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Representation on Tasmanian Planning Scheme
Draft Meander Valley Local Provisions Schedule

This representation primarily is concerned with the ‘**Particular Purpose Zone-Larcombes Road**’ for the area at the far end of Larcombes Road, Reedy Marsh, which is contained within the Draft Meander Valley Local Provisions Schedule of the Tasmanian Planning Scheme.

I welcomed in 2013 the Meander Valley Council’s rezoning of my land to the new category of Environmental Living Zone. My land was originally in the Rural Zone of the 1995 Scheme and then became the Rural Resource Zone in the PAL amendment of 2007, despite my objection. I have supported this ELZ residential rezoning on several occasions in drafts, interim drafts, and still more drafts since 2007.

My land is currently within the Environmental Living Zone of the Meander Valley Interim Planning Scheme 2013 (MVCIPS).

I welcomed also the reviewed sections of the Northern Regional Land Use Strategy, which included revised strategy for Rural Living and Environmental Living, done in 2013 I recall. The Version 6 of the NTRLUS specifically is supported as is previous versions but as for any subsequent versions, they are simply malfeasant rubbish.

This representation supports the PPZ-Larcombes Road Zone and acknowledges that whilst some of the issues, indeed several have been addressed by Meander Valley’s senior planner that I remain unconvinced that this PPZ will have a smooth transition to finalisation. Thus the substantial largely supporting justification, includes an alternate name of the PPZ as well as some other suggestions intended to improve the zone.

The Particular Purpose Zone is the zone containing my three titles, CT/221026, CT/204936 and CT/134752, which are currently zoned Environmental Living (ELZ) at Reedy Marsh within the Meander Valley Interim Planning Scheme 2013.

I am tending my thoughts regarding the plethora of problems, which the Tasmanian Planning Scheme provides for any development opportunity for properties currently zoned Environmental Living at Reedy Marsh. I would hope that out of a consideration of those the

PPZ would represent an opportunity to move beyond the Environmental Living Zone standard.

Council has stated in its FACT SHEET, Making a Representation to the Draft Meander Valley Local Provisions Schedule:

“Local planning rules are applied through a Particular Purpose Zone, Specific Area Plan or a Site Specific Provision and the justification required under the Act to demonstrate why these rules should be included is an important factor.

Section 32(4) of the Act only allows for these provisions if:

- it relates to use or development that is of significant social, economic or environmental benefit to the State, region or municipal area; or*
- the area of land has particular environmental, economic, social or spatial qualities that require provisions that are unique to that area of land.”*

I am therefore providing a representation which describes relevant considerations within such a justification and which, as well raises a number of minor issues including over allowable development and various standards and thirdly deals with the issue of an alternate name for this Particular Purpose Zone.

Some people, probably with limited planning expertise, artificially prevented the current Meander Valley Interim Planning Scheme 2013 from translating into a finalised planning scheme.

Instead, the Tasmanian Government has unilaterally engineered a new state-wide planning scheme under the dishonest mantra of “Fairer Faster and Cheaper”. Those claimed benefits are strongly disputed and in any case not necessarily in keeping with LUPAA Schedule 1 objectives. This I argue represents what can only be considered to be a dark age of land use planning in Tasmania.

However, of specific relevance in engineering the Tasmanian Planning Scheme, The Tasmanian Government (Minister Gutwein) failed to ensure there is a land use zone, which allows a reasonable, fair, translation for the Environmental Living Zone within Meander Valley’s current Interim Planning Scheme.

The Environmental Living Zone is a zone established within the state planning template, supported by Regional Land Use Strategies, which were the product of years of substantial community consultation and incorporated into many of the Interim Planning Schemes (IPS) across the State.

The Liberal Government made a unilateral, so-called policy decision to remove Environmental Living Zones in about 2014 without consulting the community in any way. They had made up their own minds. As a participant in the RMPS, I, as a consequence, remain disaffected and aggrieved.

The Environmental Living Zone (ELZ) at Reedy Marsh, significantly, is (for over 80% of the area) delineated and enhanced by private covenanted land, protected under the Nature Conservation Act, (a part of the RMPS) mostly supporting the Tasmanian Regional Forest Agreement (RFA). My property supports two in-perpetuity conservation covenants registered on my three private land titles in Reedy Marsh.

Reedy Marsh landowners, working with the DPIPWE, designed the conservation covenants across the ELZ, created under the Private Forest Reserve Program (PFRP), The Forest Conservation Fund (FCF) or the Protected Areas on Private Land program (PAPL). The conservation covenants across the ELZ reflect a combination of existing uses, together with modest planned extensions and expansions of existing Use and nature conservation.

Significantly, the residents within the zone have supported the current ELZ at Reedy Marsh. One could say strongly supported but this will be shown in the coming months in any case.

In Meander Valley, the most succinct amalgam of covenanted titles occurs in the area down the end of Larcombes Road in Reedy Marsh. It is not the only amalgam but it is the most coherent one. There are other spatial amalgams of conservation covenants, which deserve some sort of planning recognition in the scheme. Some of those will be discussed in a representation from The Environment Association.

NB: The cleared area down Larcombes Rd was the original Reedy Marsh area dating back to the 1840s or so. Now the modern Reedy Marsh area generally is a location name, which has subsumed the historic areas of Willowdale and Lower Meander, both closer to Deloraine, to become quite a sizeable tract of land.

The modern Reedy Marsh (RM) area generally, that is the overwhelming numerical predominance of titles, has long been favoured for Rural Residential development but there are other land uses zoned in Reedy Marsh as well, including Environmental Living. Reedy Marsh is probably the largest rural residential (Zoned Rural Living) area in Meander Valley.

The distinct and separate area of Reedy Marsh which is currently zoned as Environmental Living Zone contains several properties, which are a particular form of what may superficially be considered 'rural residential' but with an in-perpetuity conservation covenant focus that is Environmental Living and is expressed with a spatial design of a lower overall density of habitation. In fact, there are almost no rural (agricultural) activities in the Reedy Marsh Environmental Living Zone of any sort. In general old historic cleared land is reverting and this is considered to be a good thing.

'Rural Living' is a term, which invokes a lifestyle of living in the rural landscape in a rural residential context outside of the urban growth boundary on larger lots but generally smaller than in the Rural Zone or the Agriculture Zone.

