
From: Kate & Euge Lehmensich <[REDACTED]>
Sent: Monday, 4 May 2026 9:17 PM
To: Kingborough LPS
Cc: [REDACTED] troy silvester; Amy Ivey; Robyne Kerr; Paul;
[REDACTED]
Subject: Additional Information for Submission #68 Following the Irenelnc Report
Attachments: Representation #68 - Additional Submission Following Irenelnc Report.pdf

To whom it may concern,

Please find attached additional information relating to Submission #68 in connection with the Kingborough Local Provisions Schedule.

I respectfully request that all future correspondence regarding Representation #68 be directed to all parties included in the carbon copy field of this email.

With thanks,

Eugene

TPC Hearing Relating to Woodbridge Hill Saddle

To: Mr Nick Heath
Chair
LPS Hearings - Tasmanian Planning Commission
Re: Representation #68 - Addendum regarding zoning of [REDACTED]

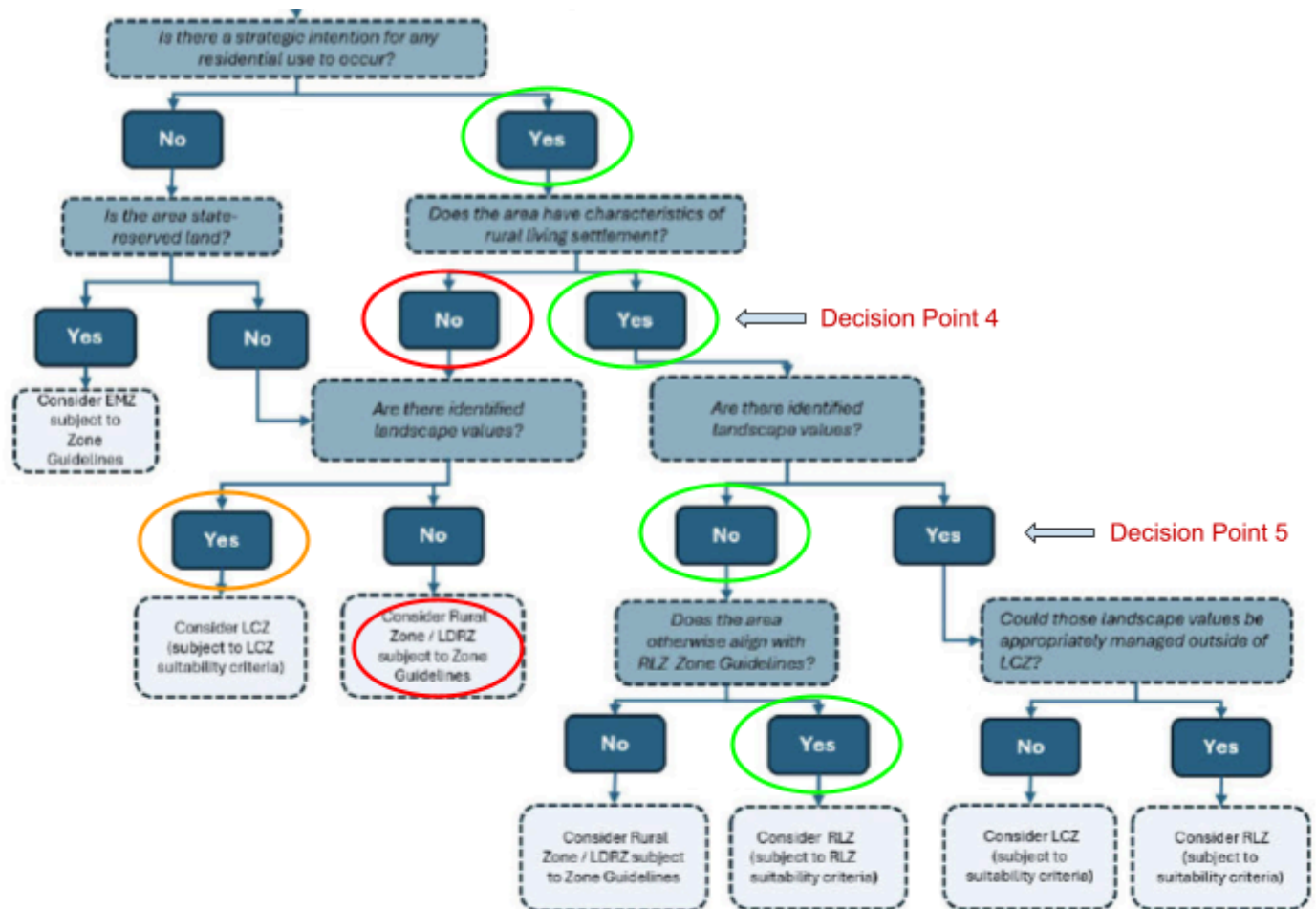
Dear Mr Heath,

We are writing in relation to the proposed zoning of the properties listed below

Lot	Address	Current Zone (KIPS 2015)	Proposed Zone (Draft LPS, TPS 2025)	Proposed Zone (IreneInc Report 2026)
[REDACTED]	[REDACTED]	Environmental Living	Rural Zone (RZ)	Rural Zone (RZ)
[REDACTED]	[REDACTED]	Environmental Living	Rural Zone (RZ)	Rural Zone (RZ)
[REDACTED]	[REDACTED]	Environmental Living	Rural Zone (RZ)	Rural Zone (RZ)
[REDACTED]	[REDACTED]	Environmental Living	Rural Zone (RZ)	Rural Zone (RZ)
[REDACTED]	[REDACTED]	Environmental Living	Landscape Conservation (LCZ)	Rural Zone (RZ)
[REDACTED]	[REDACTED]	Environmental Living	Landscape Conservation (LCZ)	Rural Zone (RZ)

Please consider this addendum to our original submission, based on the **Ireneinc Presentation to the Tasmanian Planning Commission on 14/15 April 2026**, with regard to the physical characteristics of the land, the existing access arrangements, and the implications of the incoming Tasmanian Planning Scheme (TPS) on long-established existing land uses. We submit that the **Rural Zone** is not an appropriate or strategically justified zoning outcome. The **Rural Living Zone** provides the most accurate and policy-aligned reflection of the established use and physical context.

1. Application of the Ireneinc Decision Tree to Woodbridge Hill Saddle



In Ireneinc's application of the decision tree, (assumed in red, although unclear at Decision Point 5) the resulting zoning proposed (Rural Zone) is not consistent with the decision point evaluation noted in the report. Initially, at Decision Point 4, the Ireneinc analysis suggests that the area does not possess characteristics of a rural living settlement:

Decision Point 4

Does the area have characteristics of rural living settlement?		
Indicators:	Ireneinc Evaluation:	Note:
• Evident subdivision pattern of at least 10 smaller blocks generally ranging in size between 1-15ha with lots contributing to a consistent lot pattern. • Consistent pattern of detached dwellings with associated outbuildings. • Visual evidence in aerial mapping of rural activities occurring (i.e. cleared areas providing for resource development/grazing/hobby farming etc).	This area has a mix of properties with a lot size of between 7ha and 21ha that and although some properties have characteristics of a rural living settlement, they are not consistent and the mix of lots larger than 15ha and the remaining number of lots in this area which are less than 15ha do not align with a rural living settlement.  