
From: Alison Graham <[REDACTED]>
Sent: Monday, 4 May 2026 4:24 PM
To: Kingborough LPS
Subject: Submission - Kingborough LPS Direction 69 - [REDACTED] Margate
Attachments: Submission RLZ [REDACTED] Margate.pdf;
Inconsistency_Analysis_Per_Locality.docx

Good Afternoon,

Please find a submission in relation to title [REDACTED] for [REDACTED] Margate.

Please acknowledge receipt of this email as I understand that the deadline for submissions is tonight.

With kind regards,

Alison Graham

WRITTEN SUBMISSION TO THE

TASMANIAN PLANNING COMMISSION

Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report

TEMPLATE T1

Contesting LCZ Retention

Seeking Rural Living Zone

⚠ DEADLINE: Submissions must be lodged by midnight Monday 4 May 2026. This deadline is hard and fast (Chair Nick Heath, TPC hearing Day 20). Late submissions cannot be accepted.

IMPORTANT DISCLAIMER: This template is provided for guidance only and represents personal interpretation of the TPC hearing and associated documents. It is NOT professional planning advice. Before lodging your submission you should read the source documents yourself, form your own view, and speak to a qualified planning professional or legal adviser about your specific circumstances. Do not rely on this template alone.

PART A — PROCEDURAL OPENING (select one variant)

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 the Commission has received correspondence from me or on my behalf in relation to the draft LPS. 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.

PART B — PROPERTY DETAILS

Landowner name(s)	Alison Graham
Property address	Margate
Title reference (folio)	Volume Folio
Lot size (approx.)	6.14 ha
Locality	Margate
Current IPS zone	Environmental Living Zone (ELZ)
Draft LPS exhibited zone	Landscape Conservation Zone (LCZ)
Ireneinc recommended zone	Landscape Conservation Zone (LCZ) — unchanged
Zone sought in this submission	Rural Living Zone (RLZ) — specify subcategory below

PART C — STATEMENT OF POSITION

I submit that the application of the Landscape Conservation Zone (LCZ) to my property is not consistent with the requirements of section 34 of the Land Use Planning and Approvals Act 1993 (LUPAA), the Section 8A Guideline No. 1 — Local Provisions Schedule: Zone and Code Application (the Zone Guidelines), or the Southern Tasmania Regional Land Use Strategy (STRLUS).

I request that the Commission determine that the Rural Living Zone (RLZ) is the appropriate zone for my property under the draft Kingborough LPS.

The specific subcategory I seek is:

- Rural Living Zone B (minimum lot size 5 ha) — reflecting the existing lot pattern in my locality

The predominant lot size in my area of Margate is approximately 2-10 ha and consistent with RLZ [3] where use is primarily residential with rural activities including hobby farming, and cultivating gardens including vegetable and fruit trees.

PART D — GROUNDS FOR THIS SUBMISSION

D1 — The LCZ does not comply with the Zone Guidelines (Guideline No. 1 / s.34 LUPAA)

The Commission is required by section 35L(2) of LUPAA to assess whether the LPS meets the LPS criteria, which includes compliance with the Zone Guidelines. The Commission confirmed at the Day 20 hearing that it will decide on the basis of the LPS criteria set out in section 34 of LUPAA and explicitly noted that Council's position — including its 16 March 2026 resolution favouring the 'least restrictive alternative' — is not binding on the Commission [Transcript, Day 20, 06:45:48]. I submit that the application of LCZ to my property does not comply with the Zone Guidelines as demonstrated below.

D1.1 — The Zone Guidelines prohibit LCZ where priority is residential (LCZ 4(a))

Zone Guideline LCZ 4(a) provides that the LCZ should NOT be applied to land where the priority is for residential use and development, instead indicating that the RLZ should be referred to. The Zone Guidelines further note explicitly that 'the LCZ is not a large lot residential zone, in areas characterised by native vegetation cover and other landscape values.'

My property has been used for residential purposes throughout the period it has been zoned Environmental Living Zone (ELZ) under the Kingborough Interim Planning Scheme 2015. During my tenure, the primary use and strategic intention of the land is and has always been residential.

My home was constructed in 1963 and has three bedrooms and two bathrooms. It has had some renovations including an extension and large decks added. There is also a two-storey shed, garden shed and car port on the property, although I do not know how long these have been there as I only purchased the property ten months ago. There are three stables which have been used for horses in the past. I am currently fixing fencing and have organised to get goats to house in the stables and adjacent cleared paddocks, of which there are three. There is a dam which provides a water source for animals and the gardens. I have also organised to get ducks and am completing a renovation of the existing duck pond. I have four chickens in the chicken shed that was existing and is linked to the enclosed orchard. I have a large, covered vegetable garden and berry patch which I have spent a great deal of time making productive in my short time at the property. There are many established trees including English Ash and Silver Birch as well as natives such as South Esk Pine. Kingborough Council does not provide services; however, I get monthly waste removal by a private collection service. This property is home to my family, including two dogs and is used for residential use only.

D1.2 — The LCZ is not a replacement zone for the ELZ (Zone Guidelines note)

The Zone Guidelines state expressly: 'The LCZ is not a replacement zone for the ELZ in interim planning schemes. There are key policy differences between the two zones.' The TPC itself noted this in its post-lodgement correspondence with Council, observing that the LCZ 'appears to have been used quite extensively to replace the ELZ' and that 'application of the LCZ could signify a shift in council policy or strategy, which generally ought to be comprehensively justified.'

No such comprehensive, site-specific justification has been provided for my property. The Ireneinc report applies the LCZ to my property on the basis of generalised locality-level landscape values, not on the basis of demonstrated landscape values specific to my title.

The Ireneinc Locality Report for Margate does not identify any specific landscape values on my title and instead relying on the locality level. There is bush on my property, and I am happy for this to remain and enjoy the peace that it offers. However, this bush is only a part of my property and the primary purpose is rural living to provide a home for my family and animals. A 4WD track runs the entire length of the property for access and to a further cleared area at the Western side of the property.

D1.3 — The RLZ is the appropriate zone under the Zone Guidelines (RLZ 1 and RLZ 2(b))

Zone Guideline RLZ 1(a) provides that the RLZ should be applied to residential areas with larger lots where the existing and intended use is a mix between residential and lower order rural activities, with priority given to the protection of residential amenity. This description accurately characterises my property.

Zone Guideline RLZ 2(b) further provides that the RLZ may be applied to land within the ELZ in an interim planning scheme where the primary strategic intention is for residential use and development within a rural setting and a similar minimum allowable lot size is being applied. My property satisfies both elements of this criterion.

My property has an area of 6.14 ha and is consistent with the RLZ [B] minimum lot size of 5 ha and does not provide for further subdivision under that subcategory.

D2 — The Ireneinc evaluation framework, applied correctly to my property, supports RLZ

The Ireneinc report applies an evaluation pathway (decision tree) to determine the appropriate zone. The Commission was told at Day 20 of the hearing that this framework is not a statutory instrument — it is a tool, not a rule [Kate Heckelmann, Transcript Day 20, 05:53:00]. Representations can depart from it with good evidence. However, I submit that even applying the framework as intended, my property satisfies the criteria for RLZ rather than LCZ.

D2.1 — My property has a strategic residential intention

The first decision point in the Ireneinc evaluation pathway asks whether there is a strategic intention for residential use. The report identifies visual evidence of existing residential use and known strategic intention as the relevant indicators. My property clearly satisfies this criterion.

I have included photos to demonstrate the established residential use of my property.



Front of house looking north



Side of house looking east - can see established silver birches and pines.



Rear of house looking east.



Shed and car port



Looking east
– can see
garden &
large shed



Evidence of 4WD tracks over property



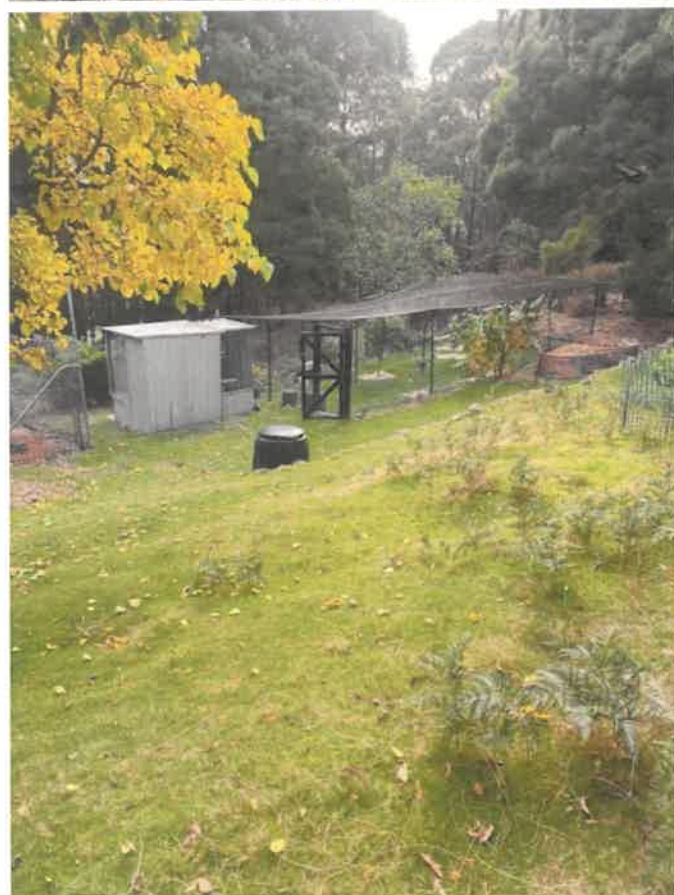
Inside one of the stables



Three stables and one of the paddocks



Looking east from garden to another paddock with orchard



Looking at chook shed and orchard – covered berry patch corner at far left of photo



Free-ranging chickens



Covered vegetable garden to left



Duck pond under renovation beside covered berry patch



One of the
3 paddocks



Dam



Cleared area at western end of property

D2.2 — My property has the characteristics of a rural living settlement

The Ireneinc framework identifies rural living settlement characteristics as: at least 10 smaller blocks generally ranging in size between 1–15 ha with a consistent lot pattern; a consistent pattern of detached dwellings with associated outbuildings; and visual evidence of rural activities (cleared areas, hobby farming, grazing etc.). The Ireneinc report's own locality baseline confirms that the broader settlement in which my property sits displays these characteristics.

