

6 July 2023

J C & G D Dennett
675 Cradle Mountain Road, Erriba

The General Manager
Kentish Council
69 High Street
Sheffield
TAS 7306
By email: submissions@kentish.tas.gov.au

Subject: Representation on Kentish Draft LPS – John and Gail Dennett

Attention: Kentish Planning Authority

We are the owners of 'Erriba Rise', 675 Cradle Mountain Road (PID 6494195, CT 202205/1) in the Kentish municipality. In the Draft Local Provisions Schedule our 30.6 ha title has been zoned from Rural Resource to Agriculture.

We consider that our title be split-zoned to align with areas potentially suitable for agriculture, and areas where agriculture is restrained in accordance with Guideline AZ5 in the Tasmanian Planning Commission's Guideline No. 1 Local Provisions Schedule of June 2018 under S8A *Land Use Planning and Approval Act 1993*. We consider that the Landscape Conservation Zone is more appropriate for the bulk of the forested part of our property, totalling 24.825 ha with the non-forested and lightly forested part containing 5.775 ha ('upper part') to remain Agriculture for the following reasons:

- A. Our property contains the 20.3 *Erriba Reserve* protected by conservation covenant which covers 66% of the title. The land to the southeast of the line a-e on the attached map¹ which we consider should be Landscape Conservation Zone includes the covenanted area of 20.3 ha plus an additional 4.525 of forested, wetland and open grassland.
- B. The covenanted area is in three parts: heavily forested steep (descending up to 250 metres to the southern boundary) slopes, a basalt columnar cliff line and a perched wetland. The total area is devoid of grass covering and has no road access. It has never been used for agriculture and up until 30 years ago when most of the upper part was stocked, the two areas were fenced along the escarpment edge.

¹ The attached map has been created to simplify the proposed division line between the two proposed zones. The north-western covenant boundary is mostly jagged and follows the cliff line and perched wetland which have specific nature conservation values referred to in the Nature Conservation Plan for Erriba Reserve held by the Private Land Conservation Program in the Department of Natural Resources and Environment.

- C. The remaining upper part of the property being 5.775 ha of mostly cleared land to the northwest of the line a-e on the attached map is used for agriculture and contains residential buildings, two small dams, a bore, roads, and sheds. The area has been used for vegetable and berry cropping, grazing, fodder storage and native grassland seed trials.
- D. Split zoning is justified as there is a clear demarcation of land uses within the title and the zone bounds are readily defined by the following grid points on the attached map:

	Latitude	Longitude
a.	-41.433461	146.131567
b.	-41.433142	146.133048
c.	-41.43260	146.134802
d.	-41.433602	146.137140
e.	-41.431684	146.139190

- E. The covenanted land on our property adjoins the 15.9ha Conservation Area on Crown Land to our east and through this is further connected to another property PID 7330707, CT 244488/1 which contains a 13.2 conservation covenant being *Noonameena Wilmot Reserve*.
- F. Apart from Crown Land being an unused reserve road and public reserve PID 2102895 (formerly Quarry Reserve 1662), both of which are untitled and unsurveyed and both of which sit wholly within the western fence line of our property, the western boundary of our property adjoins 705 Cradle Mountain Road, Erriba, PID 2256958, CT 140068/2 which contains a 10.0 ha conservation covenant being *Erriba #2 Reserve*. That part of our property which adjoins the western boundary is non covenanted forested land which is indistinguishable in vegetation from the two covenanted and forested areas in CT 140068/1 and CT 202205/1. By including that part of our land in the Landscape Conservation Zone the two properties referred to in E. above and *Erriba Reserve# 2* would be linked.
- G. The three private properties and the Conservation Area contain and provide habitat for several State and Federally listed threatened species. The full details of the natural values being protected are listed in the Nature Conservation Plans for the three properties held by the Department of Natural Resources.
- H. None of our property appears in the Land Potentially Suitable for Agriculture Layer (ALMP Mapping Layer 2) but most of the land proposed for retention in the Agriculture Zone including the level cleared land was included in the Potential Agricultural Land Initial Analysis (ALMP Mapping Layer 1). Conservation Landholders Tasmania will provide more detailed evidence in its representation in support of the rezoning of the three covenanted titles including ours.