Many rate payers who have such land pursue rural activities on a lifestyle basis including management of livestock and other rural pursuits on a small to medium scale.

In the UK, this particular land use is referred to as 'small-holdings'. But this is a broad church with a wide range of activities and amenities. Importantly I assert 'Rural Living' is not synonymous with 'Environmental Living', especially where the landowner becomes also a reserve manager of an in-perpetuity, secure conservation reserve.

The History of the Reedy Marsh Environmental Living Zone Area

Several residences in the current Environmental Living Zone (due in the draft LPS to become the Particular Purpose Zone – Larcombes Road) area of Reedy Marsh date back to the 1960s and 70s and were built by new settlers of that era. From those times there was always a strong ethic of caring for nature. The buildings reflected the times but were mostly situated privately, set a very long way back from the public access road, achieving great privacy. Most of those 1960s and 70s buildings survive today.

Prior to the 2013 Meander Valley Interim Planning Scheme, in the original version of the Meander Valley 1995 Scheme (MVPS), the area at the end of Larcombes Road was zoned as either Low Density Residential or Rural. That was at a time when places which were obviously residential in nature were zoned otherwise by Council's planner at the time who was also, as it turns out, a Gunns' shareholder.

The State's Protection of Agricultural Land (PAL) Policy then caused a planning amendment in about 2007 to the MVPS 1995 with attendant massive community outrage and opposition, especially from Rural Residential landowners, when it was forced upon the community by the RPDC's operatives.

Council's Senior Planner, at the time of the PAL Policy MVC planning scheme amendment, honourably and in good faith made commitments over the Rural Residential areas of the Municipality.

My view is that the Senior Planner at Meander Valley Council has long and diligently worked to deliver, including the latest MVC IPS 2013 Amendment 4/2015, which is fairly claimed to be in line with the NTRLUS. That is both acknowledged and appreciated. That Council effort included the current Environmental Living Zone.

Conservation Covenants Background

Conservation covenants are binding agreements, made voluntarily between a landholder and the state government, to protect and enhance the natural, cultural and scientific values of a piece of private land. They can apply to all or part of a property and are registered on the title of the land and generally are intended to remain in force in-perpetuity.

Significantly, often such high conservation values are found as a priority on private land and in general it is private land, which has a greater extent and a higher number of high conservation biodiversity values in Tasmania. As you know the conservation covenants, which are currently supported by Council, are binding on subsequent owners of the land on which they are registered.

A covenant is a promise contained in a document under seal. Such a promise is enforceable on the basis of privity of contract. The Minister administering the Nature Conservation Act is the dominant tenement. There are remedies if a covenant is breached. Covenants are hard to remove once placed on a title and most are in-perpetuity.

The standard covenant under the Tasmanian Nature Conservation Act provides a specified range of obligations to the owner of the private reserve. These may vary from one reserve to another but are all clearly articulated and enforceable. There is a rigorous approach to nature conservation and considerable time and individual negotiation is involved in establishing each Covenant with the consequence that conservation covenants have substantial resilience and integrity. They have a planned approach to the management of the subject land and can include differing covenant zones which assist municipal planning in land use terms.

All conservation covenants on title under the Nature Conservation Act in the Reedy Marsh ELZ are in-perpetuity. That is, they are more durable than planning schemes, planning strategies and at the very least are at least as permanent as State Policies, but in truth probably more so. And quite likely the covenants are more durable than Local Governments themselves.

Some conservation covenants bind most or the whole of a title and some bind only a portion. In Reedy Marsh ELZ the covenants usually protect the vast majority of the land. All

but one covenant would require both Commonwealth and Tasmanian government agreement for a revocation.

The Nature Conservation Act is, at least in theory, a part of the Resource Management Planning Scheme and as such, shares some important common objectives with the Land Use Planning Approvals Act.

Further, every covenant in the 'PPZ-Larcombes Road' (the current RM ELZ) has a Management Plan attached to the Covenant, these are termed either Operations Plans or Nature Conservation Plans, depending on the time when the covenant was created. This management plan ensured an additional level of planning which is attached to the in perpetuity covenant. The additional planning which is enshrined is both important and a relevant consideration for the Local Government Planning Scheme and for the zone provisions in this case the 'PPZ-Larcombes Road' area. The Management Plan can be modified and updated by the Minister.

Both the Covenant and the Management Plan limit the range of activities which can occur on the land. In the case of the current RM ELZ, the aggregate of those permissions or restrictions should be a relevant consideration for the provisions, the standards and purposes of any Particular Purpose Zone (PPZ) in the Meander Valley Local Provisions Schedule of the Tasmanian Planning Scheme (TPS).

MV Council's NRM Officer has been given a copy of all the covenants and plans, a necessary requirement to be lodged with Council to qualify for the MVC Rates Rebate Scheme.

The range of activities which are permitted on the land under the covenant have been negotiated by each landowner and thus vary from title to title, covenant to covenant. The conservation covenants are not a standard one size fits all document. Additionally there are differences between PFRP, FCF and PAPL covenants. This complexity exists but significantly does not negate any overall land use purpose which is common to the suite of covenants down Larcombes Rd in Reedy Marsh.

With the exception of the Russell block, at 531 Larcombes Road Reedy Marsh, CT Volume 213657 folio 1, all conservation covenants in the current RM ELZ were established and operational before the Meander Valley Interim Planning Scheme 2013. That is they all predate the Scheme.

I assert that the covenant aspect of the current Reedy Marsh ELZ has the effect of lowering and removing land use conflict and that this is an important aspect of the Zone which would translate to the MV LPS through the 'Particular Purpose Zone – Larcombes Road'.

To devote land for in-perpetuity conservation rather than economic gain is a significant private landowner donation to future generations. This intergenerational aspect is one which local government has a role in supporting. The RMPS also supposedly supports intergenerational equity.

I have long been an advocate of private land conservation and reservation. Indeed within Meander Valley, it is surely without dispute there remains much that remains to be done in terms of stemming the decline of nature, protecting the natural environment and securing native species for future generations. This problem for the survival of nature and for any claim of sustainable development is exacerbated under the Tasmanian Planning Scheme which has many deficiencies.