As I have lived on [REDACTED] Margate for only a short period, I cannot provide much history of the development of this area. However, from my observations, the use of my land is consistent with other neighbouring residential properties in the area with hobby farms, chickens, sheep, alpacas, cattle, goats, sheds and dams.

D2.3 — The identified landscape values can be managed outside of LCZ

The Ireneinc evaluation framework requires consideration of whether identified landscape values can be appropriately managed outside of LCZ, specifically through the Natural Assets Code (NAC), the Scenic Protection Code (SPC), or a Specific Area Plan (SAP). The Commission itself accepted this argument in relation to Kettering West at Day 20, where the panel effectively found that the Priority Vegetation Area (PVA) overlay does the landscape-protection work, not the zone [Transcript, Day 20, 02:33:54].

My property is not within a Scenic Protection Area (SPA). It is not subject to the NAC / PVA overlay. These overlay controls provide adequate management of any landscape values present, without the need for the more restrictive LCZ.

My property is a mix of cleared land, residential buildings and bush. It is consistent in historical and ongoing rural living. It is not on the Van Morey ridge and should not be considered the same as those properties.

D2.4 — The RLZ subcategory provides for limited or no further subdivision

The Ireneinc framework identifies as a key RLZ suitability indicator that the transition 'would result in limited/no further subdivision' and that 'a similar minimum allowable lot size is being applied.' Applying RLZ [C] to my property achieves this outcome, as the minimum lot size under that subcategory is consistent with the existing lot size and does not create a viable subdivision pathway.

My property has an area of 6.14 ha. Under RLZ [D], the minimum lot size is 10 ha (with an 8 ha performance criteria). Subdivision of my property under this subcategory would not be possible, addressing any concern about intensification.

D3 — The TPC panel's own statements support RLZ for properties like mine

The following exchanges from the Day 19 and Day 20 TPC hearings directly support the argument that the RLZ is more appropriate than the LCZ for my property. These statements were made by TPC Commissioners and are on the public record.

D3.1 — The evaluation framework is not a statutory instrument

Kate Heckelmann (Ireneinc) conceded at Day 20 [05:53:00] that the evaluation framework is not a statutory instrument — it is a tool, not a rule. The Commission is not bound by its application in any individual case and must assess my property against the statutory criteria in section 34 of LUPAA and the Zone Guidelines.

D3.2 — Risk ratings are judgement calls, not defined thresholds

At Day 20, the low/medium/high risk ratings applied by Ireneinc to LCZ recommendations were described as judgement calls, not defined thresholds. Ireneinc's position was that these ratings are a rule of thumb only [Day 20 guide]. The Commission has not yet determined what weight to give these ratings. Where the risk rating applied to my locality is medium or high, this is not a determinative finding — it is an assessment that can be challenged with site-specific evidence.

My property is not on the elevated Van Morey Road ridge and does not have the high-risk rating of that area and should not be disadvantaged by this.

D3.3 — Visible rural activity is not required for RLZ

The TPC panel confirmed at Day 20 that visible rural activity is not a prerequisite for RLZ. This was applied consistently across multiple localities including Howden, Albion Heights, and Kingston West [Day 20 guide]. Properties need not demonstrate active farming or grazing to satisfy the RLZ criteria — residential use in a rural setting is sufficient.

D3.4 — Analogy to accepted RLZ localities

The Ireneinc report recommended full ELZ to RLZ transitions for a number of localities, including Kettering East and Oyster Cove, Howden and Blackmans Bay, Albion Heights, and Tinderbox West. No questions were asked about these recommendations at the hearing, though this does not indicate acceptance by the Commission. The characteristics of those localities — established residential settlement, lots generally between 1 and 15 ha, mixed residential and rural activities, limited evidence of significant landscape values requiring LCZ protection — are shared by my property.

My property in Margate is directly comparable to properties in areas such as Oyster Cove where RLZ was recommended. These areas are similar with lots ranging 1-10 ha, mixed residential and rural activities and no significant landscape value. There is no principled basis on which to treat my property differently.

D4 — Consistency and fragmentation arguments

D4.1 — Fragmented LCZ application should be resolved in favour of the surrounding zone

The Ireneinc report itself identifies avoidance of fragmented LCZ application as a key principle. The report notes that areas where only 2–3 LCZ-zoned properties are surrounded by Rural Zone (RZ) or RLZ land should be modified to resolve the fragmentation. Where my property is located within or adjacent to an area predominantly zoned RLZ or RZ, the application of LCZ creates exactly the kind of spot-zoning that the Ireneinc framework seeks to avoid.

My home is close to and within a kilometre of numerous properties with RLZ [A & B] to the north and east under the draft LPS. The application of LCZ to my property in a small cluster of similar properties creates a fragmented pocket of LCZ and inconsistent approach within a predominantly residential area with rural activities. I note that 170 and 125 Old Bernies Road are proposed for RLZ [B] and are sized 16.87 ha and 8.45 ha respectively, which are both larger than my property.

D4.2 — Inconsistency with adjoining or comparable properties

The Zone Guidelines require that the spatial application of zones be, as far as practicable, consistent with and coordinated across the LPS. Where neighbouring properties with substantially similar characteristics have been recommended for RLZ, the application of LCZ to my property is inconsistent and not supported by evidence of any material difference.

The property opposite me at [REDACTED] is proposed for RLZ [B]. This lot is larger than mine with 16.76 ha in size. Otherwise, the property at [REDACTED] also has a house, large shed, dam, cleared land with goats and bush. The fencing is poor at my neighbour's property, and their goats frequently come onto my property. There is no identified difference in landscape values or development history that would justify the different treatment of my property.

D5 — Council's approach has been historically inconsistent

The Ireneinc LCZ Review report documents a significant evolution — and inconsistency — in Council's approach to the application of the LCZ to ELZ land. At the time the draft LPS was first submitted to the TPC in 2020, approximately 85% of ELZ parcels were proposed for LCZ. The TPC noted that this approach was often inconsistent with the Zone Guidelines and that 'often when assessing particular sites, the zone proposed does not seem to match these criteria or those of Guideline No.1.' By the time of public exhibition the proportion had been reduced to approximately 75%, with the balance transitioning to RLZ, RZ, and other zones.

This history demonstrates that the initial presumption in favour of LCZ was not well-founded and that the LCZ application has been progressively narrowed as the evidence base has been tested. The Ireneinc report represents a further iteration of this process, but where the evidence specific to my property supports RLZ, the LCZ recommendation should not be allowed to stand.

D6 — Any landscape values present can be managed without LCZ

Where landscape values are present on or near my property, I submit that they can be appropriately managed through the application of the relevant overlay controls, without the need for LCZ. The TPC panel acknowledged on Day 20 [02:33:54] that the PVA overlay and SPC do the landscape-protection work in many cases, removing the justification for LCZ in those areas.

Ireneinc itself acknowledged in the LCZ Review report that a future rural living settlement review may reconsider current RLZ decisions, and that any short-term risk is 'not something that's a definitive or a risk that can't be mitigated with future action' [Transcript, 03:06:18]. This acknowledgement of residual risk mitigation further supports the appropriateness of RLZ rather than LCZ for my property.

My property has proposed Code Overlays including Priority Vegetation and Scenic Protection Areas which regulate any development. The combined effect of the RLZ zoning and these overlay controls is sufficient to manage any landscaped values identified in the locality baseline without resorting to LCZ.

D7 — Inconsistency in the Ireneinc evaluation framework (Attachment A)

A formal inconsistency analysis has been prepared and is attached to this submission as Attachment A. That analysis compares the landscape value descriptions, settlement characteristics, lot sizes, SPA coverage, PVA/NAC overlay coverage, and risk ratings applied by Ireneinc to this locality against one or more similar localities that received a more favourable zone outcome using the same or near-identical evidence.

The analysis draws on the following key statements from the Day 20 TPC hearing:

- Commissioner Rohan Probert [01:07:48]: Directly identified that landscape descriptions for Tinderbox East and Howden are near-identical yet produced opposite zone outcomes, asking Ireneinc to identify the actual difference between those two. This principle applies to the inconsistency documented in Attachment A for this locality.
- Commissioner Dan Ford [02:33:54]: Forced the concession that the PVA overlay does the landscape-protection work, not the zone. This principle applies where PVA overlay is present on my property.
- Kate Heckelmann (Ireneinc) [05:53:00]: The evaluation framework is a tool, not a statutory instrument. Submissions can depart from it with good evidence.

As documented in Attachment A – Margate & Electrona [Channel Region] section, the comparison with Oyster Cove shows that Ireneinc applied near-identical landscape value descriptions and settlement findings to both localities yet recommended LCA for my property and RLZ for similar properties in the Oyster Cove area. The primary differentiation appears to be the Scenic Protection Area which is specific to the Van Morey Road area which is not applicable to my property.

