
From: Bylett, Annette L [REDACTED]
Sent: Monday, 4 May 2026 8:16 PM
To: Kingborough LPS
Subject: Annette Bylett - Submission for [REDACTED] -
Attachments: Report on proposed PTR at Snug Falls Rd; Submission 4 May 2026.pdf

You don't often get email from annette.bylett@health.tas.gov.au. [Learn why this is important](#)

Dear Tasmania Planning Commission

Please find attached my submission regarding the split zoning of my property from landscape conservation/rural to rural only.

Thank you for your time in considering my application, I look forward to hearing from you in due course.

Warm regards
Annette

[REDACTED]
Mobile [REDACTED]

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From: Bylett, Annette L [REDACTED]
Sent: Monday, 4 May 2026 7:39 PM
To: Bylett, Annette L (Health)
Subject: Report on proposed PTR at Snug Falls Rd

----- Original message -----

From: Amy Robertson [REDACTED]
Date: 4/5/26 7:09 pm (GMT+10:00)
To: "Annette L. Bylett" <[REDACTED]>
Subject: Report on proposed PTR at Snug Falls Rd

Hi Annette and family,

Thank you for seeking my advice as you continue to manage your forest and apply for a Private Timber Reserve (PTR) on your family's various properties in Snug. The draft report attached provides advice on your obligations in using your forest resources, based on a field visit I conducted on 3/5/26. Titles considered in this report include:

Title reference	Owner
232753/1	Annette Bylett
106760/1	Annette Bylett
245452/1	William Bylett
220339/1	William Bylett Michelle Bylett
185895/1	Andrew Bylett
175636/1	Andrew Bylett
244845/1	Andrew Bylett (not visited; update in final report)

The PTR would provide you with both benefits and obligations with regard to the conduct of forest operations (including establishment, growing, harvest of trees and related land clearing, burning, road construction or quarrying) within the PTR area.

Forest operations need to comply with both the local planning scheme and the state's forest practices system, and may on occasion need to respond to Commonwealth Environmental Protection and Biodiversity Conservation (EPBC) legislation. This report goes through these regulatory requirements and details some on-ground observations and their implications.

We discussed that continuing your small-scale firewood production of up to 100t per calendar year is likely to be a low cost but profitable endeavour for your property. Some of your regrowth trees are becoming big enough to produce sawlogs, but adding another couple of decades of growth will give you an excellent sawlog yield from this productive site, either via clearfell or patch-scale harvest of

the tall trees. Road access for a large-scale operation may be an issue, but there are ways of managing this where high quality product underpins the operation.

On the dry forest site with poorer timber quality, gradual production of a smaller yield of firewood would be considered sustainable with attention paid to ensuring regeneration and retaining hollow-bearing trees.

I also identified that establishing a blackwood plantation on the wetter ground around your top paddock spring could be a useful investment, with guidance available from PFT's Info Sheet series.

Kind regards,

Amy Robertson

Independent forester

BEnvSci, DipNRM, GAICD, MFA, FPO (Planning)

Phone [REDACTED] / Mailing PO Box 177 Geeveston TAS 7116

UN Intergovernmental Panel on Climate Change (IPCC): "a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks while producing timber, fibre, or energy, generates the largest sustained benefit to mitigate climate change."

Submission to the Tasmanian Planning Commission

Re: **Zoning of** [REDACTED]

Name: Annette Louisa Bylett – ABN 96 340 805 196

Date: 24th April 2026

Property Address [REDACTED], Snug, Tasmania, 7054

Titles 232753/1 and 106760/1

TPC Reference: DOC/26/36829

Exhibited Landscape Conservation

Ireneinc Report Split Zoned Landscape Conservation and Rural

Landowner Request Rural

Email: KingboroughLPS@planning.tas.gov.au



To the Tasmanian Planning Commission,

Thank you for the opportunity to provide a submission regarding the proposed zoning of my property at [REDACTED].

I formally object to the proposed Landscape Conservation Zone (LCZ) under the Kingborough Draft Local Provisions Schedule (LPS), and to the subsequent recommendation in the Ireneinc Report to split zone the property between Landscape Conservation and Rural. Applying LCZ/Rural is inconsistent with section 34 of the Land Use Planning and Approvals Act 1993 (LUPAA), the LPS Section 8A Guideline No. 1 and the Southern Tasmanian Regional Land Use Strategy (STRLUS).

I respectfully request that the Commission reject the proposed split zoning and instead apply a **Rural Zone to the entirety of the property.**

1. Historical Context and Continuity of Use

LUPAA guidelines state LCZ is not a replacement for ELZ. The priorities don't match: ELZ Living priority permits dwellings, but LCZ prioritises conservation with discretionary dwellings.

In correspondence with the Planning Authority, the TPC noted that the LCZ "appears to have been used ...to replace ELZ", a policy or strategy shift which should be 'comprehensively justified'. Neither the draft LPS nor Irene Inc's review has provided detailed, site-specific reasons for changing my land's priority. They based their decision on general landscape values and rural settlement judgments, neither had community input.

