
From: Iain More <Iain.More@launceston.tas.gov.au>
Sent: Tuesday, 12 April 2022 3:46 PM
To: TPC Enquiry
Cc: McCrossen, Samuel; James Stewart
Subject: Launceston Draft LPS - Rep. 24 - Further Consideration Request
Attachments: 299 Relbia Road - RMCG Letter re rep 24 290322.pdf; Launceston Draft LPS - 299 Relbia Road.pdf

Dear Delegates,

Please find attached information pertaining to representation No. 24 of the Launceston Draft Local Provisions Schedule.

Should you require any further information or clarification please do not hesitate to contact me.

Kind Regards,

Iain More | Town Planner | City Development | City of Launceston
T 03 6323 3382 | www.launceston.tas.gov.au



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#1542

29 March 2022

Iain More

Town Planner, City of Launceston

Via email: Iain.More@launceston.tas.gov.au

Dear Iain,

Review of Representation 24 Regarding Proposed Agriculture or Rural Zoning in City of Launceston's Local Provisions Schedules of the Tasmanian Planning Scheme.

I have undertaken a review of representation 24 against proposed Agriculture zoning that was made in response to the public exhibition period for the proposed City of Launceston (CoL) Local Provisions Schedule of the Tasmanian Planning Scheme. The information considered includes:

- S.35 Report – 24. Michelle Schleiger – Woolcott Surveys – 299 Relbia Road – 17.09.2021
- S.35 Report – 24. Michelle Schleiger – Woolcott Surveys – 299 Relbia Road – 15.11.2021
- Representation 24 – Woolcott Surveys for land at 299 Relbia Rd, Relbia 17.09.22
- AK Consultants (now RMCG) (2019). Agricultural Land Mapping in the City of Launceston
- Publicly available desktop information
- Verbal report and compiled map on vineyard suitability from on site assessment undertaken by Dr Reuben Wells (Ag Logic Pty Ltd)

The key points made in the representation have been considered and I have also reviewed the characteristics of the land against the Decisions Rules developed by AK Consultants (now RMCG). These Decision Rules were utilised to delineate the Agriculture and Rural zones from the existing Rural Resource zone in the CoL municipal area from the *Agricultural Land Mapping in the City of Launceston 2019* report, by AK Consultants (now RMCG). The representation key points and recommendations are provided below in Table A1-1. If you would like to discuss any of these matters further, please don't hesitate to contact me.

Kind regards,



Michael Tempest

SENIOR CONSULTANT

REFERENCES

AK Consultants (now RMCG) (2019). Agricultural Land Mapping in the City of Launceston.

City of Launceston (2021). Local Provisions Schedule – Tasmanian Planning Scheme.

Department of Justice. (2017) Agricultural Land Mapping Project - Background Report, Tasmanian Government.

RMCG (January 2022). Enterprise Scale – For primary production in Tasmania. Report prepared to further the concept of the Rural Enterprise Concept for Flinders Local Provisions Schedule. Report prepared for Town Planning Solutions on behalf of Flinders Council

APPENDIX 1: EXTRACT FROM 2019 REPORT

The following extract is from the AK Consultants (now RMCG) (2019) Agricultural Land Mapping in the City of Launceston Report.

25 – RELBIA

This area was selected because of a cluster of titles mapped as ‘constrained’ and ‘unconstrained’ that are isolated from the rest of the agricultural estate in the Launceston municipality. To the north and east is land zoned Rural Living. To the south and west is the Northern Midlands Municipality. Adjacent titles are currently zoned Rural Resource and have been mapped as ‘unconstrained’. For the purposes of this assessment, it was assumed that all adjacent titles with Northern Midlands will be zoned Agriculture.