I request that the Commission have regard to Attachment A in assessing this submission, and in particular to the specific comparison rows identified above, which demonstrate that the Ireneinc recommendation for this locality is inconsistent with the outcome produced by the same evaluation framework applied to comparable localities elsewhere in the municipality.

PART E — LOCALITY-SPECIFIC CONTEXT

The Kingborough Council is a large area, and it is understandable that my property has been misunderstood in the zoning process. My home has been used for residential and hobby farming for decades and continues to this day. I hope that with my description and photos, it can be seen that my property is clearly used for rural living. It is unfair to zone my property differently to nearby properties that are similar in size and used for the same purposes. I can understand that Van Morey Road is in the Margate area and is different due to the significant landscape protection area of that ridge, but this does not characterise my property. My property has no views and not close to Van Morey Road ridge. With the proposed Code Overlays in place, this should be enough to provide protection from a zoning perspective, for example, no ability to subdivide. I moved into my home only ten months ago and feel dismayed that my privilege for rural living may be removed. I am hopeful that you are able to view my property in light of this information.

PART F — CONCLUSION AND RELIEF SOUGHT

For the reasons set out above, I submit that:

1. The application of the LCZ to my property is inconsistent with the Zone Guidelines (Guideline No. 1) and does not satisfy the requirements of section 34 of LUPAA.
2. The LCZ is prohibited by Zone Guideline LCZ 4(a) where, as here, the priority of the land is residential use.
3. The Rural Living Zone satisfies the criteria in Zone Guidelines RLZ 1(a) and RLZ 2(b) and is the appropriate zone for my property.
4. Any landscape values identified in the locality can be appropriately managed through existing overlay controls without resort to LCZ.

I respectfully request that the Commission:

- Determine that the draft Kingborough LPS should be modified to include my property within the Rural Living Zone [B].
- If the Commission proposes any alternative outcome, that I be provided with an opportunity to respond before any final determination is made.

I request that the folio of the Register [REDACTED] at [REDACTED] Margate, be included within the Rural Living Zone [B] in the Kingborough Local Provisions Schedule.

Signature: [REDACTED]

Date: 04/05/2026

Alison Graham

Full name:

Contact email / phone: [REDACTED]

PART G — ACRONYMS / TERMS USED IN THIS SUBMISSION

Acronym/Term	Meaning
ELZ	Environmental Living Zone
Ireneinc report	Review of the LCZ Kingborough (Review of the Methodology and Zone Application and Locality Baseline and Alternative Zone Evaluation)
LCZ	Landscape Conservation Zone
LPS	Draft Kingborough Local Provisions Schedule
LUPAA	Land Use Planning and Approvals Act 1993
NAC	Natural Assets Code
PVA	Priority Vegetation Area
RLZ	Rural Living Zone
SAP	Specific Area Plan
SPA	Scenic Protection Area
SPC	Scenic Protection Code
STRLUS	Southern Tasmania Regional Land Use Strategy
TPC	Tasmanian Planning Commission
Zone Guidelines	Guideline No. 1 — Local Provisions Schedule: Zone and Code Application

KINGBOROUGH LPS — IRENEINC ZONE REVIEW

Why Your Property Fits Rural Living Zone — 20 Locality Comparisons

⚠ **DEADLINE: All submissions must be lodged by midnight Monday 4 May 2026. This document supports your submission — it does not replace the submission templates or professional planning advice.**

PURPOSE: This document is structured into 20 sections — one for each mainland Kingborough locality. Each section contains a side-by-side comparison table showing how your locality was described and assessed by the consultant (Ireneinc) against a similar locality that was recommended for Rural Living Zone using the same types of descriptions and evidence. The goal is to help you show the Commission why your property should be in Rural Living Zone, by pointing to similar properties that were recommended for exactly that.

IMPORTANT NOTE ABOUT THE HEARING: The Day 19 and Day 20 hearings in April 2026 were for the Ireneinc report to be presented to the Tasmanian Planning Commission (TPC). During the hearing, TPC delegates asked questions about some recommendations. Where delegates did not ask questions about a particular area, this does not mean they agreed with the recommendation — in a long hearing covering 20 localities, time constraints meant many points were not questioned on the day. The recommendations in the Ireneinc report are not final decisions. The Commission will make its own decision based on all submissions and the statutory criteria in the Zone Guidelines. Your submission is your opportunity to put forward evidence about your specific property.

HOW TO USE THIS DOCUMENT: (1) Find the section for your locality. (2) Look at the comparison table — the left column shows how your locality was described; the right column shows how a similar locality was described when it was recommended for Rural Living Zone. (3) Note where the descriptions are the same or very similar. (4) Read the 'What this means for your submission' paragraph at the bottom of each section. (5) Use those points in Part D and Part E of your submission template, and attach the relevant locality section as Attachment A.

GLOSSARY — TERMS AND ABBREVIATIONS USED IN THIS DOCUMENT	
Term	What it means
LPS	Local Provisions Schedule
TPC	Tasmanian Planning Commission — the independent body that reviews and approves the LPS. They hold public hearings and make the final decision on zone allocations.
Ireneinc	The planning consultancy (Ireneinc Planning and Urban Design) engaged by Kingborough Council to review the zone recommendations. Their report was presented to the TPC at the April 2026 hearings.
ELZ	Environmental Living Zone — the zone that most of the affected properties are in under the current (interim) planning scheme. This zone is being phased out and must be replaced with a new zone under the LPS.
LCZ	Landscape Conservation Zone. A zone that prioritises protecting landscape values such as native bushland, scenic views, and native vegetation.
RLZ	Rural Living Zone. Allows residential use (a home and associated rural activities like hobby farming) on larger lots in a rural setting. It has four categories — A, B, C and D — based on minimum lot size. This is the zone most similar to how properties in the Environmental Living Zone have been used.
RZ	Rural Zone. A zone for rural land where agricultural use is limited. It allows a range of rural activities but treats residential use as discretionary. It is less restrictive than LCZ but does not give residential use the same priority as Rural Living Zone.
EMZ	Environmental Management Zone.
SPA	Scenic Protection Area. A mapped overlay that applies to land with important scenic values — usually elevated or visually prominent land. Where this overlay applies, extra rules control building height and design to protect scenic views. Ireneinc used the presence or absence of this overlay as one reason for recommending LCZ or Rural Living Zone in some localities.
PVA	Priority Vegetation Area. A mapped overlay that identifies land containing important native vegetation — for example, threatened plant species or significant habitats. The Natural Assets Code (see below) applies to land within this overlay and limits how much vegetation can be cleared.
NAC	Natural Assets Code. A state-wide planning code that controls clearing of native vegetation within Priority Vegetation Areas and protects waterways and coastal areas. It applies regardless of what zone the land is in.
DP6 (Decision Point 6)	Step 6 in the assessment process (decision tree) that Ireneinc used to evaluate each locality. This step asks: 'Could the landscape values be protected if Rural Living Zone was applied, using the NAC, SPA, and other existing planning rules?' A 'yes' answer at this step supports Rural Living Zone. A 'no' answer supports LCZ.
UGB	Urban Growth Boundary. A boundary that separates urban areas (where growth is planned) from rural areas. Land inside the UGB is expected to develop at higher densities over time. The state planning strategy does not support Landscape Conservation Zone inside the Urban Growth Boundary.
STRLUS	Southern Tasmania Regional Land Use Strategy — the state government's planning strategy for the Southern region. It sets out policies for where growth should and should not occur. Zone recommendations in the LPS must be consistent with this strategy.
KIPS / Interim Planning Scheme	Kingborough Interim Planning Scheme 2015 — the current planning rules that apply until the new LPS comes into effect. Most affected properties are currently zoned Environmental Living (ELZ) under the KIPS.
LUPAA	Land Use Planning and Approvals Act 1993 — the Tasmanian law that governs planning schemes and the role of the TPC. Section 34 of this Act sets out the legal tests the TPC must apply when deciding whether the LPS is correct.
Zone Guidelines / Guideline No. 1	A document issued by the TPC that sets out the rules for which zone should be applied to which type of land. It is the main reference document for zone decisions in the LPS process. It includes specific rules for LCZ (rules LCZ 1–4) and Rural Living Zone (rules RLZ 1–4) that must be followed.
Risk rating (low / medium / high)	A judgement made by Ireneinc at Decision Point 6 about how likely it is that landscape values would be harmed if Rural Living Zone was applied instead of LCZ. TPC delegates confirmed at the hearing that these ratings are judgement calls — they are not defined legal thresholds. A medium or high risk rating does not automatically mean LCZ is required.

REGION 1 — KINGBOROUGH BUSHLAND SURROUNDS

1. Kingston & Kingston Beach [Kingston & Bushland Surrounds]

Ireneinc outcome: LCZ retained. Ireneinc recommendation at Day 20: but explicitly flagged as out of place — LCZ inside the Urban Growth Boundary is inconsistent with STRLUS [04:17:00–04:25:00].