In-perpetuity conservation covenants on private land in Tasmania are a part of the National Reserve System of Australia, which in itself deserves to be supported by local government.

“The National Reserve System is Australia's network of protected areas, conserving examples of our natural landscapes and native plants and animals for future generations. Based on a scientific framework, it is the nation's natural safety net against our biggest environmental challenges.

The reserve system includes more than 10,000 protected areas covering 17.88 per cent of the country - over 137 million hectares. It is made up of Commonwealth, state and territory reserves, Indigenous lands and protected areas run by non-profit conservation organisations, through to ecosystems protected by farmers on their private working properties.”

The next 20 years will be a critical period for biodiversity conservation in Australia. Now is not the time for Council to distance itself from nature conservation.

Finally it should be recognised by Council that managing land for conservation is a valid land-use activity requiring time, energy and private resources and yet generally for most rate paying covenant owners their conservation reserves do not provide an income which offsets that loss, which may likely have been avoided or mitigated through development.

It is undeniably a Public Interest for private land owners to be involved in permanently conserving important elements of nature on private land. It is a feature of this area.

That philosophy is reflected too in the community work done at the time leading up to the RFA to create what is now the Reedy Marsh Conservation Area. Such a public interest formula which is expressed across more than one planning scheme zone should have strong Council support via a range of mechanisms including land use planning.

Tangible local government planning support for private land owners who have jointly committed their land to the in-perpetuity conservation of nature, priority vegetation and threatened species in a logical spatial pattern at Reedy Marsh, in our municipality, is welcome, competent and will become more important, as other philosophies and the greed based Tasmanian Planning Scheme takes effect.

Particular Purpose Zone – My Preferred TPS Planning Option

I favour a Particular Purpose Zone be established over the current ELZ area of Reedy Marsh. I have a number of reasons for choosing this option. Much of the remainder of this paper explores reasons and relevant considerations that have lead me to this conclusion as being the most suitable for the current ELZ area.

It must be said that I do not support using the reconfigured SPP Rural Living Zone (RLZ) (D standard) as a replacement for the current Environmental Living Zone of the MVC IPS 2013.

I understand the Particular Purpose Zone approach:

“Requires a unique or tailored approach and the s.32(4) justification: - is of significant social, economic or environmental benefit to the State, region or municipal area; or - area has particular environmental, economic, social or spatial qualities that require unique provisions.”

The current Environmental Living Zone (ELZ) area of Reedy Marsh, (down the end of Larcombes Rd) is obviously and distinctly different to the area zoned as Rural Living (RLZ) elsewhere in Reedy Marsh.

The current ELZ does have different Planning Scheme standards to the RLZ, elsewhere in RM, including the upcoming TPS SPP RLZ standards or even any of the MVC's SAP modified RLZs.

The physical ELZ area itself has a higher degree of both aesthetic and biophysical naturalness, not only when compared with the RM RLZ zone, but when viewed with other RLZ zoned areas in the MVC area. Council has an appalling record of ignoring scenic landscape values and scenic landscape protection. It is indeed a pathetic record.

Because virtually all the properties within the current ELZ are covenanted, the ELZ also has different biodiversity (covenant management) standards to the RLZ planning scheme ones (such as may apply in the IPS 'Priority Habitat (Biodiversity) Overlay' currently).

One can see from the variously zoned landscape of Reedy Marsh, the change in the degree of vegetation retention of important elements of the landscape between the four different zoned areas within Reedy Marsh, being the ELZ, the RLZ, the Environment Management Zone (EMZ) and the Rural Resource Zone (RRZ). This can be shown by way of reference to the RFA's Biophysical Naturalness mapping of 1996, compared with today. This mapping can be shown to Council and the Tasmanian Planning Commission.

Although there is a couple of covenants within the RLZ area of Reedy Marsh, the predominant approach to managing land in the RLZ remains, in the main, not consistent with a covenanted title.

There are residents in the RLZ of Reedy Marsh who see little difference between the two (residential zoned) areas (the RLZ and the ELZ) but those people, all too often after being appraised of the conservation covenant schemes, rejected it or even made pejorative comments over it. By contrast I have not heard a single comment from even one covenant holder of the current ELZ in RM, who is unhappy or disdainful of their conservation covenant/s. At least two landowners went through the process twice. There is a very high level of acceptance of managing the land here for nature conservation purposes in conjunction with sympathetic living functions.

The current Reedy Marsh ELZ area has a lower density of dwellings and human occupation than the RLZ of Reedy Marsh. There are fewer large or even moderate areas of cleared land in the ELZ than the RLZ of Reedy Marsh (RM). The titles in the ELZ are, on balance, larger. Nor can they be subdivided to the new standards set out in the newly fabricated TPS SPP RLZ (D), which I view as not even suitable for Reedy Marsh anyway.

The current ELZ area of Reedy Marsh, now proposed to be the 'Particular Purpose Zone-Larcombes Road' under the draft LPS, starts at 335 Larcombes Rd and ends at 780 Larcombes Rd, stretching over a distance of 4.5 kms.

The 'Particular Purpose Zone-Larcombes Road' area occurs across the catchment divide between the Rubicon and the Meander Rivers, thus including catchment headwater areas.

The 'Particular Purpose Zone-Larcombes Road' area is enveloped by, and the private land intricately abuts and intertwines with, the Reedy Marsh Conservation Area (RMCA), a secure reserve on public land, currently zoned Environmental Management Zone (EMZ).

The boundary between the two planning Zones (i.e. 'Particular Purpose Zone-Larcombes Road' and EMZ) represents a complex interface with many boundaries. Virtually all private titles within the 'Particular Purpose Zone-Larcombes Road' share common boundaries with the RMCA public reserve, which makes up the whole of this EMZ. Indeed the SE section of the 'Particular Purpose Zone-Larcombes Road' shares the whole or part of 22 property

boundaries with the EMZ and in the NW section of the 'Particular Purpose Zone-Larcombes Road' there are 15 common boundaries with the EMZ.

I would assert that the 'Particular Purpose Zone-Larcombes Road' area of RM potentially would assist the management of the Environmental Management Zone and therefore the Reedy Marsh Conservation Area, managed by The Parks and Wildlife Service, especially if the 'Particular Purpose Zone-Larcombes Road' continues to attract sympathetic landowners. One attracts sympathetic land use by having sound provisions and objectives and so forth as well as appropriate zoning. I argue the 'Particular Purpose Zone-Larcombes Road' is an appropriate zone.

