

265 Glenwood Road
RELBIA TAS 7258

12th December 2021

Planning Authority
Northern Midlands Council
PO Box 156
LONGFORD TAS 7301

Via email: lps@nmc.tas.gov.au

Representation about the Northern Midlands Draft LPS – request to rezone our property at Gulf Road, Liffey, from Agriculture to Landscape Conservation

Attention: Northern Midlands Planning Authority

We are the owners of the 92.2 ha forested property on three titles at Gulf Road, Liffey (PID 6753767, Title Refs 115193/1, 115192/2 and 128705/1). In the currently exhibited Draft Zone Maps our property is zoned as Agriculture.

According to the Tasmanian Planning Commission's Guideline No 1 the most appropriate zone for our property is Landscape Conservation for the reasons presented below.

Compliance with Guideline LCZ 2

It is entirely covered by bushland including large areas of threatened native vegetation communities as well as containing and providing habitat for threatened fauna (Guideline LCZ 2(a)).

A report prepared by a Bush Heritage Australia (BHA) ecologist about our property states the following:

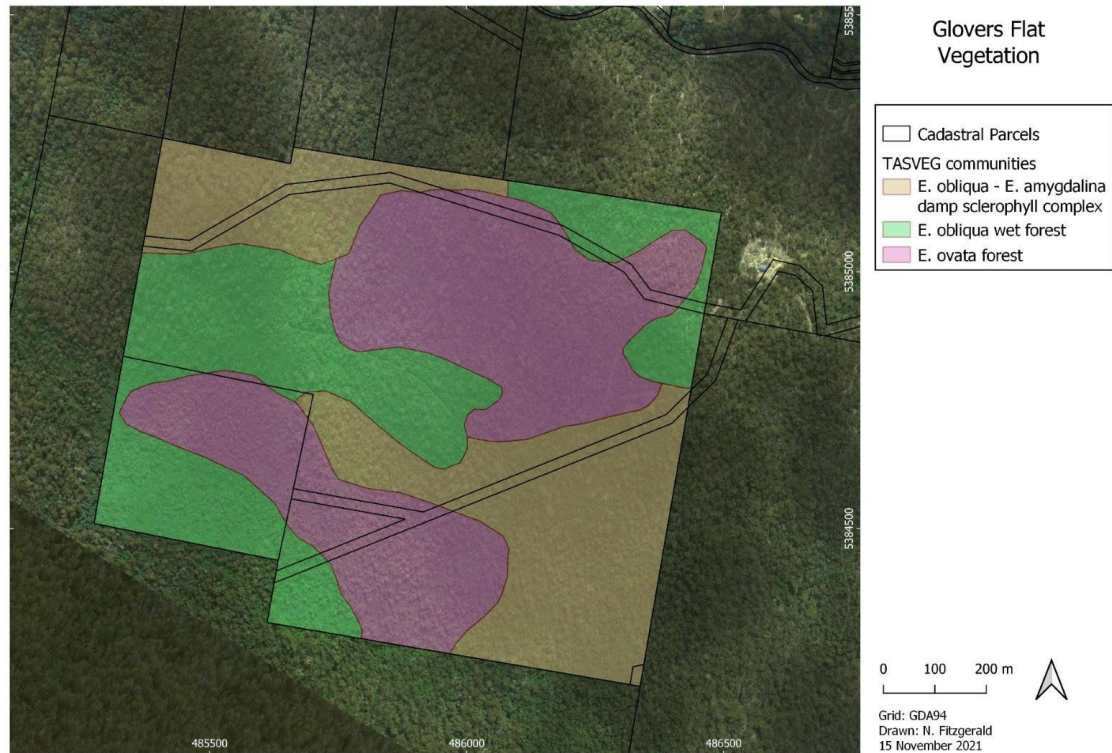
The site contains a large patch of critically endangered forest dominated by black gum (Eucalyptus ovata). More than 90% of this forest type has been cleared in Tasmania and most of the remainder is in small fragments. Large old-growth trees retained when the forest was selectively logged in the past continue to provide habitat for hollow-nesting fauna. The damp sclerophyll forest provides a rich habitat for the largest surviving marsupial carnivores, the Tasmanian devil and spotted-tail quoll.