The assessment identified that all titles, bar one, had an existing dwelling located on them and all were individually owned. The assessment also identified two titles (CT 144388/1 & CT 129968/2) that have ‘commercial scale’ characteristics. Titles adjacent to CT 144388/1 & CT 129968/2 have similar physical characteristics. The two titles with ‘commercial scale’ characteristics were assessed to be most suited to the Agricultural Zone and the adjacent titles with similar physical characteristics were also determined to be suitable for the Agriculture Zone. Some small titles with limited agricultural potential have been also recommended to be zoned Agricultural to protect the productive capacity of the titles recommended for the Agriculture Zone and to provide a consistent zoning pattern.

There were two clusters of ‘constrained’ titles identified within the assessment area. Titles within these clusters were all identified as having ‘lifestyle’ characteristics. It was determined that these titles would be most appropriately suited to the Rural Zone.

CT144388/1 (the Jinglers Creek vineyard title) was conservatively assessed as having commercial scale characteristics based on the rapid assessment method used. This determined that the vineyard:

- Had irrigation water resources (i.e. a 4.5ML dam with an adjacent bore yielding 4.42L/sec)
- More than 2ha under vines
- Is well connected to adjacent land (i.e. CT 122876/1) with similar characteristics (i.e. it has potential to expand).

Hence the main impetus for CT 122876/1 to be zoned Agriculture was to protect the agricultural operation on CT 122876/1.

This more detailed assessment provides further information which suggests Jinglers Creek vineyard is reliant on town water and has little opportunity for additional irrigation water resources. This limits the commercial potential of the vineyard.

APPENDIX 2: REPRESENTATION SUMMARY

Table A1-1 identifies the key points made in the representation and our response.