LCZ Guidelines 4(a) explicitly states that the LCZ should not be applied where the lands "priority is for residential use and development" Furthermore Section 12(1) of the LUPAA states "nothing in a provision of a planning scheme or of the Tasmanian Planning Scheme, in relation to a municipal area is to be taken (including by virtue of requiring a permit to be obtained) to

- (a) Prevent the continuance of the use, of any land.... For the purposes for which the land was being lawfully used immediately before the provision came into effect.

My family's connection to this land began in January 1901, when my great-grandparents were granted the land as free settlers. As skilled and diversified farmers, they subsequently purchased adjoining parcels and established a productive agricultural enterprise that included:

- **Small fruit production:** loganberries, raspberries, gooseberries supplied to the IXL Jam Factory and later Meredith's Orchards at Margate.
- **Timber production**, including:
 - Milling timber to produce apple boxes for Huon Valley.
 - Milling timber for residential housing.
 - Supplying timber to Australian Newsprint Mills (ANM) at Boyer over many decades.
- **Firewood production**, supplying households within the Channel and Kingborough areas, this continues to today.



- **Beef cattle production** for the Tasmanian market.



- **South African Boer goat production** – sold to Tasmanian Premium Goat Meats.



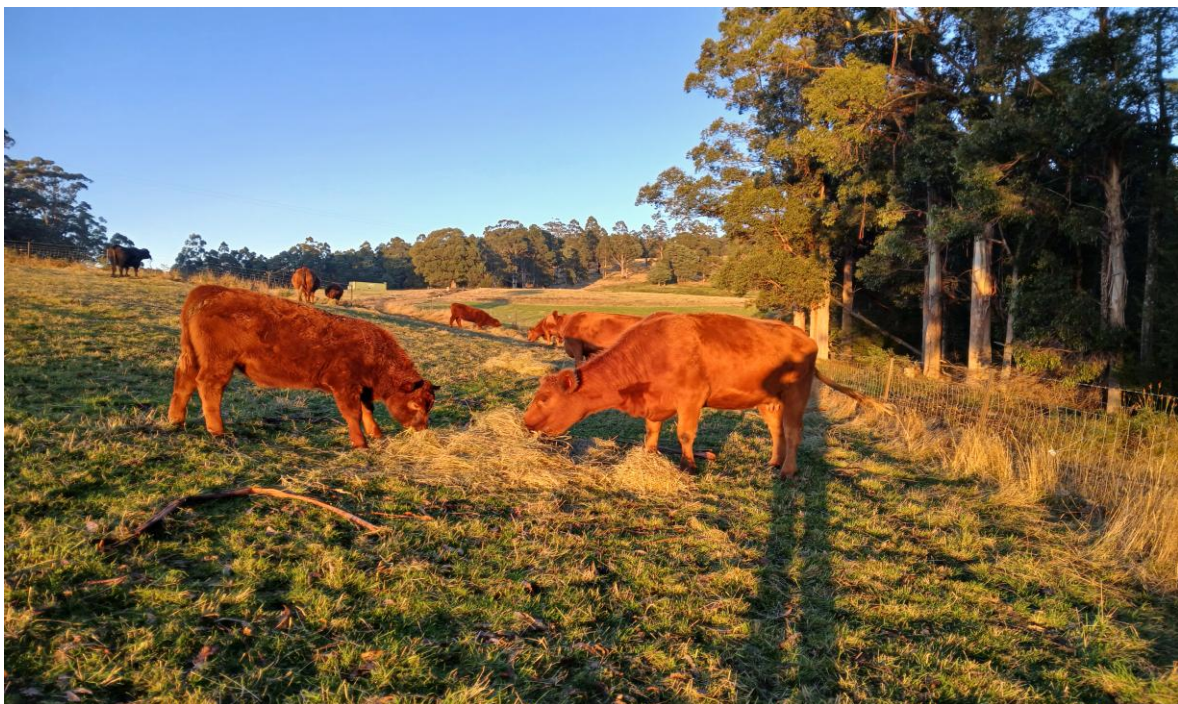
For over **125 years**, this property has contributed to Tasmania's food security, and for many decades the housing and publishing industries, with the supply of timber to ANM to create newsprint for the production of *The Mercury* newspaper.

Milling of timber ceased for household building materials due to the 1967 bushfires. Growing up and hearing about the fires, their ferocity, the speed at which they occurred and the devastation it left in its path, I am well aware of the need to ensure that the property is prepared in the event it occurs again. The grazing of stock within the bushland areas goes some way to reducing the fuel load on the ground.

Today, I continue this legacy as an active primary producer. The property, which spans more than 200 acres, is a working farm breeding Red Angus cattle and South African Boer goats. We produce approximately 1,200 bales of hay annually and maintain extensive agricultural infrastructure, including machinery sheds, livestock shelters, and significant water storage infrastructure to manage increasingly dry seasonal conditions.