Patches of the threatened Eucalyptus ovata forest community of this size (38 ha) are rare, with the average patch size in Tasmania 6 ha and 75% of patches less than 5 ha (DPIPWE 2019).

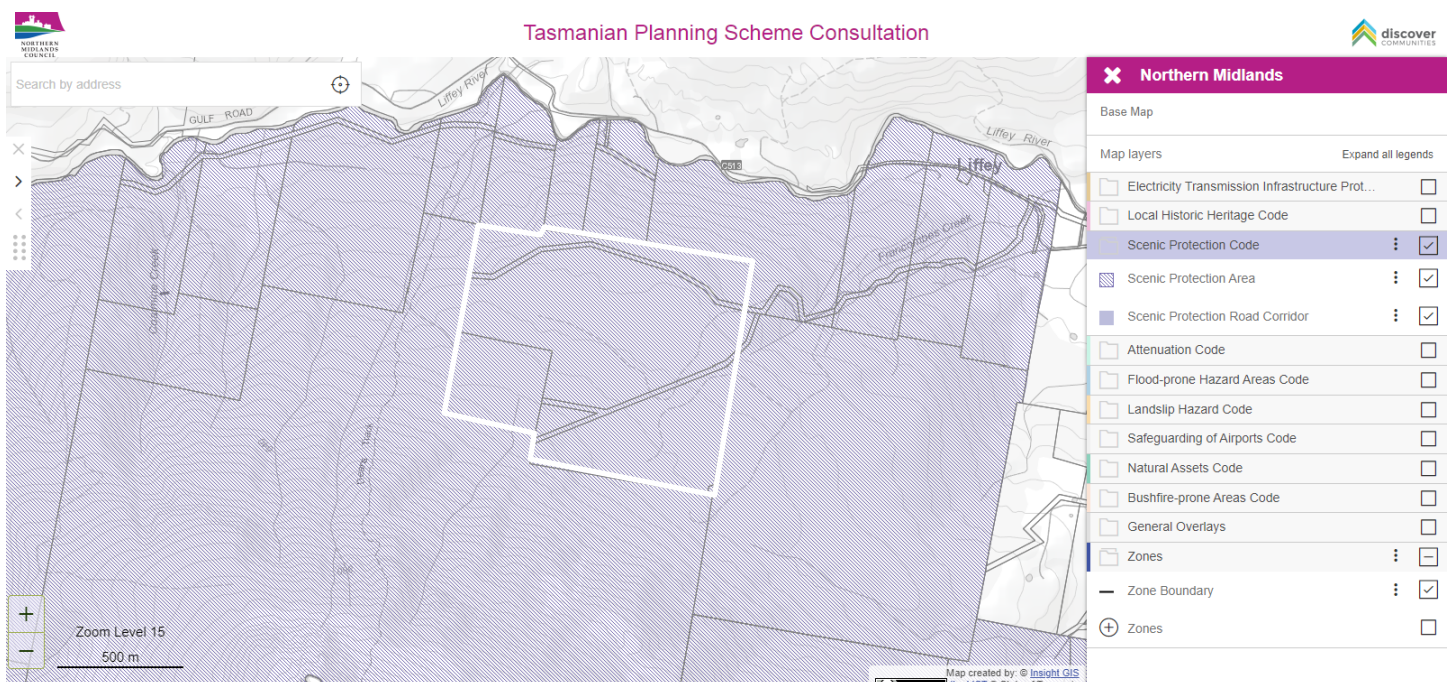
The endangered Tasmanian devil (*Sarcophilus harrisii*) and the Spotted-tail quoll (*Dasyurus maculatus maculatus*) are listed in Schedules 3 and 4, respectively, of the *Threatened Species*

Protection Act 1995 as well as being listed in the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999*.