Table A1-1: Representation 24 Summary and response

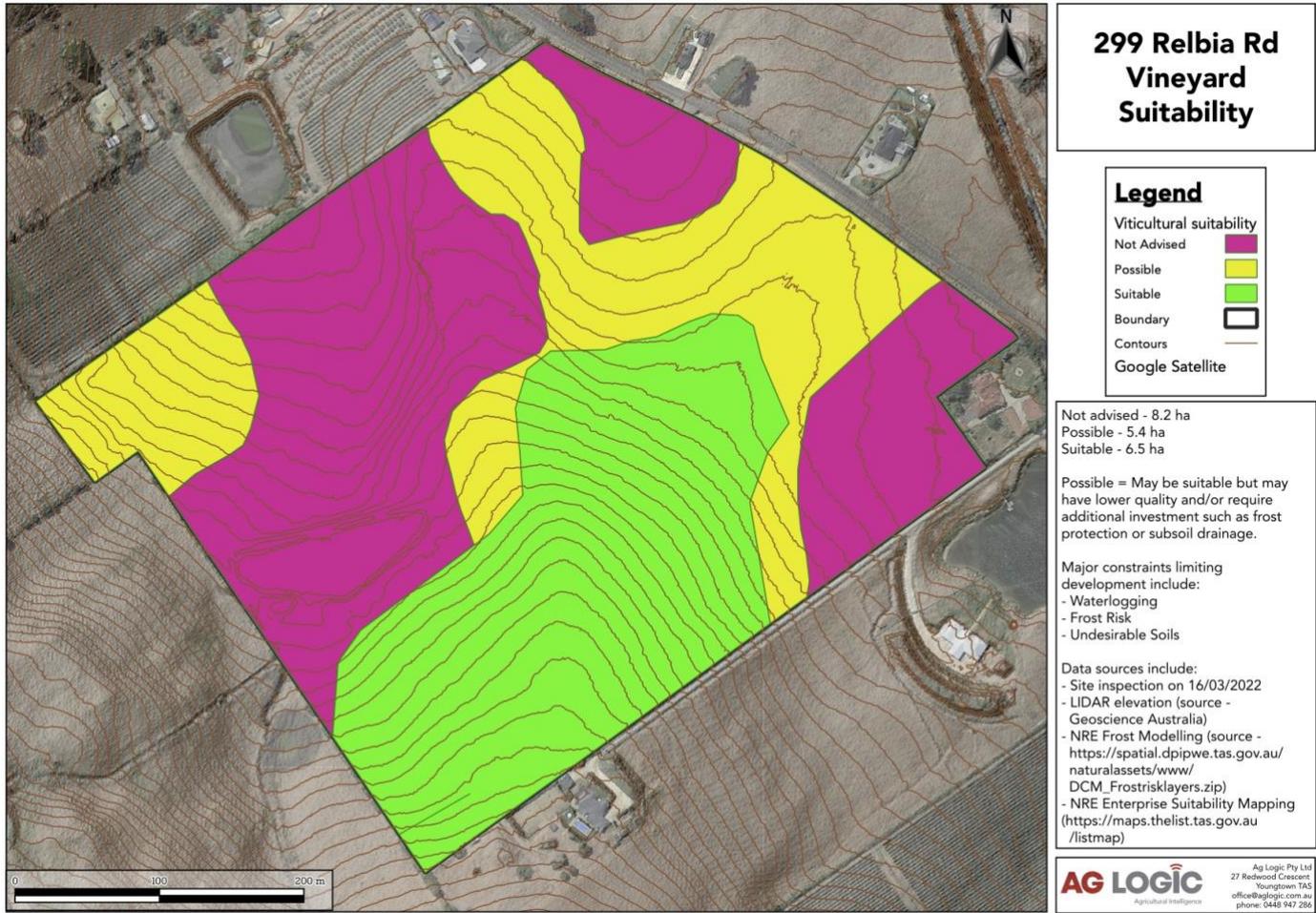
REPRESENTATION MAIN POINTS	RMCG COMMENTS & RECOMMENDATION
<p>The title (35.67ha) is in three sections, two of which are drafted to retain Rural Living Zone. The submission requests that the third section (west of Relbia Road – 20.23ha (the subject land)) be considered for Rural Living, to bring the property under one single zone, or, to Rural Zone. A supporting Agricultural Assessment, Noise and Planning Report was provided with the representation.</p> <p>Ag Assessment Key Points</p> <ul style="list-style-type: none"> ▪ The subject land is constrained, surrounded by residential development and not suitable for viable farming ▪ Assessed Land Capability of the title is Class 4e (15.77ha) and Class 5d (19.9ha), with approximately 10ha of the subject land assessed as Class 4e ▪ Water resources are comprised of a 4.5ML off-stream stock dam. There is no access to a suitable irrigation water resource supply ▪ Zoning the subject land as Rural (or Rural Living) will provide a buffer between the Agriculture and Rural Living zones ▪ The subject land is mapped as ‘Unconstrained’. Bordered by Potentially Constrained 2A to the SE, Potentially Constrained 2B to the NW and Unconstrained to the SW. 	<p>Our response addresses whether the subject land is more suited to the Agriculture zone or Rural zone. Whilst Rural Living may be considered as an alternative by Council; this has not been considered in our response.</p> <p>Our response has only considered agricultural aspects of the representation; this does not include consideration of the noise report.</p> <p>We agree with the majority of aspects of the Agricultural Assessment. This land is limited due to size, Land Capability limitations, lack of an irrigation water resource and surrounding land use. It is unlikely that this title could support a commercial scale agricultural activity.</p> <p>The agricultural assessment, does not, however, adequately consider:</p> <ul style="list-style-type: none"> ▪ Irrigation water resources. <p><i>There is a bore on the Jinglers Creek title (CT129968/2) to the north which yields 4.42 L/sec. Despite the existing bore, our understanding is that the Jinglers Creek vineyard is reliant on town water which is not a commercially viable option for a larger scale vineyard. It is likely that the bore is too saline for vineyard production, hence the reliance on town water.</i></p> <p><i>The subject land is immediately adjacent to the North Esk Irrigation Scheme District and downslope of land which has a connection and Irrigation Rights (150ML) (TI Water Entitlements Register available on line https://www.tasmanianirrigation.com.au/water-entitlement-register-2). Hence there is some potential for access to Irrigation Water.</i></p> <ul style="list-style-type: none"> ▪ Vineyard suitability or the potential for intensification.