Characteristic	Kingston & Kingston Beach — Outcome: LCZ retained	Albion Heights & Bonnet Hill — Outcome: Full RLZ
Ireneinc landscape value description	Residential on large bushland lots (1–6 ha); surrounded by urban residential; inside Urban Growth Boundary; Boronia Hill parkland connection	Elevated bushland; vegetated ridgeline landscape; dwellings nestled into vegetation; scenic backdrop to Channel; similar native vegetation character
Settlement characteristics found	Yes — consistent residential pattern on larger lots; recognisable subdivision pattern	Yes — rural living settlement; lots 2–25 ha; dispersed but recognisable settlement pattern between higher-intensity residential
Lot sizes	1–6 ha	2–25 ha (majority 2–5 ha)
SPA coverage	Partial	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high	Medium
DP6 — codes manage landscape values?	Not explicitly tested — LCZ retained on exhibited position	YES — 'sufficient mechanisms in the planning scheme to provide for appropriate management of landscape values'
Key differentiator cited	Located inside UGB; LCZ accepted as out of place for this process only	Located between higher-intensity residential uses; codes sufficient; min lot size prevents subdivision
Zone Guidelines basis	LCZ flagged as STRLUS-inconsistent by TPC — no positive Zone Guidelines basis explained	RLZ 1(a), 2(b); RLZ min lot size provides no further subdivision

Zone outcome for Kingston & Kingston Beach	Landscape Conservation Zone	⚠ INCONSISTENCY: The Landscape Conservation Zone was recommended despite the TPC explicitly acknowledging it is STRLUS-inconsistent. Albion Heights, with similar or more significant landscape values, was recommended for full Rural Living Zone. The UGB location is the only distinguishing factor cited — but this is a planning strategy consideration, not a Zone Guidelines criterion for LCZ.
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What this means for your submission: The TPC's own acknowledgement that LCZ inside the UGB is a STRLUS an inconsistency undermines the LCZ justification. If your lot does not contribute to the Boronia Hill bushland corridor and has cleared or developed character, argue that LCZ 1 threshold is not met on your individual title, drawing on the Albion Heights precedent where comparable vegetation and residential character produced RLZ.

2. Albion Heights & Bonnet Hill [Kingston & Bushland Surrounds]

Ireneinc outcome: Full ELZ → RLZ. Presented at the hearing [04:29:00–04:38:00]. Bonnet Hill LDRZ pocket outside UGB contested separately.

Characteristic	Albion Heights & Bonnet Hill — Outcome: Full RLZ	Kingston West (upper blocks) — Outcome: LCZ retained
Ireneinc landscape value description	Elevated bushland; distinctive ridgeline landscape; vegetated; dwellings on expansive parcels; scenic backdrop	Elevated bushland on upper blocks; similar ridgeline character; dwellings within vegetated setting — near-identical language to Albion Heights
Settlement characteristics found	Yes — semi-rural residential character; lots 2–25 ha; dwellings on expansive parcels	Yes — western residential cluster; upper blocks have larger lots with residences
Lot sizes	2–25 ha (majority 2–5 ha)	Variable; upper blocks >5 ha; western cluster 1–5 ha
SPA coverage	Partial	Partial (similar extent)
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium — Ireneinc recommended Rural Living Zone	Medium — used to justify LCZ for upper blocks
DP6 — codes manage landscape values?	YES — codes and min lot size manage values adequately	Partially — Ireneinc found increased building height from RLZ could become more visually prominent on upper blocks
Key differentiator cited	Located between higher-intensity residential zones; codes sufficient	Elevation and visual prominence of upper blocks — but same features are present in Albion Heights
Zone Guidelines basis	RLZ 1(a), 2(b) applied	LCZ 1 applied to upper blocks — but no more significant landscape value than Albion Heights
Zone outcome for Albion Heights & Bonnet Hill	Full RLZ — consistent	⚠ INCONSISTENCY: Ireneinc recommended full Rural Living Zone for this locality — it is an similar locality for LCZ-retained properties in Kingston West with similar elevation and vegetation character. The same medium risk rating that produced RLZ here was used to retain LCZ in the upper Kingston West blocks, despite near-identical landscape value descriptions.

Submission argument (for Kingston West properties referencing Albion Heights): Ireneinc's own finding here — that landscape values at this elevation are manageable by scheme codes and a min lot size that prevents subdivision — applies equally to upper Kingston West blocks. Cite the identical risk rating and near-identical landscape value language as evidence of inconsistency.

3. Taroona & Kingston North [Kingston & Bushland Surrounds]

Ireneinc outcome: LCZ retained for majority; small group of western parcels noted as potentially suitable for Rural Zone. Ireneinc recommendation at Day 20: at medium-to-high risk.

Characteristic	Taroona & Kingston North — Outcome: LCZ retained	Howden & Blackmans Bay — Outcome: Full RLZ
Ireneinc landscape value description	Elevated bushland; ridgeline character; scenic values; coastal interface on eastern parcels; connection to Hobart City Council boundary	Native bushland; towering Eucalyptus; distinctive vegetated ridgeline; residential settlement pattern follows topography; dwellings screened by vegetation; scenic views
Settlement characteristics found	Yes — residential uses occurring; interface with urban areas; western parcels have rural farming activities	Yes — rural living settlement; lots 1–5 ha; located between urban settlements at Blackmans Bay and Howden
Lot sizes	Variable — mix of larger and smaller lots near Channel Highway	1–5 ha (majority); two larger parcels ~10–16 ha
SPA coverage	Significant	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-to-high	Medium
DP6 — codes manage landscape values?	Not clearly concluded — Ireneinc noted alignment with Hobart City Council LCZ across boundary as additional factor	YES — codes and min lot size manage values; 'low risk where RLZ is applied'
Key differentiator cited	Alignment with Hobart City Council LCZ across municipal boundary; eastern parcels have significant values	Residential settlement pattern predominates; codes sufficient; existing blocks already fully used
Zone Guidelines basis	LCZ 1/2(c) — but cross-boundary alignment is not a Zone Guidelines criterion	RLZ 1(a), 2(b)

Zone outcome for Taroona & Kingston North	LCZ retained	⚠ INCONSISTENCY: Ireneinc used alignment with Hobart City Council's LCZ across the municipal boundary as a supporting reason for LCZ here. This is not a criterion under the Zone Guidelines (Guideline No. 1). Howden & Blackmans Bay, with similar or less significant landscape values and partial SPA coverage, was recommended for full Rural Living Zone at medium risk. Ireneinc also acknowledged that western rural-use parcels in Taroona could be Rural Zone — suggesting the LCZ boundary was drawn more broadly than the evidence supports.
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What this means for your submission: Cross-boundary consistency with Hobart's LCZ is not a basis for LCZ under Zone Guidelines LCZ 1 or 2. The Zone Guidelines require site-specific landscape value justification. Cite Howden as similar — similar elevation, vegetation, and coastal setting produced RLZ at the same partial SPA coverage. For western rural-use parcels, Ireneinc's own concession that Rural Zone may be appropriate supports a T2 submission.

4. Kingston West [Kingston & Bushland Surrounds]

Ireneinc outcome: Mixed — LCZ for elevated upper blocks; RLZ for western residential cluster; extra western parcels added to RLZ. Ireneinc recommendation at Day 20: with case-by-case flexibility; Chair Heath noted small cleared residential lots inside LCZ can still be argued out [05:50:30].

Characteristic	Kingston West (LCZ upper blocks) — LCZ retained	Albion Heights & Bonnet Hill — Full RLZ	Howden & Blackmans Bay — Full RLZ
Ireneinc landscape value description	Elevated bushland; ridgeline; scenic backdrop — near-identical language to Albion Heights and Howden	Elevated bushland; vegetated ridgeline; dwellings nestled in vegetation; scenic backdrop	Vegetated ridgeline; residential settlement follows topography; native bushland; scenic views to/from properties
Settlement characteristics found	Yes — upper blocks have residential uses but less consistent pattern than western cluster	Yes — semi-rural residential; lots 2–25 ha; between higher-intensity zones	Yes — lots 1–5 ha; consistent pattern; between Blackmans Bay and Howden urban areas
Lot sizes	Upper blocks >5 ha; western cluster 1–5 ha	2–25 ha	1–5 ha
SPA coverage	Partial	Partial	Partial
PVA / NAC overlay	Yes	Yes	Yes
Risk rating applied	Medium (upper = LCZ)	Medium (→ RLZ)	Medium (→ RLZ)
DP6 — codes manage landscape values?	Ireneinc said codes were not enough — cited elevation and building height risk	YES — codes and min lot size adequate	YES — codes and min lot size adequate; 'low risk'
Key differentiator cited	Elevation/prominence of upper blocks; building height difference between RLZ and LCZ	Located between higher-intensity residential zones	Settlement pattern clear; existing blocks already fully used

Zone outcome for Kingston West (upper LCZ blocks)	LCZ retained	⚠ INCONSISTENCY: The same medium risk rating and near-identical landscape value descriptions produced RLZ in Albion Heights and Howden but LCZ in Kingston West upper blocks. The sole cited difference is the height allowance differential between RLZ and LCZ on elevated blocks — but Albion Heights and Howden are equally elevated and was recommended for Rural Living Zone. Delegate Ford directly challenged this distinction at Day 2 [01:07:00–01:08:25], noting the landscape descriptions are 'very similar' and asking what the actual difference is between localities where codes can and cannot manage.
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What this means for your submission: Chair Heath at [05:50:30] explicitly noted that small cleared residential lots inside Kingston West LCZ can be argued out through representations. Cite Albion Heights and Howden as directly similar — identical risk rating, identical or greater elevation, nearly identical landscape value language — yet full RLZ resulted. The building height differential alone is not a sufficient basis for LCZ where codes, NAC, and PVA overlay provide equivalent protection.

5. Neika [Kingston & Bushland Surrounds]

Ireneinc outcome: LCZ for majority; 2 Huon Road parcels → RLZ; split-zone approach for 540 Leslie Road (cleared portion → RLZ). Ireneinc recommendation at Day 20: with case-by-case flexibility.