Special Amenity

The amenity of the 'Particular Purpose Zone-Larcombes Road' is special. It has high aesthetic and biophysical naturalness. The aesthetic and biophysical naturalness of unprotected private forests all across the municipality is being ravaged and diminished.

It can be shown that other zonings under the MVIPS 2013, as well as previous schemes, have allowed the Use of land to diminish both the biophysical as well as aesthetic naturalness. Governments pay lip service to notions of sustainability.

People owning land in the 'Particular Purpose Zone-Larcombes Road' (PPZ) at Reedy Marsh support retention of the natural values of this area, as well as more broadly. This decision does not mean a donation of 100% of their land as National Park. Hence, this PPZ is structured to allow some development in keeping with the existing amenity.

Evidence of a Residential Use in Harmony with Nature Design Purpose

A perusal of the covenanted areas across this PPZ at RM shows a nuanced range of approaches with regard to how Residential Use is accommodated. The landowners, Hawkes, Hoffman and Ricketts have all incorporated areas specifically designed to cater for residential development within the reserve covenant structure and plan. That approach is supported by the PPZ, which has been designed separately by MVC.

Other private owners in the PPZ have also, if to a slightly lesser extent, but also obviously by design have set-aside land, excluded entirely from reservation, but clearly intended for domestic purpose. This includes Howard, Russell, Woodward, Hawkes, Hoffman and Ricketts. It is hard to conceive or perceive the covenant exclusion areas, which can be seen spatially on the map, were suitable for any other purpose than a low impact domestic living one. It is hard to conceive of any other possible use in the main for such areas.

Hoffman, Hawkes and Ricketts do have some additional cleared land excluded from covenant which may exceed the domestic residential requirement of the Bushfire Code but in all cases these relatively isolated and modest sized areas of old, historically cleared, former farmland are not being used commercially and were only ever developed and used on a mostly subsistence basis. The low mapped and actual land capability of Reedy Marsh, especially in the PPZ, would support the general decision of current residents to not try to rely of such land for an income from agriculture. That supports the claim that it is not RLZ land.

Spatially the land within the PPZ-Larcombes Rd falls within two clusters or enclaves, around a narrow neck of public reserved land, - the Reedy Marsh Conservation Area (RMCA). Hence, it is critical to consider the surrounding land use and zoning of the ELZ.

The zoning applied to the Reedy Marsh Conservation Area (RMCA) is the Environmental Management Zone. The RMCA is a secure conservation reserve under the Nature Conservation Act on public land. Thus in this location of Reedy Marsh there is a substantially sized homogenous, largely natural, securely protected area, dedicated mostly to nature conservation, with what should be two compatible uses in two Zones.

Sadly, it has to be said, the RMCA managed by the Tasmanian Parks and Wildlife Service has no Statutory Management Plan, nor in fact any management plan at all. Importantly, it must be noted that all private covenanted blocks in the PPZ by comparison have a management plan (termed either an operations plan or nature conservation plan) and DPIPW is meant to review those plans every 5 years.

There is only one block of land within the ELZ at Reedy Marsh, which does not have a covenant, but is instead a Land for Wildlife title. The two previous owners have expressed interest in having a covenant also and the land has just changed ownership. This land also has high conservation values and is also managed for conservation beyond its residential curtilage.

In Reedy Marsh, the 'PPZ-Larcombes Road' area contains 11 titles and 9 covenants. The 'PPZ-Larcombes Road' is significantly more remote from the town of Deloraine than the Rural Living Zone elsewhere in Reedy Marsh. This is another point of difference.

Importantly, there remains within the 'PPZ-Larcombes Road' small portions of private land which is not within the conservation covenanted areas of the various titles, that is, there is an amount of land which can be developed. This includes the more significant areas size wise on titles owned by Hoffman, Howard, Hawkes, Westley and Ricketts.

There remains within the 'PPZ-Larcombes Road' area a long standing presumption of residential use, partially recognised since 1995.

There is a significant justifiable difference between the 'PPZ-Larcombes Road' and other rural living zonings in Reedy Marsh or indeed elsewhere. The HCV values within the 'PPZ-Larcombes Road' area have already been identified and recognised, as well as firmly agreed to be protected in-perpetuity, between the owner and both the State of Tasmania and the Commonwealth. This almost 100% conservation development across the titles was recognised by MVC when it established the ELZ here. This 'PPZ-Larcombes Road' is the only such zone within the MV LG area.

One of the particular benefits of the 'PPZ-Larcombes Road' zoning is that it continues to legitimise, support and acknowledge that private conservation reserves do actually require day to day management and a caretaker presence. This is an unfunded activity in the public interest.

I argue it is very difficult to adequately manage a private reserve in absentia in Tasmania. An organisation might manage it to some extent but for mere mortals, being on site has unique and undeniable benefits.

Across the state of Tasmania there are now some 880 such private reserves covering some 110,000 Ha of land. A significant number of private reserves have owners who live on site and care for, as well as protect the land. Where such reserves do not have a caretaker presence, law breaking trespassers enter such land and often the result is illegal fire-

wooding, 4WD activity and other unsympathetic, illegal pursuits, degrading the natural values. As it is, there is a need to take a range of active measures to stop illegal trespass and most private reserves have signage on display. Such signage should be allowed in the PPZ without the need for a Permit.

Currently, in the Reedy Marsh ELZ, that is the 'PPZ-Larcombes Road' zoning, there are several titles with modest development, which would lend itself to more development within a sensitive context in the PPZ-Larcombes Road zone. This opportunity is discussed in a table below.

The PPZ-Larcombes Road, zoned area is not suited to many of the Permitted and Discretionary Uses allowed and listed in the TPS Rural Living Zone or the Landscape Conservation Zone either. **See the table of uses further on.**

The setbacks (esp. front setback) in both the current ELZ of the MV IPS and the current RLZ at Reedy Marsh were considered not appropriate for this area, if amenity is to be retained into the future in the 'PPZ-Larcombes Road' zone. That is they are considered to be too small.

