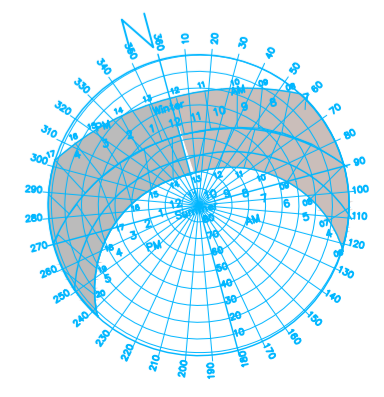
Accommodation
East: Cabin Type A 12
Cabin Type D 12
West: No new Cabins

Total 24
(excludes existing cabin)

Allure Norfolk Bay
Master Plan
vN
50 100 150 200 250 500

Key
A. Cabin Type A
B. Existing cabin (not included in development)
C. Cabin Type D
D. Massage/Sauna Centre
E. The Lodge (reception /dining)
F. Parking

G. Connellys Marsh Road
H. Allure Entry
J. Emergency Access only
K. Primrose Sands Rd
L. Grave Site
M. Aboriginal Heritage Site (refer ACHA for detailed assessment)



HOW PROPOSAL HAS CHANGED

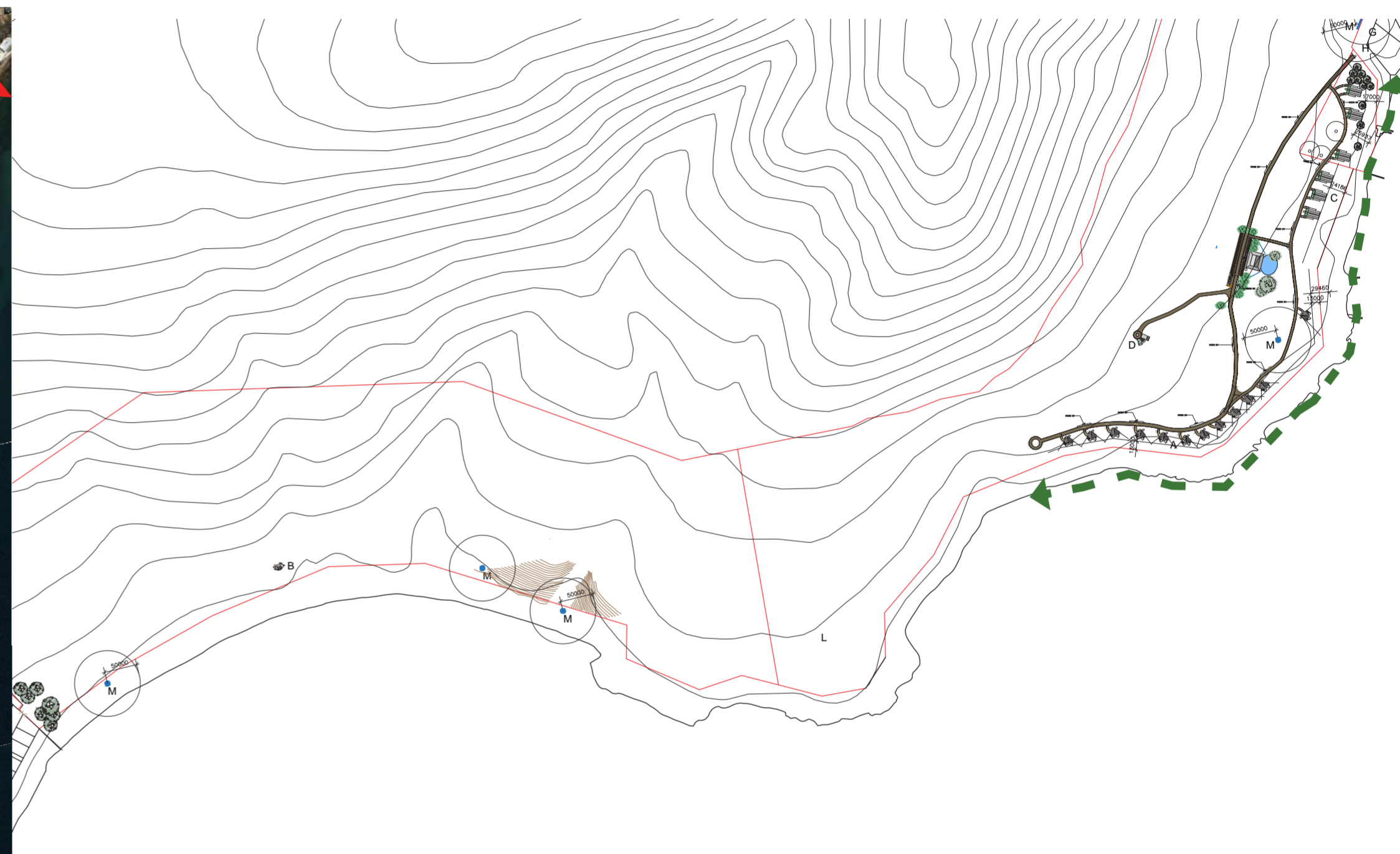
ORIGINAL PLAN



CALIBAN CONSULTING	Contacts Architect - John Lewis <small>Board of Architects of Tasmania No. 1134 Tasmanian Architect License 33352612</small> john.lewis@vetica.net PO Box 219, Orford, Tasmania, 7190 0418 445 313	Drawing No.: ANB1 DA01 Date: 6 Nov 2022 Scale: 1:2,500 @ A2 1:5,000 @ A4	Accommodation East: Cabin Type A 8 Cabin Type D 14 Cabin Type A 10 Cabin Type B 1 Total 33	<i>Allure Norfolk Bay</i> Master Plan vJ

(includes existing cabin B)

REVISED PLAN



CALIBAN CONSULTING	Contacts Architect - John Lewis <small>Board of Architects of Tasmania No. 1134 Tasmanian Architect License 33352612</small> john.lewis@vetica.net PO Box 219, Orford, Tasmania, 7190 0418 445 313	Drawing No.: ANB1 DA01 Date: 13 April 2026 Scale: 1:2,500 @ A1	Accommodation East: Cabin Type A 12 Cabin Type D 12 West: No new Cabins Total 24	<i>Allure Norfolk Bay</i> Master Plan vN

(excludes existing cabin B)

- Proposal reduced from 32 - 24 cabins
- Development consolidated into eastern cluster
- Western coastline remains unchanged
- Significantly smaller area of the site proposed for development