Characteristic	Neika (LCZ majority) — Outcome: LCZ retained	Neika (Huon Road parcels) — Outcome: RLZ
Ireneinc landscape value description	Significant bushland and elevated landscape across most of locality; scenic values; similar vegetation character throughout	Same locality — landscape values present throughout; no meaningful difference in landscape character between LCZ and RLZ areas identified
Settlement characteristics found	Present across much of locality — residential uses with varying lot sizes	Yes — Huon Road lots show rural living pattern consistent with adjoining RLZ to south
Lot sizes	Variable — many >10 ha in LCZ portion	Similar to LCZ portions but positioned adjacent to existing RLZ
SPA coverage	Partial across locality	Partial — same as LCZ area
PVA / NAC overlay	Yes throughout	Yes — same as LCZ area
Risk rating applied	Medium-high (LCZ)	Lower — consistency with adjoining RLZ cited
DP6 — codes manage landscape values?	Ireneinc did not apply this reasoning to the LCZ majority	YES — characteristics consistent with existing RLZ to south; 'could be reasonably managed in the same way'
Key differentiator cited	Lot sizes >10 ha (too large for RLZ without subdivision risk) for some parcels; insufficient consistency in settlement pattern	Proximity and consistency with adjoining RLZ parcels — same reasoning, same landscape values

Zone outcome for Neika (LCZ majority)	LCZ retained	⚠ INCONSISTENCY: Ireneinc applied RLZ to specific Huon Road parcels because of consistency with adjoining RLZ — using the same landscape value and code management reasoning it declined to apply to the LCZ majority. The proximity to adjoining RLZ argument applies equally to other Neika lots that adjoin or are near existing RLZ. For large lots (>10 ha), Ireneinc's concern about subdivision potential is addressed by applying RLZ D (minimum 10 ha) — a solution Ireneinc accepted at 540 Leslie Road.
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What this means for your submission: If your Neika property adjoins or is in close proximity to existing RLZ or to the Huon Road RLZ parcels, argue consistency — the same reasoning Ireneinc applied to grant RLZ on Huon Road applies to your lot. For large lots, show that RLZ D (minimum 10 ha) eliminates subdivision potential, directly addressing the risk Ireneinc cited for LCZ retention.

6. Leslie Vale [Kingston & Bushland Surrounds]

Ireneinc outcome: Exhibited RLZ + LCZ mix retained as appropriate; no recommended changes. Ireneinc recommendation at Day 20:. Note: 540 Leslie Road split-zone (RLZ for cleared portion, LCZ for vegetated balance) was flagged but accepted.

Characteristic	Leslie Vale (LCZ portions) — Outcome: LCZ retained	Leslie Vale (RLZ portions) — Outcome: RLZ retained
Ireneinc landscape value description	Native vegetation; scenic values; 540 Leslie Road specifically: >20 ha, extensive vegetation connecting to EMZ to northeast	Similar native vegetation and scenic character — landscape descriptions are consistent across the locality; no meaningful difference in vegetation type identified
Settlement characteristics found	Present across LCZ portions — residential uses occurring	Yes — clear residential and rural living settlement pattern in RLZ portions
Lot sizes	LCZ lots range from smaller to very large (540 Leslie Road >20 ha)	Generally smaller to medium lots in RLZ portions
SPA coverage	Partial across locality	Partial — similar coverage
PVA / NAC overlay	Yes	Yes
Risk rating applied	Not re-assessed — exhibited position retained	Not re-assessed — exhibited position retained
DP6 — codes manage landscape values?	Not re-evaluated — existing LCZ carried forward without new analysis	Existing RLZ carried forward as appropriate — codes managing values
Key differentiator cited	540 Leslie Road: lot size >20 ha; extensive vegetation; EMZ connection. Other LCZ lots: no specific new differentiator identified	Existing RLZ already established; settlement pattern consistent with rural living

Zone outcome for Leslie Vale (LCZ portions)	LCZ retained	⚠ INCONSISTENCY: Ireneinc did not re-evaluate the Leslie Vale LCZ or RLZ designations — it simply accepted the exhibited position. Where a LCZ lot does NOT share the characteristics of 540 Leslie Road (lot size >20 ha, extensive native vegetation, EMZ connection), the specific LCZ justification for that lot is absent from the Ireneinc report. Lots that share characteristics with the existing RLZ portions have no documented basis for different treatment.
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What this means for your submission: If your Leslie Vale LCZ lot is smaller than 20 ha and does not share the specific characteristics of 540 Leslie Road (extensive vegetation, EMZ connection), the LCZ justification in the Ireneinc report does not apply to your title. Argue that your lot's characteristics match the existing RLZ properties in the locality, and that Ireneinc's failure to re-evaluate the LCZ designation means the exhibited LCZ was not positively confirmed by the review process.

7. Allens Rivulet [Kingston & Bushland Surrounds]

Ireneinc outcome: Mixed — RLZ (Mountain Road / Allens Rivulet Road parcels); Rural Zone (red group with rural activities); LCZ balance. Ireneinc recommendation at Day 20:.

Characteristic	Allens Rivulet (LCZ balance) — Outcome: LCZ retained	Allens Rivulet (RLZ parcels — Mountain Rd) — Outcome: RLZ
Ireneinc landscape value description	Bushland; native vegetation; similar landscape character throughout locality — no meaningful difference in landscape value description between LCZ and RLZ parcels in the locality report	Same locality — landscape values present throughout; the RLZ recommendation was based on settlement pattern consistency, not absence of landscape values
Settlement characteristics found	Present — residential uses in LCZ portions	Yes — Mountain Road / Allens Rivulet Road parcels show rural living settlement characteristics consistent with adjoining RLZ
Lot sizes	Variable in LCZ portions	Similar — consistent with adjoining RLZ lot sizes
SPA coverage	Partial throughout locality	Partial — same as LCZ areas
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium for LCZ	Lower — consistency with adjoining RLZ
DP6 — codes manage landscape values?	Not explicitly concluded as YES for LCZ balance	YES — 'could be reasonably managed in the same way' as adjoining RLZ
Key differentiator cited for RLZ	—	Consistency with and proximity to adjoining RLZ parcels — characteristics match

Zone outcome for Allens Rivulet (LCZ balance)	LCZ retained	⚠ INCONSISTENCY: Ireneinc granted RLZ to specific parcels on consistency with adjoining RLZ — using the same landscape and code management reasoning it declined to apply to the LCZ balance. If a LCZ lot is adjacent to or near the Mountain Road / Allens Rivulet Road RLZ cluster and shares similar characteristics, the consistency argument applies equally. The Ireneinc report does not identify any meaningful difference in landscape values between the RLZ and LCZ sub-areas of this locality.
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What this means for your submission: If your Allens Rivulet LCZ lot is adjacent to or shares characteristics with the Mountain Road / Allens Rivulet Road RLZ parcels, argue consistency — the same basis Ireneinc used to grant RLZ to those parcels applies to yours. For rural-activity-dominant lots, cite the Rural Zone group as similar and use T2 template.

8. Sandfly & Kaoota [Kingston & Bushland Surrounds]

Ireneinc outcome: Mixed — RLZ (Pregnall's Road / Talbots Road residential cluster); Rural Zone (Halls Track / Pioneer / Huon / Thompson Roads); LCZ balance. Ireneinc recommendation at Day 20:.

Characteristic	Sandfly & Kaoota (LCZ balance) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Elevated bushland; scenic values; mix of cleared and vegetated parcels; similar to Channel Region descriptions. Pregnall's / Talbots cluster: 'elevated bushland interspersed with cleared areas; rural activities contribute to overall landscape values'	Rural living characteristics; scenic landscape; interface between coastline and bushland; dwellings integrated into natural setting — near-identical language to Sandfly cluster areas
Settlement characteristics found	Yes — Pregnall's / Talbots cluster: clear rural living settlement pattern. LCZ balance: less consistent pattern in some areas	Yes — consistent rural living settlement throughout; lots 1–10 ha along Manuka Road; pattern clear and recognisable
Lot sizes	Pregnall's / Talbots: 2–8 ha. LCZ balance: variable, some larger	1–10 ha (majority 2–7 ha)
SPA coverage	Partial	Partial — comparable extent
PVA / NAC overlay	Yes throughout	Yes
Risk rating applied	Low-medium for RLZ cluster; medium-high for LCZ balance	Medium — accepted for full locality
DP6 — codes manage landscape values?	YES for RLZ cluster: PVA and SPA manage values; 'low to medium risk'	YES — codes and min lot size manage values; full RLZ accepted
Key differentiator cited	LCZ balance: more fragmented settlement; some larger lots outside cluster pattern	Clear settlement pattern throughout; existing blocks already fully used; codes adequate
Zone outcome for Sandfly & Kaoota (LCZ balance)	LCZ retained	⚠ INCONSISTENCY: Kettering East was recommended for full Rural Living Zone at medium risk with landscape value descriptions and settlement patterns nearly identical to the Sandfly/Kaoota Pregnall's cluster — and with comparable characteristics to many LCZ-balance lots. Ireneinc's own Sandfly assessment found codes manage landscape values in the RLZ cluster; the same conclusion was not applied to the LCZ balance without clear additional justification.

What this means for your submission: If your Sandfly / Kaoota LCZ lot shares characteristics with the Pregnall's / Talbots RLZ cluster (lot 2–8 ha, residential settlement character), cite the cluster RLZ as directly similar. For the broader LCZ balance, cite Kettering East where nearly identical characteristics — including medium risk — produced full RLZ across the entire locality.

9. Longley & Lower Longley [Kingston & Bushland Surrounds]

Ireneinc outcome: Exhibited zoning generally retained; part of 137 Anderson Road → Rural Zone; Krauses Road and Huon/Andersons Roads → Rural Zone (TPC modifications). Ireneinc recommendation at Day 20:.