The adjoining property to my right belongs to my brother William Bylett, the family farm was in-excess of 350 acres. On my father's passing my brother William inherited the adjoining property of more than 100 acres and runs cattle and produces hay. The property to the south of my block, is mixture of both pasture and bushland and is owned by my brother Andrew. Cattle and Goats are run on this land also.

- **Hay production** – property produces over 1,200 bales per year.





2. Forestry History and Future Sustainable Use

Commercial timber milling ceased following the 1967 bushfires, which destroyed existing milled timber and resulted in the loss of most of the standing timber across the property. We continue, however, to utilise timber for our own firewood needs and for sale. Trees are selectively removed, often due to age, structural failure, or storm damage.

In February 2027, it will be 60 years since the 1967 fires. Regrowth timber is now reaching a stage where selective milling may again be appropriate in the future. Any milling would involve carefully selected individual trees and sustainable practices. Preliminary assessments have already been undertaken, and we will be applying for a Private Timber Reserve to be applied to the property. Attached is the document that shows the properties suitability for a PTR, which shows the land's ongoing productive capability and potential contribution to Tasmania's housing needs.

3. Practical and Operational Objections to Split Zoning

The Irene Inc Report's recommendation to split zone the property appears to be derived from a **desktop-based analysis** that distinguishes between cleared pasture and forested areas. This approach does not reflect the operational reality of the farm.

- **Essential Livestock Shelter:** The forested areas are fenced and fully integrated into grazing rotations. They provide critical shelter for livestock, particularly newborn calves and goats, in an environment where snow can fall as late as November, in addition they provide shelter from the searing heat in the middle of summer.



- **Management Ambiguity:** Split zoning introduces uncertainty regarding boundaries on the ground, complicating compliance, long-term planning, and land management.
- **Fuel Load and Bushfire Management:** Grazing within bushland areas actively reduces understory fuel loads and mitigates bushfire risk. This outcome aligns with public safety objectives and is most effectively managed under a single **Rural Zone**.



4. Economic Impact and Insurance Concerns

The application of a zoning classification described as “Landscape Conservation” carries serious financial consequences. Insurance premiums for this property have more than doubled over the past four years, now consuming approximately 16% of my salary.

Advice from my insurance broker indicates that even partial LCZ designation will lead to:

- Further premium increases, or
- Refusal to renew coverage following a fire event.

As a primary producer who works off-farm to support the viability of the operation, these administrative and financial burdens place the farm’s future at risk.

5. Previous Zoning and Procedural History

Historically, the property was zoned Agricultural. We were unaware that it was later rezoned Environmental Living, a designation that was clearly inconsistent with the long-standing and ongoing agricultural use of the land. The appropriate zoning at that time should have been Rural.

Had the Rural Zone been applied, the property would not now be subject to Landscape Conservation zoning or split zoning considerations. This zoning change occurred without our awareness and has directly resulted in the current situation.

6. Desktop Assessment Versus On-Site Reality

I strongly believe that the current recommendations are the result of a desktop-only review that fails to capture:

- The property’s topography.
- The structural and operational use of the land
- The family’s management and deep connection to the land
- It’s 125-year history of primary production.

Existing environmental overlays already provide sufficient protection for natural values without the need for an additional and operationally restrictive Landscape Conservation Zone.

I respectfully invite the Commission to conduct an on-site inspection. I am confident such a visit will clearly demonstrate that **a Rural Zone across the entire property** is the most accurate, appropriate, and practical zoning outcome.

Recent photographs have been provided showing:

- Fenced bush areas providing livestock shelter.
 - Cattle feeding and grazing within forested areas.
 - Highly productive pasture for quality hay production.
 - Stock enjoying and enhancing the natural value of the land they help to maintain.
-

7. Rural and Rural Living Settlement

- Highlighted below in pink is my property, as you can see there are numerous houses in the area, these properties are generally smaller lot sizes, but they represent a rural living community. That is evidenced in the Snug Falls area, where rural living borders on the larger agricultural properties. The Snug Falls Community is a tight knit group that lives in a rural living settlement.



8. Personal and Family Impact

Since becoming aware of the proposed zoning changes approximately **nine months ago**, I have devoted extensive time to attending community and council meetings, researching planning instruments, and responding to consultation processes. The stress and anxiety caused by the proposed LCZ designation have been significant for myself and my family—particularly given our belief that the property should have remained Rural and never been rezoned Environmental Living.

Had the Rural Zone remained in place, this process—both emotionally and administratively—would have been entirely avoidable.

Conclusion

The application of applying LCZ to any part of my property directly conflicts with the overarching objectives of the LUPAA specifically Schedule 1, Objective (b), which aims for ‘fair, orderly, and sustainable’ land use.

For the reasons outlined above, I respectfully request that the Tasmanian Planning Commission:

1. Reject the proposed split zoning of [REDACTED]; and
2. **Apply a Rural Zone to the entirety of the property**, recognising its long-standing and continuing role as a productive agricultural enterprise and that the landscape values that LCZ is designed to protect can be managed effectively through the current overlays.

Thank you for your time and for considering the appropriate zoning of this 125-year-old family farm.

Yours sincerely,

Annette Bylett