On balance, no consistent rural living settlement pattern is evident in the locality.	• There is a clear subdivision pattern of smaller blocks ranging from less than one hectare (PID [REDACTED]) to a single large outlier (PID [REDACTED]) of 45 hectares. • From the table below (source: www.planbuild.tas.gov.au), it is clear that there are more than 10 properties and they are generally between 1-15ha, sharing a consistent lot pattern. • The properties are primarily used for residential purposes, including a mix of permanent approved dwellings, short stay holiday accommodation and informal temporary accommodation. I have indicated these properties with a 🏠 in the table below, highlighting the consistent pattern of detached dwellings and associated outbuildings. • Even in the low resolution image included in the report, it is immediately clear that there is evidence of cleared areas offering opportunities for hobby farming or grazing. In many cases, this is a current use for the property. Additionally, the area contains a Declared Private Timber Reserve, providing for small-scale resource development. On balance, the locality strongly reflects the indicators of a rural living settlement.

Locality Property Information

Address	PID	Title Reference	Area (ha)	Use
[REDACTED]	[REDACTED]	[REDACTED]	6.899	
[REDACTED]	[REDACTED]	[REDACTED]	3.123	
[REDACTED]	[REDACTED]	[REDACTED]	15.225	
[REDACTED]	[REDACTED]	[REDACTED]	21.916	
[REDACTED]	[REDACTED]	[REDACTED]	2.587	
[REDACTED]	[REDACTED]	[REDACTED]	19.336	
[REDACTED]	[REDACTED]	[REDACTED]	2.506	
[REDACTED]	[REDACTED]	[REDACTED]	1.261	
[REDACTED]	[REDACTED]	[REDACTED]	0.688	
[REDACTED]	[REDACTED]	[REDACTED]	45.32	
[REDACTED]	[REDACTED]	[REDACTED]	14.93	
[REDACTED]	[REDACTED]	[REDACTED]	6.089	
[REDACTED]	[REDACTED]	[REDACTED]	7.672	

Decision Point 5

Are identified landscape values present?		
Indicators	Ireneinc Evaluation	Notes
- Consider localised landscape value statements and its extent within an area. - Confirm presence of identified landscape values including: - Bushland areas - large areas of native vegetation - Areas of scenic value. Scenic protection and priority vegetation mapping to inform identification of values, however attributes which contribute to landscape values may be considered in other ways including presence of identified attributes determined through mapping or photography.	N/A – as no rural living settlement characteristics were identified. Whilst no evaluation was completed in the report, from the Hearings on 15 April, 2026, the assertion was made that the area broadly possesses landscape values.	- The area being evaluated in the Woodbridge Hill Saddle is fragmented into multiple small lots, tucked down below the surrounding ridgelines. - The landscape is modified, not pristine: existing dwellings, driveways, clearing, and past grazing and silvicultural activity interrupt any intact landscape character. - The area is not identified in regional planning documents as a priority scenic landscape. - The lots are nearly invisible from any vantage point except Woodbridge Hill Road itself — from which, they appear as rural-residential blocks. - The remnant strips of native vegetation are largely regrowth, not old-growth or high-integrity forest. On balance, this area does not indicate identified landscape values, though some natural values are definitely present.