Characteristic	Longley & Lower Longley (LCZ) — Outcome: LCZ retained	Longley & Lower Longley (Rural Zone parcels) — Outcome: Rural Zone
Ireneinc landscape value description	Elevated landscape; bushland; hinterland character across the locality — consistent descriptions throughout; no meaningful difference in landscape value language between LCZ and Rural Zone areas in the locality	Same locality — Rural Zone parcels at Krauses Road, Huon Road, and Andersons Road have similar landscape setting; the Rural Zone recommendation was based on existing rural activities, not absence of landscape values
Settlement characteristics found	Present — residential and rural uses throughout	Yes — existing rural farming and grazing activities on specific parcels
Lot sizes	Variable in LCZ portions	Larger rural parcels at Krauses Road, Andersons Road
SPA coverage	Partial	Partial — similar extent
PVA / NAC overlay	Yes	Yes
Risk rating applied	Not explicitly re-assessed — exhibited LCZ retained	Not rated separately — Rural Zone applied on existing-use basis
DP6 — codes manage landscape values?	Not explicitly re-evaluated for LCZ balance	Implicitly YES — Rural Zone applied because existing rural activities dominate; codes manage any residual landscape values
Key differentiator cited	Exhibited LCZ accepted without re-evaluation	Existing rural activities (grazing, farming) on specific parcels; consistent with Rural Zone purpose

Zone outcome for Longley & Lower Longley (LCZ)	LCZ retained	⚠ INCONSISTENCY: Ireneinc did not re-evaluate the LCZ designation for the balance of Longley and Lower Longley — it simply accepted the exhibited position. Rural Zone was applied to specific parcels with existing rural activities. Where a LCZ lot also has existing rural activities, the same Rural Zone reasoning applies. Where a LCZ lot has residential character similar to the existing RLZ land in the municipality, the Sandfly and Kettering East precedents support an RLZ argument.
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What this means for your submission: For Longley LCZ lots with existing rural activities, cite the Anderson Road / Krauses Road Rural Zone precedent and use T2 template. For residential-character lots, the Ireneinc report did not positively confirm the LCZ through re-evaluation — argue this gap, and cite Sandfly Pregnall's cluster or Kettering East as similar localities where comparable characteristics produced RLZ.

REGION 2 — CHANNEL REGION

10. Tinderbox [Channel Region]

Ireneinc outcome: West side → full RLZ. East side → LCZ retained. TPC Day 20: East — 'locality where TPC delegates asked the most questions about the LCZ justification' [00:35:10–00:47:04]. Delegate Probert at [01:06:52–01:08:25] directly stated the landscape descriptions are near-identical and the only difference is the risk profile — which Ireneinc was then challenged to explain.

Characteristic	Tinderbox East — LCZ retained	Tinderbox West — Full RLZ	Howden & Blackmans Bay — Full RLZ
Ireneinc landscape value description	'Elevated bushland... vegetated ridgeline... dwellings nestled into vegetation... scenic backdrop... residential settlement pattern closely follows natural topography' — IDENTICAL language to west side	Identical landscape value language — same peninsula, same vegetation type, same topographic character, same coastal setting	'Distinctive vegetated ridgeline landscape characterised by residential settlement pattern... native bushland present throughout... dwellings often screened by retained vegetation' — same language, different locality
Settlement characteristics found	Yes — residential settlement along Tinderbox Road; lots 1–10 ha; dwellings with outbuildings; recognisable pattern	Identical — same road, same peninsula, same settlement type	Yes — lots 1–5 ha; consistent pattern; framed by reserves to north and south
Lot sizes	1–10 ha (with 2 large northeastern lots noted as outliers)	1–10 ha	1–5 ha (majority)
SPA coverage	NO — absent on eastern coast	YES — Scenic Protection Area covers western peninsula	Partial — not full SPA coverage
PVA / NAC overlay	Yes	Yes	Yes
Risk rating applied	Medium-high → LCZ	Low-medium → RLZ	Medium → RLZ
DP6 — codes manage landscape values?	NO — 'potential for increased height associated with extensions or new builds to become more visible'; SPA absent means no code control on height	YES — SPA provides height control; 'low risk where RLZ is applied'	YES — 'codes and min lot size manage values; low risk'; SPA only partially present — same as east Tinderbox in areas
Key differentiator cited	Absent SPA on east coast; higher building height allowance in RLZ vs LCZ; two large northeastern lots reduce settlement consistency	SPA present; western development less visually prominent from water	Residential settlement character predominates; codes sufficient
TPC challenge	Delegate Ford [00:35:14]: 'Specifically, what cannot be managed through those codes?' Delegate Probert [01:07:48]: 'One we say they can be managed and the other one we say they can't — what we really need to say is the difference between those two'	Recommended by Ireneinc without challenge	Recommended by Ireneinc without challenge

Zone outcome for Tinderbox East	LCZ retained	⚠ INCONSISTENCY: This is the starkest inconsistency in the entire Ireneinc report. Delegate Probert's own words from the hearing [01:07:48] confirm it: identical landscape value descriptions, identical settlement characteristics, and both sides of the same peninsula — but opposite zone outcomes. The sole cited differentiator is the absence of SPA on the eastern coast. However Howden & Blackmans Bay, which has PARTIAL SPA coverage (not full), also was recommended for Rural Living Zone at medium risk. The SPA-absence argument is not applied consistently.
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Submission argument — Tinderbox East properties: Cite Delegate Probert's own statement from [01:07:48] verbatim — 'one we say they can be managed and the other one we say they can't be managed... what we really need to say is the difference between those two.' Then show that Howden was recommended for Rural Living Zone at partial SPA coverage, and Kettering West Groombridges was recommended for Rural Living Zone after TPC delegates identified an issue and the concession that PVA overlay does the landscape-protection work [02:33:54]. If PVA applies to your east Tinderbox lot, argue the SPA-absence rationale is overcome by PVA coverage.

11. Howden & Blackmans Bay [Channel Region]

Ireneinc outcome: Full ELZ → RLZ. Ireneinc recommendation at Day 20: without challenge [00:59:00–01:03:00]. This is the primary RLZ precedent for the Channel Region.

Characteristic	Howden & Blackmans Bay — Outcome: Full Rural Living Zone — best comparison for your area	Tinderbox East — Outcome: LCZ retained
Ireneinc landscape value description	'Native bushland, towering Eucalyptus trees; distinctive vegetated ridgeline landscape characterised by residential settlement pattern; dwellings often screened by retained vegetation; elevated topography provides scenic views'	Near-identical language: elevated bushland; vegetated ridgeline; dwellings nested in vegetation; scenic backdrop — Delegate Probert confirmed descriptions are 'very similar' [01:07:21]
Settlement characteristics found	Yes — lots 1–5 ha; consistent pattern; located between Blackmans Bay and Howden settlements	Yes — residential settlement along Tinderbox Road; lots 1–10 ha; same peninsula structure
Lot sizes	1–5 ha (majority); 2 parcels ~10–16 ha	1–10 ha; 2 large northeastern lots noted
SPA coverage	Partial — not full coverage	NO SPA on east coast
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium — Ireneinc recommended Rural Living Zone	Medium-high — used to justify LCZ
DP6 — codes manage landscape values?	YES — 'sufficient mechanisms in the planning scheme... low risk where RLZ is applied'	NO — 'increased height could become more visibly prominent; SPA absent'
Key differentiator	None explained — landscape descriptions are near-identical; Howden simply described as having 'more prevalence of residential feel' [Transcript 01:11:56]	Two large northeastern lots reduce settlement consistency; SPA absent
TPC challenge	Recommended by Ireneinc without challenge	Delegate Ford: 'Specifically what cannot be managed through those codes?' — direct challenge to the LCZ justification
Zone outcome for Howden & Blackmans Bay	Full RLZ — consistent	⚠ INCONSISTENCY: This locality is the most useful comparison for the Channel Region. Its consistent use as an similar comparison in submissions is supported by Delegate Ford's Day 20 challenge to the Tinderbox East LCZ justification and Delegate Probert's explicit statement that the landscape descriptions are near-identical. Howden was recommended for Rural Living Zone with partial SPA coverage — the same coverage level cited as insufficient in Tinderbox East.

Submission argument (for any Channel region LCZ locality): Cite Howden as the primary similar locality. The landscape value language, settlement characteristics, lot sizes, partial SPA coverage, and risk profile are comparable to many LCZ-retained localities in the Channel Region. Use Ireneinc's own Howden reasoning — 'sufficient mechanisms in the planning scheme to provide for appropriate management' — and argue it applies equally to your property.

12. Margate & Electrona [Channel Region]

Ireneinc outcome: Mixed — Rural Zone (cleared rural parcels); RLZ (residential cluster); LCZ (Van Morey Road elevated/SPA-covered); EMZ (reserve). Ireneinc recommendation at Day 20: [01:29:00–01:34:00].

