CENTRAL COAST COUNCIL
DEVELOPMENT & REGULATORY SERVICES
Received: 23 JUL 2019
Application No: .....
Doc. Id .....

20 July 2019

The General Manager
Central Coast Council
PO Box 220
ULVERSTONE TAS. 7315

I am the registered proprietor of the parcel of land reference Volume 229072 Folio 1 at Copper King Rd, Cuprona. This land is currently zoned "Vacant Residential"; under the Draft Central Coast Local Provisions Schedule it is shown as "Agricultural". I request that the Council change this zoning to "Rural".

At least in living memory, the land has never been used for agriculture. The land is entirely covered with native vegetation as can be seen in the attached satellite image (Attachment 1). All except a small portion is quite steep and impossible to use for cropping or even grazing. The only sustainable agriculture I can envisage is clearing the current vegetation followed by tree plantations.

This land adjoins other land proposed in the DCCLPS as "Rural" so changing the proposed zoning will not create an isolated zone.

Also attached is a more detailed report from Michael Tempest and Astrid Ketelaar, natural resource management consultants at AK Consultants, supporting my contention that "Agriculture" is not a suitable classification for the land in question.

This is a beautiful wooded property, a home for much Australian wildlife. I wish to preserve this.

Thomas C. Peachey
41 Valley Crescent, Glenroy Victoria 3046
Tel: 0449969238
email: tcp.free@gmail.com

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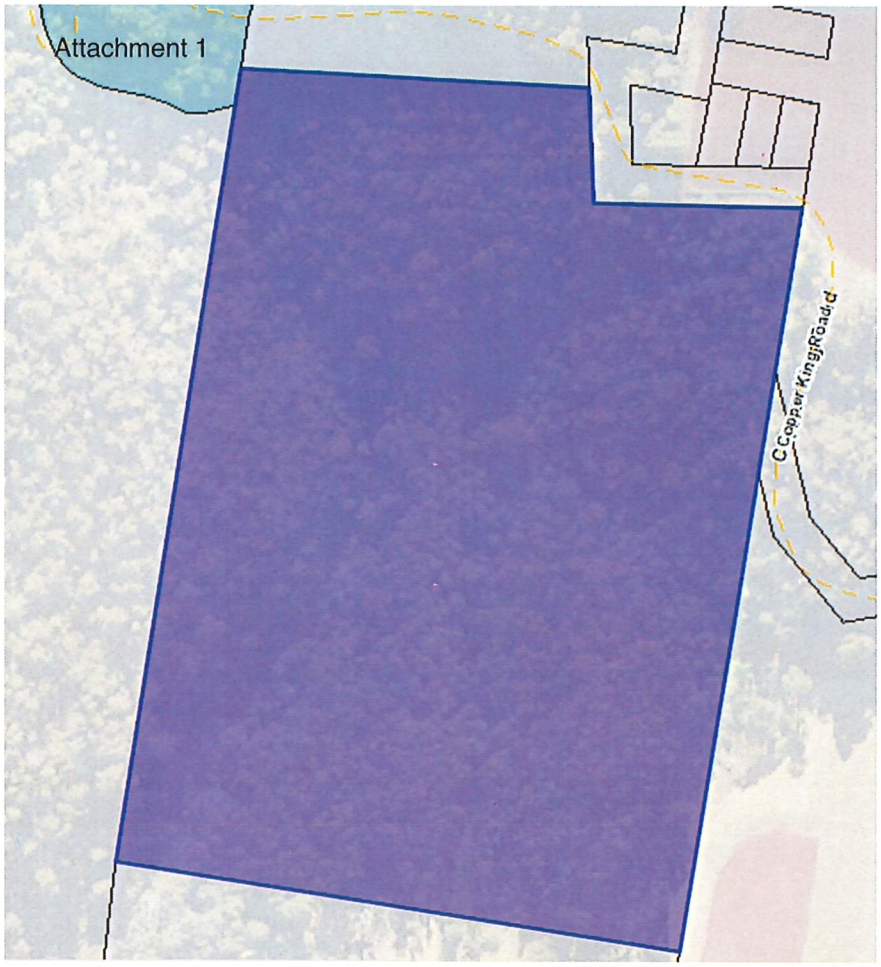
Attachment 1



Attachment 2

AK Consultants
AGRICULTURE &
NATURAL RESOURCE
MANAGEMENT

Mr Tom Peachey
41 Valley Rd
Glenroy, VIC 3046

19th July 2019

Dear Tom,

Proposed New Zoning of CT 229072/1 at Copper King Rd, Cuprona

under the Draft Central Coast Local Provision Schedule.