The map showing the extent of threatened vegetation community No 20 *Eucalyptus ovata* forest and woodland, as listed in Schedule 3A of the *Nature Conservation Act 2002*, is presented below.

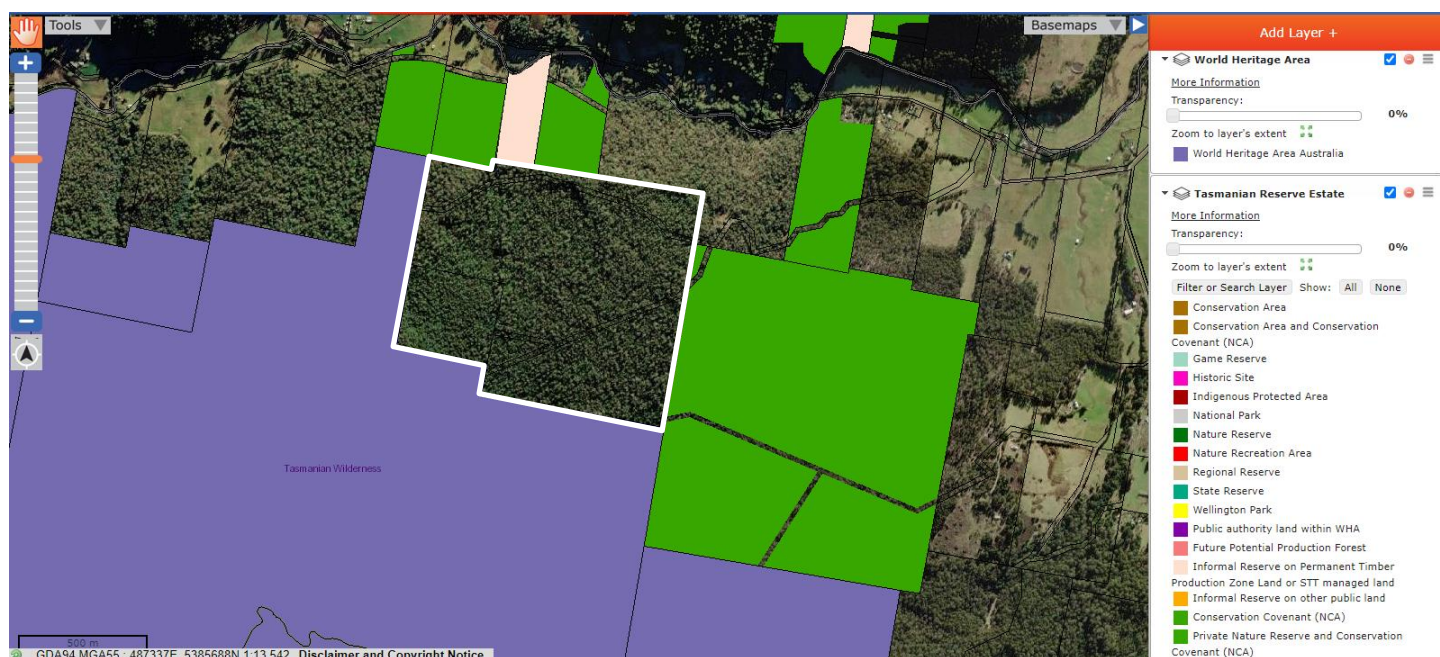


Furthermore our property (white border) is overlain by the proposed Great Western Tiers Scenic Protection Area under the Scenic Protection Code (Guideline LCZ 2(b))



Our property adjoins the Tasmanian Wilderness WHA zoned Environmental Management as well as several Private Reserves also proposed by their owners for Landscape Conservation Zone.

Our property (white border) adjoins the Tasmanian Wilderness World Heritage Area to its west and south (see ListMap satellite image below) and the Australian Government's *EPBC Act 1999* regulates actions occurring on our property that are likely to have a significant impact on the World Heritage values of the Tasmanian Wilderness. Our property also adjoins the Dry's Bluff Reserve to its east, the Oura Oura and Gulf Resort Reserves to its north west and the Liffey River Reserve to its north, all part of the Tasmanian Reserve Estate and protected by conservation covenants. The owners of all of these private reserves are also requesting rezoning of their properties to Landscape Conservation Zone.