Residents here, during the formation of the 'PPZ_Larcombes Road' zone, discussed further with Council a recommended setback distance and Council listened, establishing a much better distance of 50 metres front setback, which is roughly equivalent to that of the dwelling at No 505, being the one most closely built onto the public street. This house is visible from the street at that distance but some buffering vegetation is present. This building was built in the 1970s and does not have a formal Bushfire Code area around it but the owner has attempted such a modified zone.

My point is that in almost all cases, a considerably greater degree of setback than the IPS standard or the TPS standard, including the new 'PPZ-Larcombes Road' zone setback standard has been achieved down Larcombes Road, here in Reedy Marsh and very simply can be achieved into the future. It is a critical issue, which demands a unique approach. There is nothing to be gained by relaxing this standard. The new house at 335 Larcombes Road incorporated a generous front setback, well beyond the 50 metres, which nicely minimised its visibility despite other constraints. Such an approach as per No 335 protects privacy from passing traffic.

The discreet, unobtrusive siting of the properties' existing development (residences) is a very valuable and unique aspect of the amenity of the area which is better supported via the 'PPZ-Larcombes Road' zone than by any other.

Landscape Conservation Zone Considered and Rejected

The Landscape Conservation Zone (LCZ) would clearly be detrimental to my personal interests, as well as detrimental to the covenanted areas themselves because private land reserve management, which is fully privately funded and organised, would become marginalised through the economic pillaging the proposed LCZ's zone provisions would achieve.

The Landscape Conservation Zone (LCZ), if implemented, would make subdivision almost impossible, even though one of my in-perpetuity conservation covenants allows it. Further any house on any title within this unfair Zone would unfairly be Discretionary even when in accord with the existing covenants. Even though my land is 90% conserved and in fact at a policy level the proposed LCZ zone, without any public warning or State Policy, completely

and unfairly changed the current purpose of the ELZ residential zone, obviously and unjustly seeking to wreck the remaining current economic opportunity for people who have wisely and generously conserved nature.

In fact, in my terms the proposed Landscape Conservation Zone would completely gut our current Environmental Living Zone and would unfairly move the zone completely away from being a residential zone.

The proposed Landscape Conservation Zone provisions would unfairly make selling land for development much harder. Larcombes Road, Reedy Marsh is the only Environmental Living Zone in Meander Valley and so it is obviously unique, if for no other reason than that.

Let me be clear, I did not reserve my land by way of conservation covenant, which applies to about 90% of my land, to make a complete donation. What an obnoxious outrage this unfair TPS proposal would represent. I am not seeking to engage in speculation but I am not going to tolerate the nullification of virtually all commercial opportunity.

I argue strongly it is not fair or reasonable that the then Minister Gutwein covertly embed policy changes into the State Planning Provisions schedule of the TPS, when the planning exercise (for those who accept the TPS) should have been to more transparently translate the existing schemes into a state-wide one. This absence of a competent translation is not fairer. It is not as fair - rather less fair in fact.

The proposal seeking to destroy the Environmental Living Zone is against the Northern Tasmania Regional Land Use Strategy, (including Version 6 of May 2018), to which the current Minister signed his support.

The TPS has established a Landscape Conservation Zone (LCZ) under the TPS and intends some ELZ zoned land elsewhere in Tasmania would transfer into this new non-residential zone land. The Reedy Marsh ELZ area is not a good fit for this zone.

The height limit in the LCZ is lower and unreasonable, unduly restrictive and not needed or beneficial in the current RM ELZ. This is another reason for preferring the 'PPZ-Larcombes Road' zone.

The TPS Zone LCZ allows industrial forestry as a Discretionary development. This outcome and Use on the uncovenanted sections of land within the ELZ would degrade the area, diminish the value of the land and diminish the enjoyment and wellbeing of residents. The ELZ residents of RM generally have expressed an antipathy to forestry developments such that even the dumbest of politicians and bureaucrats could not fail to recognise the enmity and animus. The Conservation Covenants prevent and prohibit industrial forestry, so for over 80% of the land in the 'PPZ-Larcombes Road' zone it is outlawed anyway.

Even when a property is a developed one, this proposed unfair Landscape Conservation Zone would be highly likely to both harm land values and diminish the attractiveness of the area, market wise. It would not benefit our Municipality to drive down economic opportunity in the current Environmental Living Zoned area. Nor would it benefit the biodiversity values. The proposed LCZ zone has no merit whatsoever, in fact. The Landscape Conservation Zone is a gormless zone standard when compared to the context of the alternate 'PPZ-Larcombes Road' zone.

To deprive landowners of their few remaining basic rights to development, when they have in good faith and sincerely donated substantially towards the benefit of other species and our international biodiversity obligations by reserving their own land is grossly unreasonable

and offensive. To foist upon us such an un-transparent, adverse change as the Landscape Conservation Zone represents, is against the State's principles of sound land use planning.

Northern Regional Land Use Strategy and the Environmental Living Zone

The three Regional Land Use Strategies of Tasmania are the documents that supposedly underpin the Draft State Planning Provisions of the Tasmanian Planning Scheme, so they should have provided a considerable indication of community aspirations for land use in Tasmania. It would seem although there was a Liberal commitment to retaining the Strategies, they have been relegated to the diminished role of an inconvenient local truth.

The NTRLUS vision (In Version 6) 2018 identified for Northern Tasmania is:

“To create a region that through innovation and strong partnerships makes intelligent use of its natural advantages to create a positive, affordable and competitive future for all our communities.

By joining together, Northern Tasmanian councils and communities can create platforms for sustainable economic prosperity while maintaining our beautiful and unique environmental assets.

We will enhance the region's attractiveness as a place to live, invest and visit; and seek to enhance the quality of life for all both now and into the future.”

This regional vision has been in the NTRLUS until very recently.

I would, however, contend that currently the region appears unlikely to make a full and intelligent use of its natural advantages under a Tasmanian Planning Scheme. Indeed there remains no analysis of the worth or even a moderately complete appraisal of the extent or worth of its natural advantages. Nonetheless the use of intelligence regarding the use of natural advantages is intended in the NTRLUS.

Establishing a Particular Purpose Zone for Larcombes Rd area would be an intelligent response to the unintended consequences of the removal of the current ELZ at Reedy Marsh, when the IPS is replaced.