We have considered your land at Copper King Rd (CT 229072/1) against the *Application of Zones Guidelines* published by the State Government to assist Councils with delineating Planning Zones as part of their Local Provision Schedule (LPS) of the Tasmanian Planning Scheme. Under the Draft LPS for Central Coast Council your land is proposed to be zone 'Agriculture'. However, based on the characteristics of the land and its limited agricultural potential we are of the opinion that in this instance this proposed Zone is not suitable for the land; a more appropriate zone under the new Planning Scheme would be 'Rural'. We have detailed our reasoning below.

Currently, under the Central Coast Interim Planning Scheme the title is zoned 'Rural Resource'. One of the key changes between the Interim Planning Scheme and the New Planning Scheme is that the 'Rural Resource' Zone is being split into two new zones. The 'Agriculture' zone and the 'Rural' Zone. The purpose statements for each zone are:

Agriculture Zone:

- To provide for the use or development of land for agricultural use.
- To protect land for the use or development of agricultural use by minimising:
  a) Conflict with or interference from non-agricultural uses;
  b) Non-agricultural use or development that precludes the return of the land to agricultural use; and
  c) Use of land for non-agricultural use in irrigation districts.
- To provide for use or development that supports the use of the land for agricultural use.

Rural Zone:

- To provide for a range of use or development in a rural location:
  a) Where agricultural use is limited or marginal due to topographical, environmental or site or regional characteristics;
  b) That requires a rural location for operational reasons;
  c) Is compatible with agricultural use if occurring on agricultural land;
  d) Minimises adverse impacts on surrounding uses.

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- To minimise conversion of agricultural land for non-agricultural uses.
- To ensure that use or development is of a scale and intensity that is appropriate for a rural location and does not compromise the function of surrounding settlements.

To assist Councils with segregating the two new zones the Department of Justice completed the *Agricultural Land Mapping Project* (ALMP). This project essentially undertook a constraints analysis of the Tasmanian agricultural estate.

The constraints analysis that was utilised in the ALMP was not designed to provide a comprehensive analysis of all the factors that may contribute to the constraint of agricultural land, as it was perceived to not be feasible to develop a model at the state-wide scale that could incorporate all factors of each individual title that need to be considered. Instead it was based on a generic set of rules which provide Councils with a spatial layer to utilise, to identify areas for further investigation that could be potentially constrained.

The core output of the ALMP is the *Land Potentially Suitable for Agriculture* GIS Layer. This tool provides a constraints class for all titles that were deemed suitable to be included in the Agriculture Zone based on the assessment parameters developed in the ALMP. The constraints classes are listed in table 1.

Table 1. Constraints Classes of Land Potentially Suitable for Agriculture Layer (from ALMP 2016)

Constraints Class	Description of Titles
Unconstrained	• An area greater than an identified ag enterprise size threshold. • An area less than an identified ag enterprise threshold but adjoins another title with a greater than size and has a capital value of <$50,000/ha.
Potentially Constrained 2A	An area less than the identified ag enterprise thresholds A capital value of >$50,00/ha. Not adjoining a residential zone.
Potentially Constrained 2B	An area less than the identified ag enterprise thresholds. A capital value of <$50,000/ha. Does not adjoin a title with an area greater than identified ag enterprise thresholds.
Potentially Constrained 3	An area less than the identified ag enterprise thresholds. Adjoining a residential zone.

In the ALMP, five agricultural enterprise clusters were identified (Table 2). The clusters are based on Enterprise Suitability Mapping that has been developed by the State Government. For each enterprise cluster a minimum operating area was defined.

Table 2. Enterprise clusters and minimum title sizes (from ALMP 2016).

