
From: Wynne Russell [REDACTED] >
Sent: Monday, 4 May 2026 11:01 PM
To: Kingborough LPS
Subject: Submission re Kingborough LPS Landscape Conservation Zone
Attachments: Wynne Russell [REDACTED] Margate independent submission 4 May 2026.docx;
Wynne Russell [REDACTED] Margate independent submission 4 May 2026
signature.png

To the Tasmanian Planning Commission,
Thank you for accepting my submission re the Kingborough Draft LPS/LCZ (appended and attached).
Kind regards,
Wynne Russell

Wynne Russell

[REDACTED], Margate TAS 7054

Tasmanian Planning Commission

Email: KingboroughLPS@planning.tas.gov.au

4 May 2026

Re: Tasmanian Planning Scheme Kingborough draft Local Provisions Schedule (LPS)

To the Tasmanian Planning Commission,

I write in response to the letter dated 2 April 2026 (ref: DOC/26/36829) advising that the Ireneinc report recommends my property remains within the Landscape Conservation Zone (LCZ) under the draft Kingborough Local Provisions Schedule (LPS).

I did not make a formal representation during the public exhibition period. However, I understand that this letter provides me the opportunity to formally participate in this stage of the LPS process by making a written submission. I understand that making a submission does not confer a right to be heard, but that the Commission may decide to invite me to discuss the matters raised.

I take up that opportunity and submit as follows.

Landowner name(s)	Wynne Russell
Property address	██████████ Margate TAS 7054
Title reference (folio)	██████████
Lot size (approx.)	13 hectares combined
Locality	Margate
Current IPS zone	Environmental Living Zone
Draft LPS exhibited zone	Landscape Conservation Zone (LCZ)
Ireneinc recommended zone	Landscape Conservation Zone (LCZ) -- unchanged
Zone sought in this submission	Rural Living Zone B

██████████ is a 12.8 hectare property located at 370 metres of altitude which, as part of a larger property that included what is now ██████████ has been used for agriculture since at least the 1950s. When I purchased it in 2007, a bit under 6 hectares was cleared land, having been used by a previous owner for blackberry farming and running a small herd of cattle. The remaining around 6 hectares are steeply sloping, running down into a gully; these appear to have been logged and permitted to regrow. For aerial photography extending from 1985 to 2004, showing the extent of the cleared area of the property, please see:

https://services.thelist.tas.gov.au/arcgis/rest/services/AerialPhotoViewer/Aerial_Photo_Coverage_Areas/MapServer/0/12245/attachments/11102

https://services.thelist.tas.gov.au/arcgis/rest/services/AerialPhotoViewer/Aerial_Photo_Coverage_Areas/MapServer/0/20479/attachments/19371

https://services.thelist.tas.gov.au/arcgis/rest/services/AerialPhotoViewer/Aerial_Photo_Coverage_Areas/MapServer/0/154988/attachments/159206

https://services.thelist.tas.gov.au/arcgis/rest/services/AerialPhotoViewer/Aerial_Photo_Coverage_Areas/MapServer/0/27694/attachments/28432

https://services.thelist.tas.gov.au/arcgis/rest/services/AerialPhotoViewer/Aerial_Photo_Coverage_Areas/MapServer/0/13915/attachments/12836

We consider ourselves to be highly committed to nature conservation. We are a registered Land for Wildlife property and have consistently worked to create habitat for mammals, birds, reptiles, amphibians, and invertebrates through active and passive regeneration, including through letting around 2 hectares of previously cleared land return to silver wattle and stringybark forest and through the planting of nearly 200 native and largely local species of trees and bushes. We further do not allow dogs or cats on the property. As a consequence, we have resident populations of Tasmanian devils, Eastern quolls, Eastern barred bandicoots, and bettongs, and are a UTAS DFTD vaccine research site. In short, we are already living the ideals of the LCZ, and we initially did not put in a submission because we fundamentally support efforts to guide Tasmanians to live in harmony with their natural surroundings and non-human neighbours.

Nevertheless, our property is also an area of human-focused activity. I have maintained a fenced area of approximately 1 hectare of land that was already cleared when I purchased the property -- the former cattle paddock, which is flat, north-facing, and has excellent drainage -- for our own gardening use, but also to preserve its potential for chemical-free, wildlife-friendly commercial agriculture: under conditions of climate change, high-rainfall, cool-climate land that is already cleared has the potential to act as valuable backup for crops that will increasingly struggle to cope with higher temperatures and lower rainfall on other properties. We have also maintained a suite of outbuildings that were in place with council approval when I purchased the property in 2006; these include a machinery shed/workshop, a small cottage that we use for guest space, and a small shed that we use as an art studio. These activities, and our agricultural pursuits, are captured well by the current zoning: Environmental Living, a title that captures both sides of the human/non-human coin.