The Northern Tasmania Regional Land Use Strategy (NTRLUS) however supports the ELZ. Therefore the pathway to have a PPZ responding to the NTRLUS, in the demise of the ELZ but performing a similar function, would seem both a logical and desirable imperative were the Objectives of LUPAA and the RMPS to be considered. The opportunity arises in such a circumstance to improve on the existing IPS EL Zone.

The Minister's disrespect for the purpose of the ELZ is an anathema to sustainable, sound, fair and reasonable land use planning.

The Regional Land Use Strategy of Northern Tasmania Relevant Rural and Environmental Living Policies and Actions

Below I comment on whether the Reedy Marsh Environmental Living Zone (ELZ) (the one I live in and where my property is located) meets the Regional Land Use Strategy of Northern Tasmania (NTRLUS) (Version 6) for relevant policies and actions. I also comment on whether the policies are met using the draft Landscape Conservation Zone.

POLICIES

RSN-P21 Rural and environmental lifestyle opportunities will be provided outside urban areas.

Reedy Marsh ELZ meets the NTRLUS Policy RSN-P21, as the area is not urban. I consider that the Landscape Conservation Zone does not meet RSN-P21. The Minister has stated as much in the Explanatory document.

RSN-P22 Rural and environmental lifestyle opportunities will reflect established rural residential areas.

Reedy Marsh ELZ meets the NTRLUS Policy RSN-P22. This is a long established area. I consider that the Landscape Conservation Zone does not meet RSN-P22. The Minister has stated his intention to recalibrate the zone and thus it no longer serves the area, in which I live, in a reasonable manner.

RSN-P23 Growth opportunities will be provided in strategically preferred locations for rural living and environmental living based on sustainability criteria and will limit further fragmentation of rural lands.

Reedy Marsh ELZ meets the NTRLUS Policy RSN-P23, but noting that the term “rural lands” is not defined. I consider that the Landscape Conservation Zone does not meet RSN-P23 and indeed I argue growth opportunities are being closed down strongly and resolutely.

RSN-P24 Growth opportunities for rural living and environmental living will maximise the efficiency of existing services and infrastructure.

Reedy Marsh ELZ partially meets the NTRLUS Policy RSN-P24 in that it is sited down an existing long established Council maintained road and another road which has been in existence since the 19th century. Some blocks are connected to the electricity grid and some avoid such a service. Some blocks will be benefited by a communal water supply including for firefighting purposes.

ACTIONS

RSN-A19 Rural living land use patterns will be identified based on a predominance of residential use on large lots in rural settings with limited service capacity that are outside urban areas.

Reedy Marsh ELZ fully meets the NTRLUS Action RSN-A19. There is no other predominant Use than Residential here except Natural and Cultural Values Management.

RSN-A20 Planning schemes should prioritise the consolidation of established rural residential areas over the creation of new rural residential areas.

Reedy Marsh ELZ meets the NTRLUS Action RSN-A20.

RSN-A21 Target growth to preferred areas based on local strategy and consolidation of existing land use patterns.

Reedy Marsh ELZ meets the NTRLUS Action RSN-A21. We have long had a well-considered local strategy for this land use pattern.

RSN-A22 Planning scheme provisions must specifically enable subdivision opportunity to preferred areas by setting minimum lot sizes based on locality.

Reedy Marsh ELZ does not necessarily meet the NTRLUS Action RSN-A22. But importantly conservation covenants often preclude subdivision so for an ELZ such as Reedy Marsh there would be land for new housing stock due to the presence of undeveloped titles and through the occasional boundary adjustment.

RSN-A23 Ensure future locations of the Rural Living zone will not require extension of the Urban Growth Boundary Areas, compromise productivity of agricultural lands and natural productive resources.

Reedy Marsh ELZ fully meets the NTRLUS Action RSN-A23.

RSN-A24 Ensure future locations of the Environmental Living zone do not compromise environmental values.

Reedy Marsh ELZ fully meets the NTRLUS Action RSN-A24. The level of in-perpetuity conservation protection here is very high with only one title not permanently protected and there is a high percentage of protected covenanted area per the overall land area of the titles in the Zone. Landowners in the ELZ practice Natural and Cultural Values Management. Because the Landscape Conservation Zone inappropriately has Resource Use as a Discretionary Use and because of the vast array of exemptions accorded to it including forestry and land clearing, I argue that the new LCZ does not meet RSN-A24

RSN-A25 Consolidation and growth of rural living and environmental living areas is to be directed to areas identified in local strategy, that align with the following criteria (where relevant):

- *proximity to existing settlements containing social services;*
- *access to road infrastructure with capacity;*
- *onsite waste water system suitability;*
- *consideration of the impact on natural values or the potential land use limitations as a result of natural values;*
- *minimising impacts on agricultural land and land conversion*
- *minimising impacts on water supply required for agricultural and environmental purposes;*
- *consideration of natural hazard management;*
- *existing supply within the region;*
- *potential for future requirement for the land for urban purposes; and*
- *the ability to achieve positive environmental outcomes through the rezoning.*

There has been a large amount of work, already done by MV Council's Planners on this subject, i.e. rural living and environmental living areas since the 2007 PAL debacle.

Potentially MV Council's Amendment 4 of 2015 to its IPS fulfils that role and is especially useful in discussing all the areas and all rural residential zonings. Some fine tuning,

especially regarding the thorny issue of Minimum Lot Size, across the various residential zones and over specific areas may be useful, as well as better setbacks. Meander Valley Council's Amendment 4 of 2015 to the MVC IPS 2013 is far more useful than the State Planning Provisions of the TPS in my opinion.

Failure of the Tasmanian Planning Scheme and the Demise of the Environmental Living Zone

During the TPS SPP Process the State of Tasmania, though its minions was appraised of the failure of the SPPs to offer a viable pathway for the ELZ areas. Thus now the SPPs in the context of the ELZ represent an abject failure which has thankfully been recognised by Meander Valley Council in creating the 'PPZ-Larcombes Road' zone from the current ELZ.