REPRESENTATION MAIN POINTS	RMCG COMMENTS & RECOMMENDATION
<p>To the NE is the balance of the title (15.44ha) which is currently in the Rural Living zone</p> <ul style="list-style-type: none"> ▪ Rural Zone would provide for a greater range of uses under the TPS ▪ Limitations of land make it unviable for commercial cropping or horticultural activities ▪ The property is used to graze 25 breeding cows and finishing calves and this is considered the most appropriate use. Estimated DSE is 672 and a gross margin from grazing is \$900/ha ▪ It is not considered to be valuable agricultural land. <p>Planning Report Key Points</p> <ul style="list-style-type: none"> ▪ According to Section D of the RLUS the subject site straddles the Future Investigation Area – Strategic Reserve Investigation Area and Rural Area ▪ These areas are considered by the NTRLUS to be inside an Urban Growth Area and can be rezoned for urban development, depending on local strategies ▪ The cadastre is fragmented with varied lot sizes and surrounding development means land consolidation is highly unlikely ▪ The Rural zone is a more applicable zone for the land with respect to the limitations on how it can be farmed and with regard to the proximity of residential use in the area ▪ The application of the Rural Living Zone would create consistency within the land title and with the surrounding development pattern. 	<p><i>Dr Wells has identified that on the subject there is 6.5ha well suited for vineyard production and another 5.4ha that may be developed for vineyards but with higher risk and/or lower quality (see Appendix 3 Viticulture Suitability Map). However, irrigation water (say 25ML) would need to be sourced to realise this potential. The most likely source is from the adjacent landholder to the SW, who holds 150ML Irrigation Rights from the Scheme. However, Dr Wells notes that the land is not considered a particularly great site for vineyards.</i></p> <ul style="list-style-type: none"> ▪ Whether the subject land could be farmed in conjunction with land in the vicinity to be able to contribute to a commercial scale agricultural activity. <p><i>It is noted that a productive agricultural enterprise occurs on the subject title with an estimated gross margin of approximately \$18,000 on the subject land (\$900 x 20ha). The Gross Margin of an enterprise is a commonly used indicator of its relative 'profitability' and is calculated as the margin between the Gross Income and the Variable costs of that enterprise.</i></p> <p><i>As such, the Gross Margin represents the funds available to meet the Overhead Costs of the business, the interest and capital requirements, and provide a return for the business owner. Variable costs are generally around 33% of Gross Income. This assumes that the gross income of the enterprise would be approximately \$30,000. In our opinion, this represents a hobby scale activity (As defined by RMCG 2022 in Enterprise Scale for Primary Production in Tasmania).</i></p> <p><i>Land with hobby scale characteristics could be appropriately zoned Rural or Agriculture depending on the capacity to be farmed in conjunction or contribute to commercial scale operations.</i></p> <p><i>The subject land is directly adjacent to other land with commercial scale characteristics utilised for grazing (land to the SW), however, the presence of the existing dwelling reduces the potential, somewhat for the subject land to be farmed in conjunction with this adjacent land for livestock grazing.</i></p> <p><i>The subject land is well connected to Jinglers Creek vineyard to the north. With the addition of 6.5ha well suited and 5.4ha possibly suited for vineyard production and a feasible water resource it has commercial scale characteristics (As defined by RMCG 2022 in Enterprise Scale for Primary</i></p>

