
From: Roger Mulcahy [REDACTED] >
Sent: Sunday, 3 May 2026 1:01 PM
To: Kingborough LPS
Subject: Submission to TPC regarding [REDACTED] Bonnet Hill
Attachments: Submission to Tasmanian Planning Commission [REDACTED] Bonnet Hill.docx

Please see attached Word document, or as below:

3 May 2026

Roger Mulcahy
[REDACTED]
Kingston TAS 7051
Email: [REDACTED]

Submission to the Tasmanian Planning Commission

Re: Draft Kingborough Local Provisions Schedule – Zoning of [REDACTED], Bonnet Hill

I write to provide a submission regarding the proposed zoning of my property at [REDACTED] Bonnet Hill under the draft Kingborough Local Provisions Schedule (LPS).

Under the current planning framework, the property is zoned Environmental Living Zone (ELZ). I note that under the draft LPS, the property has been proposed to be rezoned to the Landscape Conservation Zone (LCZ). However, I strongly support the recommendation outlined in the *“Review of the LCZ – Kingborough Council”* prepared by Ireneinc, which proposes that the property instead be zoned Rural Living Zone (RLZ).

Background and history:

My wife and I purchased [REDACTED] in 1997.

The block was originally formed through subdivision of a farm, which had existed for generations.

Prior to 1991, the block of land had a house built at the North-Eastern border and a narrow strip of eucalypt trees (not virgin bushland) along the northern border of the block. The remainder (vast majority) of the block was a paddock (consisting of pasture-only) including a mix of exotic pasture plants and weeds, with a small number of stand-alone trees on the western part of the property consistent with longstanding, established/prior use for FARMING. In other words, the block has a long, established, prior history of significant alteration (and extinguishment) of any prior significant environmental/habitat values to make way for the use of farming, which was, in more recent history, followed by rural residential use.

The existing house was destroyed by bushfire in 1991 and we bought the vacant block in 1997. At that time, multiple seedlings of gum trees and she-oak trees were present in the western section of the block (likely germination of seed from just a very small number of the prior, scattered, trees) along with a HUGE number of environmental weeds (a virtual sea of sweet-briar and blackberry along with some Spanish heath, hawthorn and radiata pine). I have spent many hundreds of hours eradicating these weeds from that area (with ongoing surveillance and follow-up work required) and have allowed the eucalypt and she-oak trees to grow in that western strip of the property to act as a windbreak, with grass and she-oak needles being the only 'under-storey' being left, following removal of environmental weeds. This windbreak does have some limited natural and 'landscape' values (visual attractiveness and shelter for some animals) but: is not 'virgin' bush; and is botanically extremely lacking in biodiversity and habitat values (it is an 'oligo-culture' collection of young trees, with no old trees, no tree hollows and with virtually absent understorey). Apart from an additional narrow strip of bush along the northern aspect of the property (also of low environmental value due to past farming use) the remaining majority of the property remains pasture, with spaced 'garden' plantings (mostly exotic, low-flammability plants closer to the house) to manage the very-significant bushfire risk in this area, with our new house being placed in the centre of the 'paddock'.

I outline this history to emphasise that our block has a long-standing history of use and current use that is most consistent with being placed in the RLZ, not the LCZ, with the current 'bush' on the property being of low environmental/habitat value and only a recent arrival, having grown on pre-existing farmland pasture, and requiring ongoing work within it, to manage environmental weed issues and (within other regulations) bushfire risk.

1. Alignment with Existing Use and Development Pattern

The RLZ is the most appropriate zoning for the property when considering its existing and intended use. The property forms part of an established pattern of residential and semi-rural living development within the Bonnet Hill locality. The RLZ better reflects this existing settlement character, whereas the LCZ is generally intended for land with significantly higher conservation values and limited development potential.

Applying the LCZ would introduce a level of constraint that is inconsistent with the established and ongoing residential use of the land and surrounding properties.

2. Consistency with Surrounding Zoning and Land Use

The Ireneinc review identifies inconsistencies in the application of the LCZ across the municipality, particularly where land exhibits characteristics more consistent with rural-residential use rather than conservation priorities.

In the case of [REDACTED], the surrounding land use pattern, lot sizes, and level of development are more closely aligned with RLZ outcomes. Zoning the property LCZ would create an anomaly within the local context and undermine coherent planning outcomes.

3. Limited Conservation Justification for LCZ

The application of the LCZ should be based on clear and demonstrable landscape or environmental values that warrant a higher level of protection.

As noted in the Ireneinc report, a number of areas proposed for LCZ do not exhibit the level of constraint or conservation significance typically required to justify that zoning. In my view, this applies to my property. While the land has environmental values—as is common across much of Bonnet Hill—these are not of such significance that they necessitate the restrictive framework of the LCZ.

The RLZ is capable of accommodating environmental considerations through its provisions while still enabling reasonable use and development.

4. Appropriate Balance Between Use and Protection

The RLZ provides a more appropriate balance between enabling residential use and managing environmental values. It allows for development that is sensitive to the landscape without imposing the unnecessarily restrictive controls associated with the LCZ.

The LCZ, by contrast, would significantly limit the reasonable use and development of the property without requiring more complex (and potentially more prolonged and expensive) planning justification.

5. Support for Ireneinc Recommendations

I support the findings and recommendations of the Ireneinc review, which undertook a detailed and strategic assessment of the LCZ application across Kingborough. The recommendation to rezone properties such as mine to RLZ is logical, evidence-based, consistent with the history of our specific block and promotes a more consistent and appropriate planning framework.

Conclusion

For the reasons outlined above, I respectfully request that the Tasmanian Planning Commission adopt the recommendation of the Ireneinc report and rezone [REDACTED], Bonnet Hill to Rural Living Zone (RLZ) rather than Landscape Conservation Zone (LCZ).

This outcome would better reflect the existing and intended use of the land, ensure consistency with the surrounding area, and provide a more appropriate balance between development and environmental considerations.

Thank you for the opportunity to make this submission.

Yours sincerely,

Roger Mulcahy

3 May 2026

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