Development Issues to be Addressed and Considered

Development Issues of the 'PPZ-Larcombes Road' zone to potentially be addressed or further discussed are:

- The scale and opportunity for any tourism or visitor related developments. This has been limited to existing buildings of 300 metres yet the only existing building appears larger than that floor area. The issue would be the fitness for purpose of the public road, the level of wildlife kill after dark and the amount of visitation. We would need a lower road speed on the unpaved Larcombes Road.
- The Bed and Breakfast accommodation land use. That may be AirBnB or whatever. The issue again would be the fitness for purpose of the public road for traffic especially at night.
- Wildlife Parks. I do not see this as appropriate, needing a tarred road. It is mentioned because some may see it as an opportunity for the 'PPZ-Larcombes Road' zone.
- Biosecurity Issues are relevant and need to be included in the 'PPZ-Larcombes Road' zone. Feral animals, native wildlife relocation, weeds, phytophpera. The place remains free of a range of introduced diseases and pests. The Covenants deal with such issues but those aspects are not supported in the Planning Scheme.
- The number of domestic daily vehicle movements on Larcombes Rd especially the after hours, night time use and wildlife damage is relevant. Larcombes Rd – is a single lane gravel surface with limited width, subject to flooding in a number of places, with a number of blind humps and or dips and is a dead-end road with a low design speed. A significant increase in vehicle movements especially at night would be an issue of concern.
- Virtually all of the land within the PPZ-Larcombes Road zone has a relatively low to very low land capability however some low impact horticulture and grazing is practiced on land outside of the Covenants.
- There is a number of artists who manufacture art and craft products within the 'PPZ-Larcombes Road' zone.

Prohibited Developments

The Uses and Developments of land which are and should continue to be precluded (Prohibited) entirely from the area include:

- Industrial Forestry in all its forms. That is: Commercial native forest logging, uncommercial native forest logging, illegal native forest logging , plantation forestry (such as Forico's), commercial firewood getting (widespread with much being illegal). There have been no forestry developments within the PPZ-Larcombes Road area for a period of about 45 years. The activity should be regarded as locally extinct.
- Subdivision - any entitlement should be determined by any allowances or approvals contained within the covenant. (See elsewhere)
- Any development which significantly increases pressure and traffic on Larcombes Rd especially by people who are not familiar with the road.
- Mining in any form. It is precluded in the conservation covenants.

More are listed briefly in the table further on.

The Uses and Developments of land which could be compatible with both the conservation covenants and the road are:

Discretionary Developments

- Bed and Breakfast accommodation:
- Tourism (only where not precluded by a covenant) (and a modest scale would be important re road use)

Permitted developments

- Residential:
- Home Office:
- Craft Manufacture: (NB I am unsure of the exact category of development regarding this activity but note there are a number of artists living in the PPZ-Larcombes Road area.
- Granny Flat: (Is a second smaller dwelling within a homestead curtilage)
- Horticulture (and a modest scale would be important)

More uses and developments are briefly listed in the table further on.

Shed Issues and Rights

Most developed properties in the PPZ-Larcombes Road area have sheds. Indeed almost anyone in Rural Meander Valley will have at least one shed. For the PPZ, I have attempted to summarise in the table below.

Size of Shed and rights to build and locate them is an issue to be addressed for inclusion in the PPZ-Larcombes Road zone. No shed planning right should transgress the setbacks and various clauses which maintain amenity, nor have any ability to be constructed within a covenanted area. It is the size of buildings and their location which is at issue and whether they require what easily becomes a substantial and expensive approval process when much of the restrictions are already in place.

An associated issue is the one of rights regarding the extension of, or addition to a shed. This is relevant to the PPZ-Larcombes Road zone.

Bushfire Hazzard

There have been no wildfires recorded in the Reedy Marsh ELZ since 1967. However there have been escaped fires across Reedy Marsh outside of the ELZ, many of them lit by humans. Those fires have been the result of ignorance, poor preparation, an absence of standards, varying levels of negligence, wanton neglect, delinquently lit and poorly controlled and some obviously illegal, some by forestry players.

There is no community fire plan. Currently the Tasmania Fire Service is doing a community consultation, encouraging better emergency planning regarding fire. This is supported. The fact is the contiguous natural forested values mean that there is a bushfire hazard in this area.

There remains no adequate regulation of fire in Tasmania. The Bushfire Code disadvantages landowners in the PPZ-Larcombes Road area but in general such an instrument is supported. This submission does not deal with the inadequacies of the SPP's Bushfire Code, as I am almost prevented from doing so.

Landscape conservation

In regards to scenic landscape conservation there has been no adequate study which seeks to understand lowland landscape values. The MV area contains sections of such country with a range of values, these are in the main declining. This 'PPZ-Larcombes Road' area has some important examples which should be conserved in the MV LPS scheme. Indeed the whole of Larcombes Road has scenic attributes which currently could be lost, especially under the TPS and the MVC LPS.

Water Tanks

For this 'PPZ-Larcombes Road' area, regardless of the land's water resources there is a need for water tanks and a generous amount of domestic storage. I see little point in limiting the ability of landowners to install more water, including water for bushfire fighting, as long as it meets setbacks and is outside of the covenanted area. Forcing a planning permit for the building or installing of water tanks would appear senseless in the circumstances.

Wind Turbines

The area (Reedy Marsh) and this 'PPZ-Larcombes Road' zone is very important lowland habitat for the Endangered Wedge Tailed Eagle. It also contains habitat for the Critically Endangered Swift Parrot and some very good habitat for the Masked Owl. Non-listed raptors such as the Collared Sparrowhawk are also present.

The established fact is that Wind Turbines chop up birds. I seek there be a clause in the PPZ which ensures no wind turbines in the PPZ-Larcombes Road area please!

Solar Panels and Tower Supports

Solar panels have no moving parts and are benign. There should not be restrictions on their installation including on tower supports up to the 8.5 metre limit to overcome winter shading. Putting the panels on a tower is better than chopping down a swathe of forest which may actually be listed or rare and which certainly has both habitat and amenity value.

Covenant Subdivision Rights

In this area much of the 19th century cadastre remains intact. This is relatively common in Tasmania.

Often (but not always) conservation covenants preclude subdivision. However there are some titles here with rights to subdivide and this is a relevant consideration for the 'PPZ-Larcombes Road' zone.