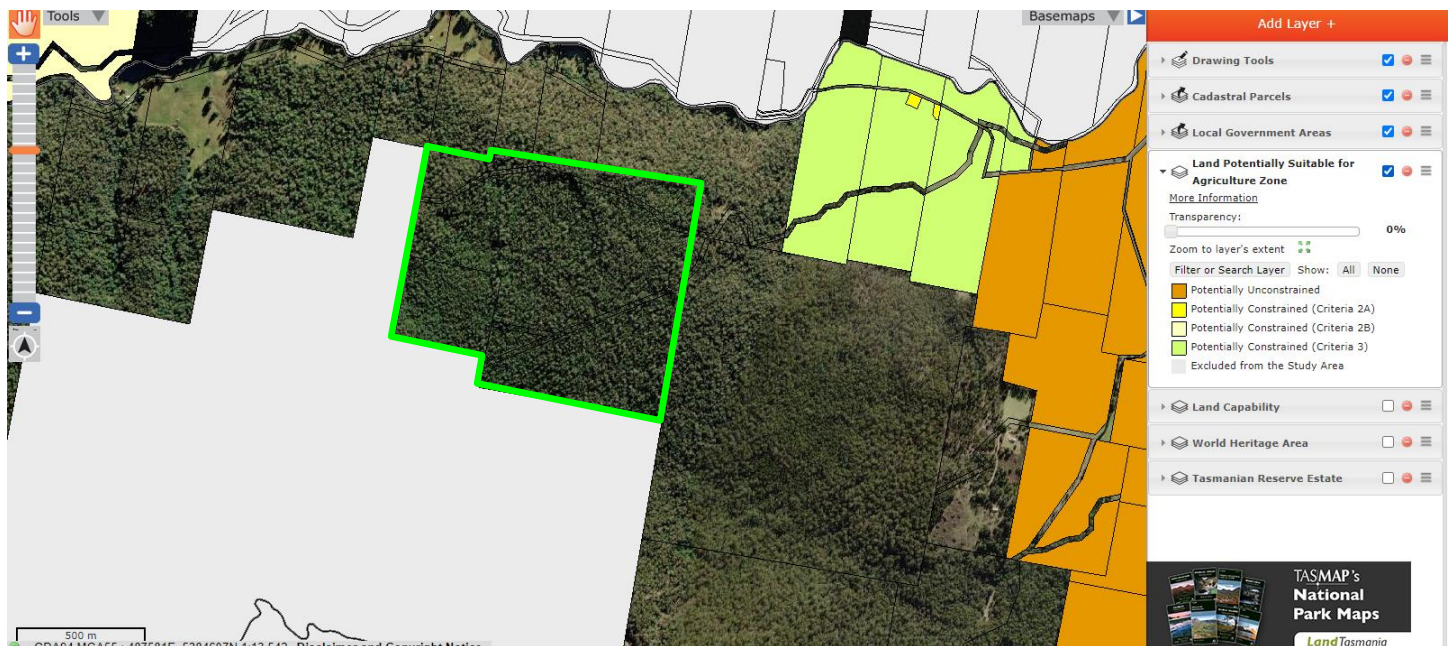


Based on the Agricultural Land Mapping Project analysis and Guideline AZ7 our property should not have been included in the Agriculture Zone.