REPRESENTATION MAIN POINTS	RMCG COMMENTS & RECOMMENDATION
	<p><i>Production in Tasmania). However, Dr Wells notes that the Jinglers Creek vineyard is a relatively minor contributor to the final scale of operation.</i></p> <p><i>The subject land is well connected to the adjacent title CT 101202/4 - 44ha to SW, which is farmed in conjunction with CT 101202/1 – 44ha and has 150ML Irrigation Rights from the North Esk Scheme. CT 101202/4 is connected to CT 129000/2. CT 129000/2 forms part of a vineyard holding with commercial scale characteristics. Hence, there is some potential for the 7-8ha of land that is suitable for vineyard production to be farmed in conjunction with a vineyard with commercial scale characteristics and access to irrigation water. In addition, CT 101202/4 may have land suitable for vineyard production.</i></p> <p><i>However, the circumstances (land is not contiguous with an existing commercial scale vineyard, no existing water resources, the combined land and water resources for a commercial scale operation would be under three different ownerships, the presence of an existing dwelling), reduces the feasibility of the subject land being farmed in conjunction to be able to contribute to a commercial scale agricultural activity.</i></p> <p>In addition, when considering the subject land against the Decision Rules the following rules are relevant:</p> <ul style="list-style-type: none"> ▪ Minimum of three titles (where feasible) to make a zone ▪ Individual or small clusters of mapped potentially constrained titles to be zoned Ag if surrounding adjacent land use has commercial scale characteristics or is mapped as Unconstrained in the ALMP. <p>In this instance only the land to the west is mapped as unconstrained by the ALMP and the adjacent land to the SE is Potentially Constrained 2A, and to the NW Potentially constrained 2B. Relbia Road forms a clear delineation between Rural Living to the NE and Agriculture.</p> <p>The Planning Report suggests that if the subject land was zoned Rural Living, then it would create consistency with the balance of the title and surrounding development pattern. However, in this instance it is important to preserve the agricultural capacity of the adjacent Irrigation District and</p>

REPRESENTATION MAIN POINTS	RMCG COMMENTS & RECOMMENDATION
	<p>agricultural activity in proximity with commercial scale characteristics (to the SW and further SE – i.e. not immediately adjacent, but one title removed.</p> <p>Bases on these factors, this title could be considered for the Rural zone. And if considered for the Rural Zone then a surrounding cluster including the three titles to the south and east and the Jinglers Creek vineyard title to the NW should also be considered for the Rural zone. This would form an effective buffer between the Rural Living zone and the Agriculture zone.</p>

APPENDIX 3: VITICULTURE SUITABILITY MAP



This map is a GeoPDF. Use the Avenza Maps app on iOS or Android devices to overlay your location.

This report has been prepared by:

RM Consulting Group Pty Ltd trading RMCG

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Document review and authorisation

Project Number: #1449

Doc Version	Final/Draft	Date	Author	Project Director review	BST QA review	Release approved by	Issued to
1.0	Final	29/03/22	M. Tempest	A. Ketelaar	B. Gravenor	A. Ketelaar	I. More

Representation 24 - Further Consideration

Representor: Michelle Schleiger - Woolcott Surveys
Property: 299 Relbia Road, Relbia (CT 122876/1)

Property:

299 Relbia Road, Relbia is a 35.67ha lot that is currently split zoned into Rural Resource and Rural Living. The draft LPS proposes to split zone the property Agriculture and Rural Living B.