The case for rezoning to Landscape Conservation is consistent with the Tasmanian Commission's interpretation of Guideline No 1 posted on the Planners Portal on 22 April

2021 which recognised the planning merit of rezoning titles forming a large area. In that same advice the Commission acknowledges that covenanted land invariably contains values that make it suitable for zoning as Landscape Conservation.

Could you please acknowledge receipt of our representation?

Yours Sincerely
John & Gail Dennett
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Attachments:

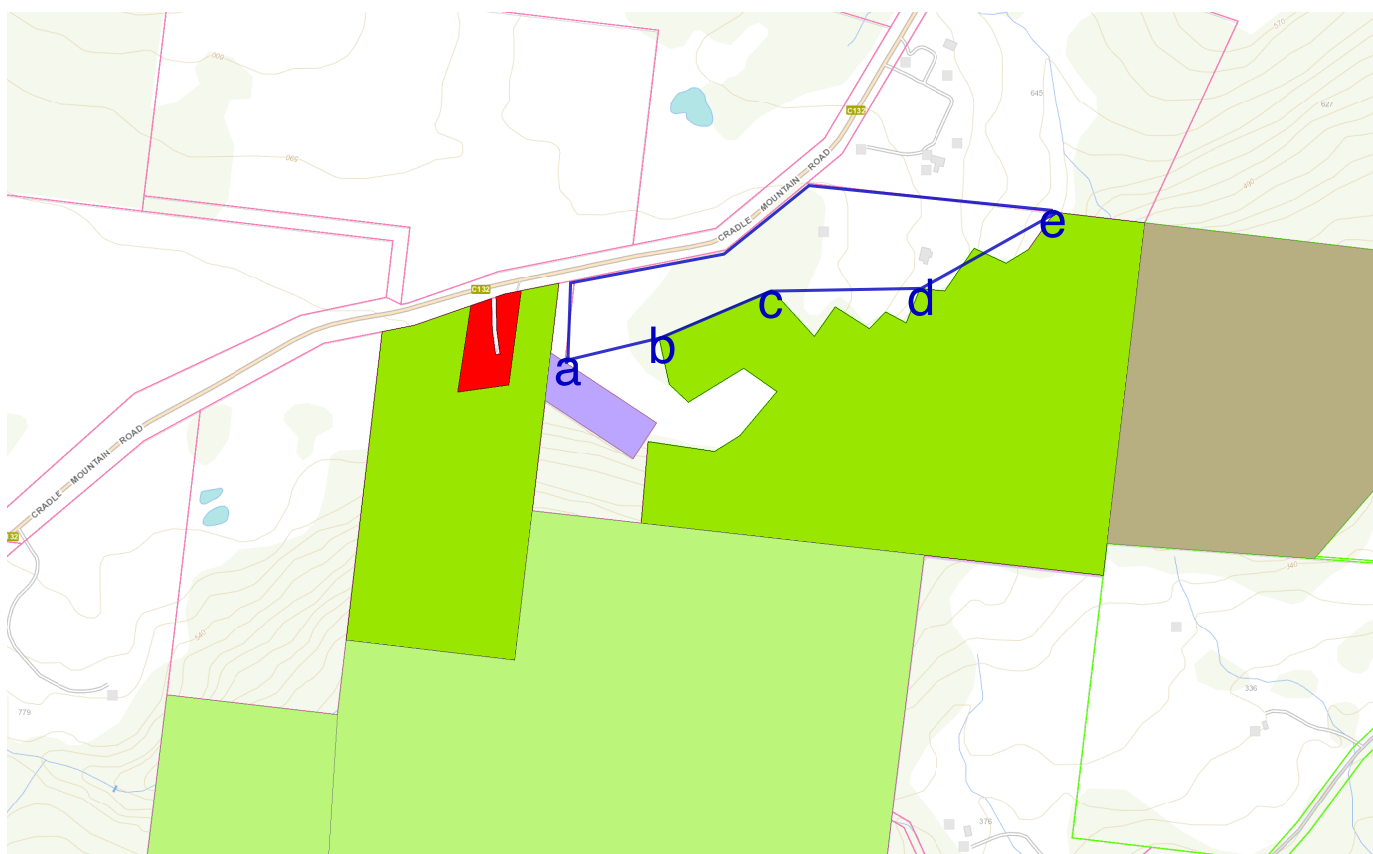
1. The attached map referred to in footnote 1 on page 1 drawn on the list map.

Listmap

www.thelist.tas.gov.au

Generated at: 5:49 on 18-June-2023

User: Public



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