Our growing concern over LCZ zoning stems from worries about the future, in particular in relation to the potential impacts of bushfire. We try to engage in good bushfire management and prevention activities, aided by the fact that our house sits in a cleared area of the property around 60 metres from the nearest large native trees. However, given our location, we have to assume that at some point the property will be impacted by fire, possibly to the point of losing our house or outbuildings. If this were to occur, we would assuredly prefer to rebuild in the cleared area former cattle paddock: the existing house site, which the owner-builders chose to maximise views, is problematic in terms of protection from fire, passive solar construction, and level access (increasingly important, as we hope to age in place). We also highly value all of our outbuildings; these not only are key to our current amenity, but also would be vital for anyone trying to establish commercial agricultural operations. However, from our reading of the LCZ, we have no guarantee that we would be able to rebuild other than on our current house site, or that we would be permitted to rebuild all of our outbuildings. Meanwhile, it is increasingly evident that if we chose to leave the property, an LCZ zoning would reduce our property's value, leaving

us at a grave disadvantage when we went to purchase a different dwelling. All of these points leave us anxious about our future.

These concerns coincide with genuine questions about the “landscape”-level conservation values of this property.

- From an aesthetic point of view, this property sits in a saddle, invisible other than from the road. Its paddocks, as noted above, have been cleared since at least the 1950s. The trees along [REDACTED] are not Tasmanian natives; they're eucalyptus nitens, a Victorian plantation gum. It's very lovely, but it's a rural, not a wild landscape, which points to the need for evidence-based reports or maps of individual properties' natural settings over desktop assessments.
- From a vegetation conservation point of view, this is a divided property: all the level land on the property already had been cleared before I purchased it, and the steep forested areas in the gully are poor candidates for any clearance. Both areas support the diversity of life that we enjoy, and indeed, if we were to let our paddocks grow over, we probably would lose some of our current biodiversity. We absolutely support what we assume is the intent of LCZ zoning to protect wooded areas; but we argue that the Natural Assets Code, the Scenic Protection Code, and biodiversity overlays, which apply to all zonings, are better ways of ensuring the conservation of vegetation than the segregation of properties into LCZ and non-LCZ, with the suggestion that the latter is somehow less worthy of conservation than the former.

For these reasons, I believe that the more appropriate zoning outcome for [REDACTED] is Rural Living B. This outcome would better reflect:

1. The property's long-established use for rural activities, which has gone on since at least the 1950s;
2. The existing planning character of the land under the Interim Scheme's Environmental Living framework;
3. The purpose of the Rural Living Zone to “provide for use and development that respects the natural landscape” in rural settings with limited services; and
4. Council's own acknowledgement that universal application of LCZ to a parcel is not always logical or appropriate, and that parts of the [REDACTED] locality warrant a non-LCZ alternative.

It is hard to believe that a rezoning process that has caused such much fear and distress can be considered to be a success – and indeed, I suspect that it will provoke a backlash that will do environmental conservation in Kingborough more damage than good. Kingborough Council's stillborn Bushland and Coastal Living Zone was a good initiative defeated by poor process; I hope that other compromises will succeed in the future.

In summary, I request that the Commission determine that the appropriate zone for [REDACTED] Margate under the draft Kingborough LPS is Rural Living Zone B. If the Commission proposes any alternative outcome, we request that we be provided with an opportunity to respond before any final determination is made.

Signed: Wynne E Russell Date: 4 May 2026

Wynne Russell (Dr/Ms)

ph: 61-[REDACTED] skype: [REDACTED]

<https://nightskythinking.com.au>

https://www.researchgate.net/profile/Wynne_Russell

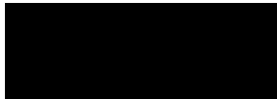
<https://www.linkedin.com/in/wynne-russell-00540632?trk=hp-identity-photo>

4. Council's own acknowledgement that universal application of LCZ to a parcel is not always logical or appropriate, and that parts of the Van Morey Road locality warrant a non-LCZ alternative.

It is hard to believe that a rezoning process that has caused such much fear and distress can be considered to be a success – and indeed, I suspect that it will provoke a backlash that will do environmental conservation in Kingborough more damage than good. Kingborough Council's stillborn Bushland and Coastal Living Zone was a good initiative defeated by poor process; I hope that other compromises will succeed in the future.

In summary, I request that the Commission determine that the appropriate zone for 751 Van Morey Rd, Margate under the draft Kingborough LPS is Rural Living Zone B. If the Commission proposes any alternative outcome, we request that we be provided with an opportunity to respond before any final determination is made.

Signed:



Date:

4/5/26