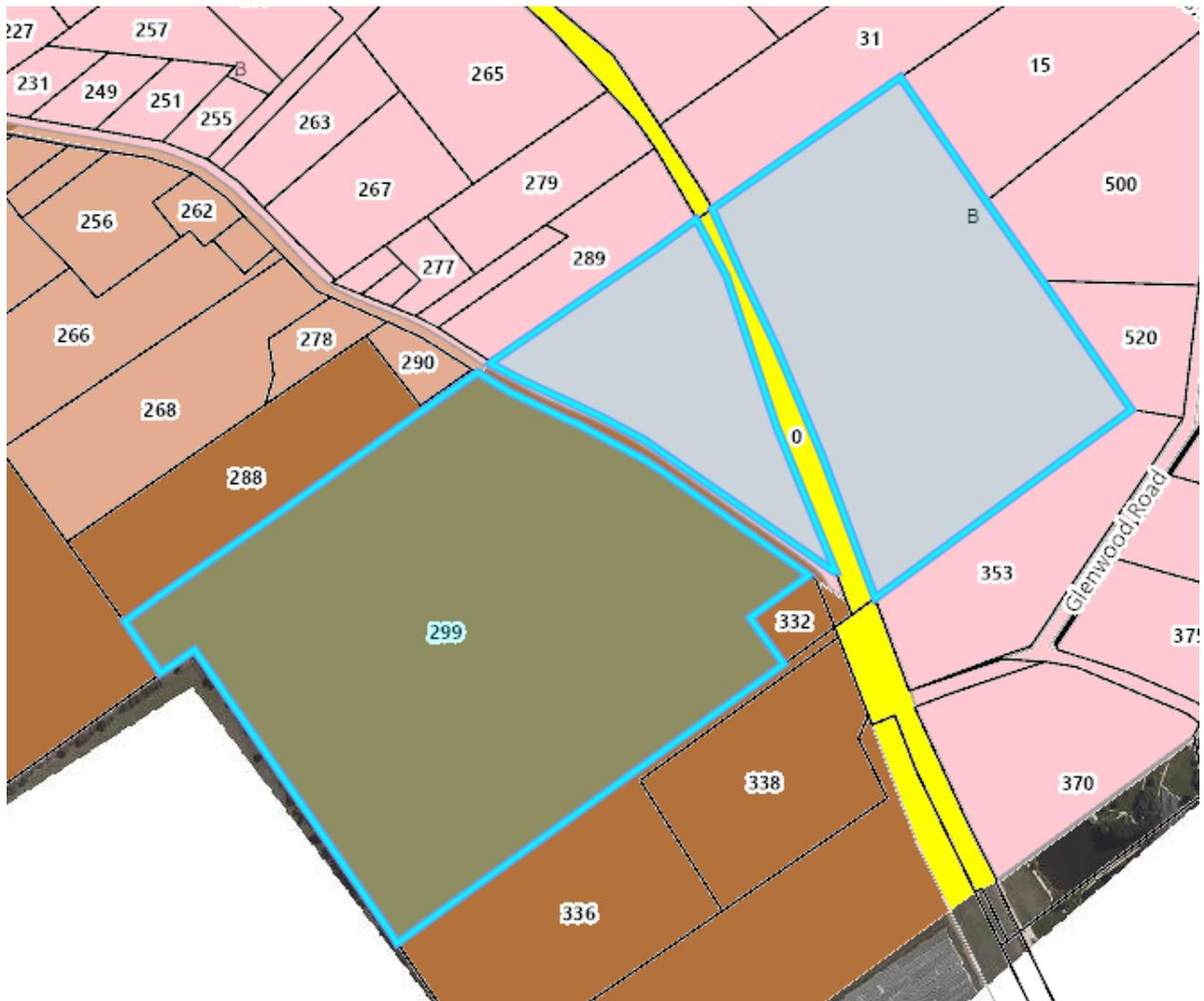


Figure 1 - Proposed Zoning (Source: COL GIS SAM Mapping)

Background:

Council received the representation requesting that the site in question be considered for either Rural Residential or Rural. The representation was extensive and also contained an Agricultural Assessment prepared by Pinion Advisory.

Section 35F Report:

In Council's section 35F report the conclusion was that the site remain within its Agricultural and Rural Living zonings as advertised. The report did not consider the requested Rural zoning.

Post Submission:

Post submission Council was contacted by the representor seeking clarification on why the Rural zoning was not considered. This appears to be an omission by Council. Following contact, Council engaged RMCG to provide a review of the representation and make comment (Attachment A). The report concluded, based on its findings, that the title could be considered for Rural zoning. It further noted that if rezoned to Rural, then several surrounding properties should also be considered to the Rural zone.

Conclusion:

Based on the information provided by the representor, as well as advice from RMCG, it is recommended that the site be rezoned to Rural.

The representation is due to be considered on Day 4 of the hearings, between 10.00am and 1.00pm on 12th May 2022. Council are requesting the zoning of Rural be considered for the subject site, and potentially the surrounding sites, based on the evidence provided.

A handwritten signature in black ink, appearing to read 'Iain More', written in a cursive style.

Iain More
TOWN PLANNER - CITY OF LAUNCESTON
12/04/2022