Characteristic	Margate & Electrona (LCZ — Van Morey Road) — Outcome: LCZ retained	Margate & Electrona (RLZ cluster) — Outcome: RLZ
Ireneinc landscape value description	Van Morey Road: 'significant natural landscape values and scenic landscape values'; elevated; SPA-covered; prominent views from Channel	RLZ cluster: 'landscape values consistent with that anticipated in a rural living settlement; contributing to overall scenic character' — landscape values PRESENT but found manageable
Settlement characteristics found	Limited — Van Morey Road has fewer residential lots; not a clear rural living settlement pattern	Yes — recognisable rural residential subdivision pattern; lots 2–7 ha; residential uses and rural activities
Lot sizes	Larger lots on Van Morey Road; less consistent pattern	2–7 ha — consistent with RLZ C
SPA coverage	YES — significant SPA coverage on Van Morey Road elevated area	Partial — same general area
PVA / NAC overlay	Yes	Yes
Risk rating applied	High (Van Morey elevated block)	Low-medium
DP6 — codes manage landscape values?	NO — SPA coverage does not negate the elevated prominence and visual significance at this specific location	YES — codes and min lot size manage values; consistent with adjoining RLZ land
Key differentiator cited	Elevation, SPA coverage, visual prominence from Channel; no clear rural living settlement pattern	Settlement pattern consistent with rural living; existing blocks already fully used

Zone outcome for Margate & Electrona (Van Morey LCZ)	LCZ retained	⚠ INCONSISTENCY: The Van Morey Road LCZ is the most defensible LCZ retention in Margate — it has strong SPA coverage, high elevation, and high visual prominence from the Channel. However, properties in the Margate LCZ area that do NOT share these specific characteristics (elevated, SPA-covered, Channel-prominent) have no documented basis for LCZ over RLZ. Many Margate properties with similar characteristics to the RLZ cluster were LCZ in the exhibited scheme and remain LCZ in Ireneinc — argue site-specific differentiation from the Van Morey characteristics.
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What this means for your submission: If your Margate property is not on the elevated Van Morey Road ridge and does not have the specific Channel-prominence cited for LCZ, argue differentiation. The RLZ cluster in the same locality was recommended for Rural Living Zone because codes manage landscape values and the settlement pattern is consistent with rural living. If your lot shares those characteristics, cite the within-locality RLZ as the directly relevant precedent.

13. Coningham & Snug [Channel Region]

Ireneinc outcome: Mixed — RLZ (Snug Tiers Road cluster); Rural Zone (Old Station Road / PPZ footprint); LCZ balance; 4 coastal parcels not decided. Ireneinc recommendation at Day 20: [01:56:00–02:03:30].

Characteristic	Coningham & Snug (LCZ balance) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Coastal views; native vegetation; D'Entrecasteaux Channel setting; coastal bushland — near-identical language to Kettering East. 'Landscape values consistent with a rural living settlement within the region, contributing to overall scenic character and coastal rural landscapes'	'Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting; interface between coastline and bushland contributing to significant landscape value'
Settlement characteristics found	LCZ balance: less consistent settlement than Snug Tiers Road cluster; variable lot sizes	Yes — consistent rural living settlement throughout; lots 1–10 ha along Manuka Road
Lot sizes	Variable in LCZ balance; some larger lots	1–10 ha
SPA coverage	Significant for some coastal LCZ lots	Partial — comparable or lesser coverage
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high for LCZ balance	Medium — Ireneinc recommended full Rural Living Zone
DP6 — codes manage landscape values?	NOT explicitly concluded as YES for LCZ balance	YES — full locality; codes and min lot size manage values
Key differentiator cited	More variable settlement pattern in LCZ areas; coastal interface complexity; 4 parcels parked	Clear consistent settlement pattern; existing blocks already fully used throughout
Zone outcome for Coningham & Snug (LCZ balance)	LCZ retained	⚠ INCONSISTENCY: Kettering East was recommended for full Rural Living Zone at medium risk with a D'Entrecasteaux Channel coastal setting described in near-identical terms to the Coningham/Snug LCZ balance. The coastal setting alone did not prevent RLZ at Kettering East. The key differentiator used here — less consistent settlement pattern — is a matter of degree, not kind, and is challengeable with evidence that individual lots in the LCZ balance do have consistent settlement characteristics.

What this means for your submission: If your Coningham / Snug LCZ lot has a consistent rural living settlement character (lot 1–10 ha, dwelling with outbuildings, rural activities), cite Kettering East as the primary similar locality — identical coastal setting, comparable landscape values, medium risk. Cite Snug Tiers Road as within-locality evidence that the same area can support RLZ where settlement pattern is recognised.

14. Kettering East & Oyster Cove [Channel Region]

Ireneinc outcome: Full ELZ → RLZ — largest LCZ retreat of Day 2. Ireneinc recommendation at Day 20: immediately [02:04:40–02:12:25]. This is the primary RLZ precedent for the southern Channel Region.

Characteristic	Kettering East & Oyster Cove — Outcome: Full Rural Living Zone — best comparison for southern Channel	Woodbridge (LCZ bulk) — Outcome: LCZ retained
Ireneinc landscape value description	'Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting; interface between coastline and bushland contributing to significant landscape value'	D'Entrecasteaux Channel views; bushland; scenic values — near-identical coastal and bushland language to Kettering East
Settlement characteristics found	Yes — clear rural living settlement; lots 1–10 ha along Manuka Road; consistent pattern throughout	Woodbridge Hill Road cluster: recognisable rural pattern. LCZ bulk: less consistent settlement
Lot sizes	1–10 ha (majority)	LCZ bulk: variable, some larger. Woodbridge Hill Rd: smaller
SPA coverage	Partial — not full coverage	Significant — greater SPA coverage than Kettering East in some areas
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium — full RLZ accepted	Medium-high — LCZ retained for bulk
DP6 — codes manage landscape values?	YES — full locality; codes and min lot size manage values; existing blocks already fully used	NOT fully concluded — channel views and bushland cited as requiring LCZ protection
Key differentiator cited	Clear consistent settlement pattern; existing blocks already fully used	Woodbridge Hill Rd cluster: fragmentation/rural activities → Rural Zone. LCZ bulk: channel views and continuous bushland
Zone outcome for Kettering East & Oyster Cove	Full RLZ — consistent	⚠ INCONSISTENCY: This locality is the most useful comparison for the southern Channel Region. Its full acceptance at medium risk, with a D'Entrecasteaux Channel coastal setting described in near-identical terms to LCZ-retained Woodbridge, Birchs Bay, Middleton, and Gordon, shows that coastal setting and bushland alone do not prevent RLZ. The distinguishing characteristic consistently cited for LCZ in the southern localities is the continuous bushland corridor along the ridgeline — which does not characterise every individual lot within those localities.

Submission argument (for all southern Channel LCZ localities): Cite Kettering East directly. Identical D'Entrecasteaux Channel coastal setting, identical landscape value language, partial SPA coverage — but full RLZ at medium risk. Argue that the continuous bushland corridor argument does not apply to individual cleared, developed, or lower-elevation lots that do not contribute to the ridgeline corridor. Use Kettering East's DP6 finding ('codes and min lot size manage values') and apply it to your property.

15. Kettering West [Channel Region]

Ireneinc outcome: Mixed — Rural Zone (Watsons Road); RLZ (Groombridges Road / central area); LCZ (elevated Saddle Road yellow block). Ireneinc recommendation at Day 20: after TPC acknowledgement that PVA overlay does landscape-protection work, not the zone [02:33:54].

Characteristic	Kettering West (Groombridges Rd) — RLZ — TPC corrected	Kettering East — Full RLZ	Tinderbox East — LCZ retained
Ireneinc landscape value description	Elevated bushland; similar Channel coastal setting to Kettering East; rural living characteristics present in Groombridges cluster	Identical coastal/bushland description — same Channel, same landscape character, same vegetation type	Near-identical elevated bushland and ridgeline description — see Tinderbox section for full quote
Settlement characteristics found	Yes — Groombridges cluster has clear rural living pattern consistent with Kettering East	Yes — clear rural living settlement throughout	Yes — residential settlement along Tinderbox Road; similar pattern
Lot sizes	1–7 ha (Groombridges cluster)	1–10 ha	1–10 ha
SPA coverage	Partial (elevated block only)	Partial	NO — absent on east coast
PVA / NAC overlay	Yes — PVA applies to Groombridges area	Yes	Yes
Risk rating applied	Medium (initially LCZ proposed; TPC corrected)	Medium (full RLZ)	Medium-high (LCZ)
DP6 — codes manage landscape values?	YES — TPC [02:33:54]: 'Priority Vegetation overlay does the landscape-protection work, not the zone' — PVA accepted as sufficient	YES — codes and min lot size; full RLZ	NO — SPA absent; RLZ height allowance creates risk
Key finding / TPC intervention	TPC delegates identified a problem and the consultant agreed to a change — PVA overlay is sufficient; zone does not need to be LCZ to protect landscape values	Recommended by Ireneinc without challenge	TPC challenged but accepted; flagged as weakest LCZ retention

Zone outcome for Kettering West	Mixed — inconsistency now partially corrected by TPC	⚠ INCONSISTENCY: The TPC's forced correction at [02:33:54] — that the PVA overlay does the landscape-protection work, not the zone — is the most important single statement from Day 20 for LCZ-affected landowners. This principle was NOT applied to Tinderbox East (where PVA is also present), despite near-identical characteristics. The inconsistency in applying the PVA-sufficiency principle selectively remains uncorrected.
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What this means for your submission: If PVA applies to your property, cite the TPC's statement at [02:33:54] directly — 'the Priority Vegetation overlay does the landscape-protection work, not the zone.' Show that PVA applies to your lot and argue that this is equivalent to the protection the TPC found sufficient at Groombridges. This argument applies to any LCZ locality where PVA coverage exists — Tinderbox East, Kingston West, Taroona, and others.

16. Woodbridge [Channel Region]

Ireneinc outcome: LCZ for bulk; eastern yellow block (Woodbridge Hill Road) → Rural Zone. Ireneinc recommendation at Day 20: Multiple representations from Woodbridge Hill Road argued LCZ was an an inconsistency for their road.