Above, is an exploration of the decision tree at Decision Point 5. Whilst, at the TPC Hearing on 15 April, 2025, Ireneinc asserted that the locality broadly has landscape values, there was no evidence of any evaluation against the indicators. This incomplete conclusion has seemingly encouraged a Rural Zoning recommendation. Even if landscape values are present, with the correct outcome at Decision Point 4, the Rural Living Zone is the appropriate zone, on the proviso that landscape values can coexist with RLZ through sensible management. Therefore, the application of the Rural Living Zone is again shown to be consistent with both the State Planning Provisions and Ireneinc's decision-tree methodology.

2. Access via Crown Road and TPS Requirements

The properties to the south of [REDACTED] rely on a Crown road for legal access, which is allowed under the TPS in line with their residential nature. The misapplication of the Rural Zone (or the LCZ incidentally) mandates a different road configuration to match the uses permitted in those more intense zones. Whilst the use is currently residential, domestic traffic and vehicles to 20T (loaded TFS tanker) may need to use the road - accordingly, the road and passing bays have been built, by the residents, to this standard.

Under the TPS, both the Rural Zone and the Landscape Conservation Zone require that access to a dwelling be via: a constructed public road, or a constructed private road secured by freehold title or a registered right-of-way. Noting that a Crown licence does not satisfy this requirement, this raises several implications: **A dwelling or dwelling upgrade is not approvable under the Rural or LCZ zones.** Landowners would then need to upgrade or formalise access to a standard that would suit agricultural and rural resource traffic - both of which are unsuitable given the topography of the existing road formation. If it were even possible, the cost for a formalisation or upgrade would be prohibitive in the extreme and would constitute a de facto extinguishing of any existing rights to construct or upgrade a dwelling on these properties.

The existing Crown road access is consistent with rural-residential use and the Rural Living Zone, but not with the Rural Zone. Whilst this was included in our earlier submission to the TPC, it was overlooked in the Ireneinc Report and is another reason why the current recommendation is not appropriate for this locality.

3. Extinguishing of Existing Land Uses

3.1 Subdivision Potential

In this locality, under the Environmental Living Zone (KIPS 2015), two larger lots hold reasonable subdivision potential, subject to environmental constraint and Council approval. The Rural Zone, with a 40ha minimum subdivision extinguishes this potential, representing a significant reduction in development entitlement. Given the small size of the balance of properties, an RLZ zoning with a 10ha minimum lot size protects potential of the two larger properties in this locality, without creating new subdivision opportunities.

3.2 Access to Natural Resources

Several of these properties have a history of silvicultural activity, including selective harvesting, regrowth management and timber cultivation. These activities were lawful under previous schemes and constitute existing use rights under LUPAA. Careful consideration of zoning and application of codes (NAC and SPC), must be undertaken to mitigate regulatory barriers that limit or extinguish access to resources historically available to landholders. This is particularly important where significant silvicultural investment and activity has already been undertaken.

3.3 Rural-Residential Use

The Rural Zone introduces intensification of activity, permitting 24-hour rural-resource operations that are inconsistent with the long-established rural-residential character of the area. This represents a functional downgrade of existing zoning and land use and extinguishes residential amenity that can reasonably be expected by landholders at present. The Hours of Operation stipulated in the Rural Living Zone (which are not contained in the Rural Zone) indicate that RLZ is the appropriate zoning that will protect the residential amenity of the [REDACTED].

4. Conclusion

When the Ireneinc decision tree, access arrangements, existing land uses, and SPP requirements are considered together, the Rural Zone is not an appropriate or strategically justified zoning outcome for these properties. The Rural Living Zone:

- reflects the established rural-residential use
- aligns with the physical characteristics of the land
- accommodates existing Crown road access
- avoids extinguishing several existing land uses
- preserves reasonable subdivision expectations
- is consistent with the methodology presented to the Commission

We respectfully request that the Commission apply the **Rural Living Zone** to our properties along the Woodbridge Hill Saddle.

Respectfully,

Natisha Knight

[REDACTED], Woodbridge Tas 7162
[REDACTED]

Troy Silvester

[REDACTED], Woodbridge Tas 7162
[REDACTED]

Amy Ivey

[REDACTED], Woodbridge TAS 7162
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Robyne Kerr

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Paul Rapley

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