Cluster	Title Size	Access to Irrigation
ES1 – Irrigated Perennial Horticulture	10ha	Yes
ES2 – Vegetable Production	25ha	Yes
ES3 – Irrigated Grazing (Dairy)	40ha	Yes
ES4 – Broadacre – Cropping and Livestock	133ha	No
ES5 - Broadacre – Dryland Pastoral	333ha	No

For titles to be considered potentially suitable for ES1, ES2 or ES3 they also needed to have access to an irrigation supply. The ALMP developed a conservative method to determine if there was potential access to irrigation resources. A 3km buffer was provided for around existing water allocations, functional bores (flow rate >10l/sec) and major watercourses. The methodology also considered topography to determine if pumping would likely be economically viable. This conservative method has contributed to many titles being mapped as potentially suitable for ES1, ES2 or ES3, however, local scale assessment might determine that there is actually little to no potential for water resources, which could then impact on their potential for consideration for the Agricultural Zone.

In this instance, the analysis tool would have identified that the subject title was more than 1ha, adjacent to a title with agricultural characteristics that would meet at least one of the enterprise cluster characteristics and has a capital value of <$50,000 (because there is no existing dwelling). These characteristics would have resulted in the title being classified as 'unconstrained'.

However, this analysis does not specifically consider the individual characteristics of this title and how this limits its potential to be farmed in conjunction with the adjacent agricultural land. The subject title is approximately 11.4ha in area and is steeply sloped with a north westerly aspect. The south eastern corner sits at 220m above sea level (ASL), while the north western corner sits at 120m ASL.

There are four unnamed tributaries of the Blythe River located on the title, which converge in the north west of the title and flow north west to the Blythe River. The title is also entirely covered in native vegetation. TasVeg 3.0 maps the vegetation as 8.7ha of *Eucalyptus obliqua* dry forest (DOB), 1.5ha as Broad-leaf scrub (SBR), 1ha as *Eucalyptus obliqua* west forest (WOU) and 0.2ha as agricultural land (FAG). None of these vegetation communities are mapped as threatened communities under the *Nature Conservation Act 2002.* There are no records of any threatened flora or fauna species associated with the title (the LIST).

Published Land Capability at a scale of 1:100,000 maps the subject title as predominately Class 6 land (9.7ha), with the balance mapped as Class 4 land (1.7ha) (Moreton 1999). Class 6 land is defined on The LIST as; land that is marginally suitable for grazing due to severe limitations. While Class 4 land is described as land well suited to grazing, but which is limited to occasional cropping or a very restricted range of crops.

The adjacent agricultural land to the east where cropping occurs is mapped as Class 3 land. Class 3 Land is Prime Agricultural Land as defined under the Protection of Agricultural Land Policy 2009 (PAL Policy) and is suitable for intensive agricultural activities (cropping). Historic google imagery indicates that the adjacent Class 3 land is regularly utilised for cropping. Based on the poor Land Capability class of the majority of the subject title, compared to the good Land Capability Class of the adjacent agricultural land, it is our opinion that it is highly unlikely that the subject title would be farmed in conjunction with the adjacent agricultural land because the subject title would add no value to the type of agriculture that occurs on the adjacent land.

The title is within the Dial Blythe Irrigation District. However, the characteristics of the land indicate that the land is not suitable to be utilised for irrigation.

The adjacent land to the west is owned by Sustainable Timbers Tasmania and is proposed to be zoned 'Rural' in the new Planning Scheme.

The agricultural potential of the subject title is considered to be negligible and it is highly unlikely that this land would ever but utilised for an agricultural enterprise either on its own or in conjunction with adjacent land. Based on Zoned Application Guideline 1, 2, 3a & 3b of the Rural Zone this title is more suited to being zoned 'Rural' rather than 'Agriculture' under the new Planning Scheme. Furthermore, while the title is within an irrigation district, there is no potential to utilise the land for irrigation. With the adjacent land to the west destined for the 'Rural' zone, zoning the subject title 'Rural' as well will not result in spot zoning or zoning fragmentation.

Kind Regards,

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Natural Resource Management Consultant

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