Characteristic	Woodbridge (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	D'Entrecasteaux Channel views; bushland; scenic values; continuous ridgeline bushland corridor extending to Birchs Bay and south to Gordon	Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting — near-identical Channel coastal landscape language
Settlement characteristics found	Woodbridge Hill Road cluster: recognisable rural pattern. LCZ bulk: variable lot sizes, less consistent residential pattern in some areas	Yes — consistent rural living settlement throughout locality; lots 1–10 ha
Lot sizes	LCZ bulk: variable, some larger. Woodbridge Hill Rd: smaller	1–10 ha (majority)
SPA coverage	Significant — greater than Kettering East in some areas	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — continuous bushland corridor cited as requiring LCZ protection	YES — codes and min lot size; existing blocks already fully used
Key differentiator cited	Continuous ridgeline bushland corridor (Birchs Bay to Woodbridge to Gordon); LCZ needed to maintain corridor	Clear residential settlement; blocks already fully used; existing codes protect landscape values
Within-locality precedent	Woodbridge Hill Road → Rural Zone: fragmentation avoidance + existing rural activities	—

Zone outcome for Woodbridge (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Kettering East, with a near-identical D'Entrecasteaux Channel coastal and bushland setting, was recommended for full Rural Living Zone at medium risk. Woodbridge LCZ bulk was recommended for Landscape Conservation Zone at medium-high risk citing the 'continuous bushland corridor' — but not every individual lot within the LCZ bulk contributes to this corridor, particularly cleared, lower-elevation, or developed lots. Rep 4 from Woodbridge Hill Road specifically argued their LCZ was an an inconsistency because 'nearly all properties along the road corridor were proposed to be rezoned to Rural Living Zone.'
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What this means for your submission: For Woodbridge LCZ lots that do not contribute to the ridgeline bushland corridor (cleared, developed, lower-elevation, set back from the ridgeline), argue that the corridor justification does not apply to your individual title. Cite Kettering East as the similar coastal-bushland locality that was recommended for full Rural Living Zone. For Woodbridge Hill Road lots, cite Rep 4’s argument directly alongside the Ireneinc Rural Zone cluster as evidence that the corridor argument does not apply to the road-frontage properties.

17. Birchs Bay [Channel Region]

Ireneinc outcome: LCZ for bulk; eastern yellow block → Rural Zone. Ireneinc recommendation at Day 20:. Pattern mirrors Woodbridge.

Characteristic	Birchs Bay (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Coastal bushland; scenic; D'Entrecasteaux Channel setting; eastern cluster has cleared/rural character. Ireneinc approach identical to Woodbridge — 'areas of elevating bushland features retained around existing development contributing to landscape value and overall scenic values'	Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting — same Channel coastal language
Settlement characteristics found	Eastern cluster: rural activities. LCZ bulk: variable lot sizes	Yes — consistent rural living settlement throughout; lots 1–10 ha
Lot sizes	Eastern cluster: smaller/cleared. LCZ bulk: larger/vegetated	1–10 ha
SPA coverage	Likely significant for coastal lots	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — same bushland corridor argument as Woodbridge	YES — codes and min lot size; full RLZ
Key differentiator cited	Continuous ridgeline bushland corridor (Flowerpot to Gordon)	Consistent settlement pattern; existing blocks already fully used; codes manage values

Zone outcome for Birchs Bay (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Same inconsistency as Woodbridge — D'Entrecasteaux Channel coastal and bushland setting nearly identical to Kettering East, but different zone outcome. Same argument applies: cleared, developed, or lower-elevation lots that do not contribute to the ridgeline corridor are not characterised by the landscape values cited for LCZ retention.
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What this means for your submission: Same as Woodbridge — cite Kettering East as the primary similar locality. For individual lots that are cleared, developed, or not on the ridgeline, argue the corridor justification does not apply to your title. Note that the Ireneinc approach to Birchs Bay and Woodbridge is identical — a submission that succeeds for Woodbridge is directly relevant to Birchs Bay.

18. Flowerpot [Channel Region]

Ireneinc outcome: LCZ for bulk; identifiable cluster → Rural Zone (split-zone approach). Ireneinc recommendation at Day 20:. Pattern consistent with Birchs Bay and Middleton.

Characteristic	Flowerpot (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Ridgeline bushland corridor connecting Birchs Bay to Gordon; 'elevating bushland features retained around existing development contributing to landscape value and scenic values including large areas of native vegetation hills'	Scenic landscape; coastal interface; bushland — same Channel region language. Landscape values present but manageable
Settlement characteristics found	Cluster: identifiable rural pattern with existing rural activities. LCZ bulk: larger vegetated lots	Yes — consistent rural living settlement throughout
Lot sizes	Cluster: smaller/cleared. LCZ bulk: larger/vegetated	1–10 ha
SPA coverage	Partial	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ bulk	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — corridor continuity cited	YES — codes and min lot size; full RLZ
Key differentiator cited	Ridgeline bushland corridor must be maintained (Birchs Bay to Gordon)	Consistent settlement pattern; existing blocks already fully used; codes manage values

Zone outcome for Flowerpot (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Same corridor argument as Birchs Bay and Woodbridge. Same Kettering East inconsistency. Additionally: Ireneinc accepted the split-zone approach for the cluster (Rural Zone for cleared/active parcels) — demonstrating that the corridor argument does not apply to every parcel within the locality boundary.
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What this means for your submission: The split-zone precedent within this locality shows that Ireneinc itself accepted that not every lot within Flowerpot contributes to the bushland corridor. For individual lots that are cleared, have existing rural activities, or are not part of the ridgeline vegetation, argue the corridor justification does not apply. Cite Kettering East and the within-locality Rural Zone cluster as dual precedents.

19. Middleton [Channel Region]

Ireneinc outcome: LCZ for bulk; eastern yellow block → Rural Zone (some split zoning). Ireneinc recommendation at Day 20:. Pattern consistent with Birchs Bay, Flowerpot, Gordon.

Characteristic	Middleton (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	'Elevating bushland features retained around existing development; large areas of native vegetation hills behind settlement along ridgeline; consistent bushland corridor extending south to Gordon and north to Flowerpot; Majors Hill prominent scenic feature'	'Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting' — same Channel coastal language; no Majors Hill equivalent cited
Settlement characteristics found	Eastern cluster: cleared; rural activities. LCZ bulk: larger vegetated lots on ridgeline	Yes — consistent rural living settlement throughout; lots 1–10 ha
Lot sizes	Eastern cluster: smaller/cleared. LCZ bulk: larger/vegetated ridgeline	1–10 ha
SPA coverage	Significant — Majors Hill and ridgeline area	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ bulk	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — Majors Hill and ridgeline corridor cited as requiring LCZ	YES — codes and min lot size; full RLZ
Key differentiator cited	Majors Hill prominent scenic feature; ridgeline native vegetation hills; continuous corridor to Gordon and north to Flowerpot	Consistent settlement pattern; existing blocks already fully used; codes manage values

Zone outcome for Middleton (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Middleton has the most specifically explained landscape value in the southern Channel group — Majors Hill and the vegetated ridgeline hills are named features. However, not every lot within the LCZ bulk is ON the Majors Hill ridgeline or contributes to the elevated bushland corridor. Cleared, lower-elevation, or settled lots in the LCZ area that sit below or away from the ridgeline are not characterised by those specific landscape values.
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What this means for your submission: The Majors Hill and ridgeline landscape value does not apply to every lot in the LCZ bulk. If your Middleton lot is below the ridgeline, cleared, at lower elevation, or does not contribute to views of or from Majors Hill, show this site-specific differentiation. Cite the eastern cluster Rural Zone as within-locality evidence that cleared lots are appropriately zoned Rural Zone or RLZ, not LCZ. Cite Kettering East for the broader coastal bushland inconsistency.

20. Gordon [Channel Region]

Ireneinc outcome: LCZ bulk; LDRZ coastal strip; Rural Zone (western parcels with rural activities). Ireneinc recommendation at Day 20:, with one mapping correction — crown land at Craigers Road corrected from LCZ to EMZ [04:07:57].

Characteristic	Gordon (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	D'Entrecasteaux Channel coastal setting; bushland; southern end of ridgeline corridor (extending north through Middleton, Flowerpot, Birchs Bay, Woodbridge to Kettering)	Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting — same Channel coastal language used throughout the Channel Region
Settlement characteristics found	Western parcels: rural activities (grazing, farming). LDRZ strip: small coastal residential. LCZ bulk: variable lot sizes	Yes — consistent rural living settlement throughout; lots 1–10 ha along Manuka Road
Lot sizes	Western Rural Zone: larger rural. LDRZ: small. LCZ bulk: variable	1–10 ha
SPA coverage	Likely significant coastal coverage	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — southern anchor of the bushland corridor cited	YES — codes and min lot size; full RLZ
Key differentiator cited	Southern anchor of the D'Entrecasteaux Channel bushland corridor; connection between channel coastal landscape and terrestrial bushland	Consistent settlement pattern; existing blocks already fully used; codes manage values
Mapping correction	Crown land at Craigers Road corrected from LCZ to EMZ at Day 2 [04:07:57] — Ireneinc confirmed the correction	—

Zone outcome for Gordon (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: The Gordon LCZ bulk is the southern anchor of the channel corridor argument used consistently from Woodbridge south. The same Kettering East inconsistency applies — coastal setting, bushland, scenic values, but different zone outcome. The mapping correction at Day 20 also shows the TPC will correct errors, including zone boundary errors, if raised.
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What this means for your submission: If your Gordon LCZ lot is not on the elevated coastal bushland interface (cleared, western-side rural, or developed), argue differentiation from the corridor value. The western Rural Zone was accepted because existing rural activities dominate — if your lot has rural character, use T2 and cite the Rural Zone precedent. For LDRZ coastal strip lots incorrectly remaining in LCZ, argue that LDRZ is the appropriate zone based on the coastal strip designation. Raise any mapping errors explicitly — the TPC corrected one on the day.