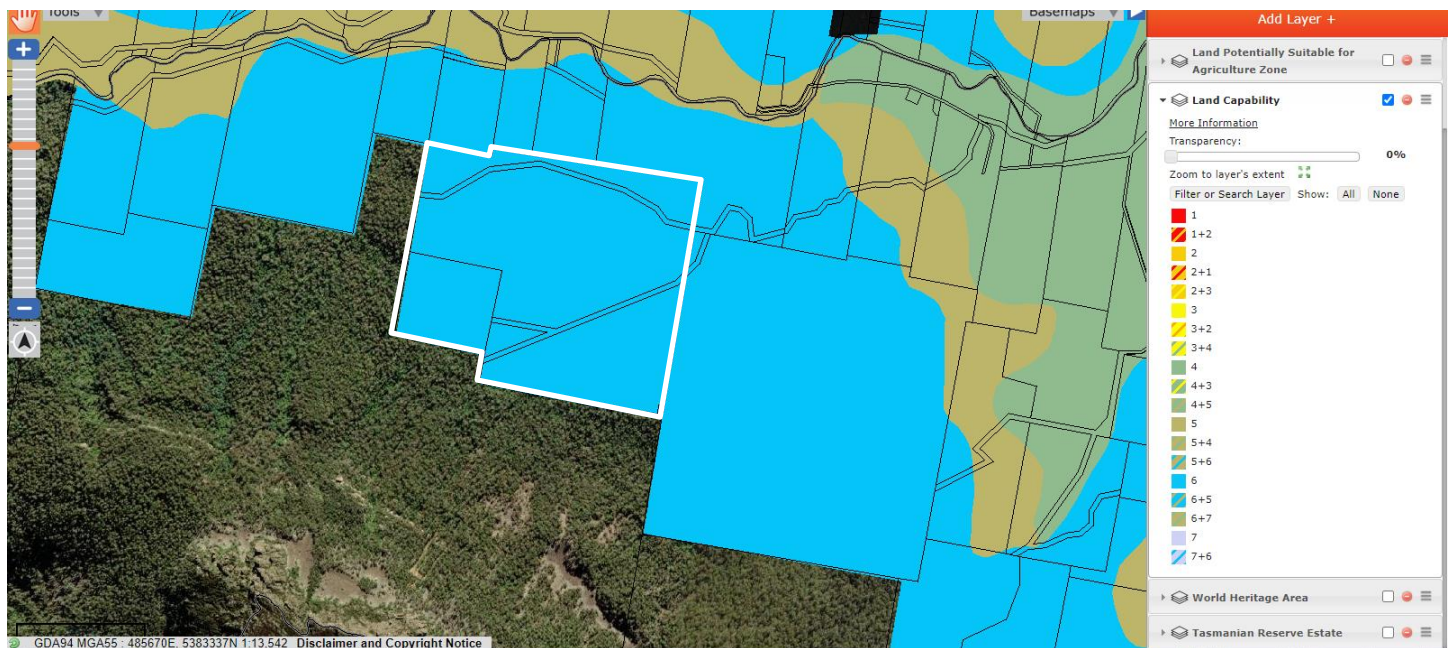
The Agricultural Land Mapping Project determined that our property was not suitable for Agriculture Zone by excluding it during Step 5 of their analysis when they considered the five broad Enterprise Suitability clusters in their Table 2 on page 9 of the Background Report. Consequently our property appears as uncoloured in the 'Land Potentially Suitable for Agriculture' layer (see ListMap screenshot on next page). The ESS Cluster used TASVEG 3.0 and the Land Capability data. As can be seen on the ListMap Screenshot of this Layer on the next page all of the title is Land Capability Class 6 which means that it has severe limitations for agricultural use and 'should be retained under its natural vegetation cover'.

Furthermore no evidence has been presented by the Planning Authority in its Supporting Report justifying that our property be included in the Agriculture Zone under Guideline AZ7, a necessary condition for land not identified in the 'Land Potentially Suitable for Agriculture Zone' layer.

ListMap Screenshot of 'Land Potentially Suitable for Agriculture Zone' Layer



ListMap Screenshot of 'Land Capability' Layer



Rezoning our property to Landscape Conservation Zone represents sound strategic planning

In view of the connectivity of all of these private properties and public reserves, all clearly unsuitable for and not used for agriculture, and that good strategic planning will apply similar zones across titles with similar values, the case for rezoning our property to Landscape Conservation is further strengthened.

Yours sincerely

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