Properties with Subdivision Rights:

Owner	Address, Title or UPI	Description
Westley	400 Larcombes Rd	Right of one subdivision event specified in the Conservation covenant.
Woodward	700 Larcombes Rd	Right of one subdivision event specified in the Conservation covenant.
Ricketts	780 Larcombes Rd on CT 221026	Brady's Creek, one new parcel, min size 30 acres, as specified in the Conservation covenant.

My recommendation is: Subdivision rights should accord with the covenants and the PPZ-Larcombes Rd should not undermine nor negate rights negotiated as a part of the covenants. The covenants almost all predate the MVC IPS 2013. Such a standard would protect the area because the remaining subdivision rights are very minor. This is more relevant than the IPS clauses or the clauses in the draft 'PPZ-Larcombes Road' zone provisions.

Table of Undeveloped Titles

Undeveloped Titles:

Owner	Particular title/s	Number of Titles
Hoffman	Part of 450	2
Hawkes	Part of 464	1
Woodward	CT 150137/1 and 150137/2	2
Ricketts	CT 204936/1 and 134752/1	2

TOTAL		7
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The above table does show there is a moderate development outcome to be facilitated under the PPZ Larcombes Road area by developing the vacant land.

Table of Little Developed Titles

This table identifies land which currently has some form of dwelling but which may be considered somewhat primitive or rudimentary by modern standards, where an obvious domestic development opportunity could arise.

Owner	Particular title/s or address	Number of Titles
Westley	400 Larcombes Road	1
Hawkes	500 and 490 Larcombes Road	2
Russell	531 Larcombes Road	1
Howard	Formerly 591 Larcombes Road	1
TOTAL		5

The above table does show there is a further development outcome to be facilitated within the 'PPZ Larcombes Road' area.

Table of Existing Properties and their Dwellings

Dwellings, including houses:

Owner	Address and Current Dwelling	Other current building structure
Hawkes, Mike and Judy	House (Ex B&B residence) (two story), Wombat Way, 464 Larcombes Rd.	Old 1970s house, garage, gymnasium.
Hawkes, Mike and Judy	House, Acacia Park, 490 Larcombes Rd.	Farm Shed, Other sheds
Hawkes, Mike and Judy	House, The Burrow, 500 Larcombes Rd.	Shed.
Davies, Roger	House, (two story), 505 Larcombes Rd.	Granny Flat(two story), carport, shed

Owner	Address and Current Dwelling	Other current building structure
Howard, Ian obo Silvia and Pat	Dwelling, 591 Larcombes Rd.	(unsure)
Hoffman, Neil	House, (two story), 450 Larcombes Rd.	Sheds
Russell, Bill (deceased) The Estate contact: Jacqui Russell	House, (two story log cabin), 531 Larcombes Rd.	Sheds and Garage
Ricketts, Andrew	Dwelling, Bradys Creek, 780 Larcombes Rd.	Cabin (dwelling), Water tanks and solar panel tower, 4 Sheds, Bushfire Shelter and Carport and shipping container.
Woodward, Annemaree	(no dwelling), Aeolia, 700 Larcombes Rd.	none
Westley, Shane	Railway Fettleers Accommodation, (hut), 400 Larcombes Rd.	(unsure)
Pearce, Niq and Emma Bennett	New House, 335 Larcombes Rd.	(unsure)

Existing Qualities and Characteristics of the Particular Purpose Zone Larcombes Road in Reedy Marsh and Connections to Place

The following is a brief list (not in any order of priority) of salient and notable features, existing qualities, characteristics and connections to Place within the Particular Purpose Zone Larcombes Road in Reedy Marsh.

The Place is forested with small to very small intermittent historic, mostly 19th century clearings. Sporadic occurrences of residential dwellings are the discreet visual pattern. This has the effect that the Place has a high degree of privacy.

This mostly forested Place is characterised by a dominance of high visual amenity of in-forest views coupled with a natural ambience, including abundant wildlife. Threatened species are obviously present here, even to a relatively untrained eye. The community in this Place has a demonstrable commitment to the conservation of nature.

An intactness of the landscape, including a high aesthetic naturalness, is a strong feature of the Place. As such it can be considered the Place has a feeling of remoteness without being inaccessible. The Place is peaceful and quiet.

The community practices an avoidance of degradation of natural values. There are no recent clearfell, no modern land clearance, no industrial firewood getting, no degradation of riparian areas and so forth.

The Place has a very slow turnover of land ownership with a high proportion of landowners from 1991 and before remaining. There is virtually no land speculation and that has remained the case over a long period. There is a slow turnover of rental tenants.

Indeed the Place has a slow growth of development. Developments are usually planned carefully and considerably. Modest changes in development occur intermittently and occasionally. Mostly small scale of development is the dominant paradigm. The community in this place has, over a long period, practiced an avoidance of brash or crass development.

Significantly, powerlines are not routed along public roads in this Place, giving a 19th century feel. There is nothing larger than 'Minor Utilities' here. Some properties are on the grid and some are off it. There is no grid power beyond 531 Larcombes Rd. Opportunities for living with remote power therefore exist in the 'Particular Purpose Zone Larcombes Road' in Reedy Marsh.

The place is served by a public, narrow 'no-through road' of 19th century character and design, with attendant amenity gains. The place has almost no volume of traffic. The Place has roadside vegetation which in part is listed as Threatened and the remnant old growth trees, right up to the roadside have been retained and highly valued by the residents. Limited slashing of roadsides and no spraying of roadsides are the preferred outcome.

Within the 'Particular Purpose Zone Larcombes Road' there are very few weeds in roadsides. Likewise the properties here have either few or negligible weeds. This is in stark contrast to elsewhere in Reedy Marsh including the gorse infested Private Timber Reserves. Sadly there is the odd Sycamore in the SE of the area.

The place has no significant or commercial agriculture whatsoever. The land here has, in the main, a low land capability with relatively thin, poor rocky or sandy soils. The 'Particular Purpose Zone Larcombes Road' area is not agricultural land. Any agriculture practiced here now would be low impact, of very small scale and oriented around a high value situation, which benefited perhaps from the useful biosecurity opportunity. The entrapments of agriculture are not evident other than some remnants from the past – the antiquity of past land uses which have now long ceased is coupled with reversion in some parts of the area a less obvious feature.

Surprisingly this lowland but hilly place has a range of altitudes, aspects and micro climates but in any case it is almost always a protected, temperate Mediterranean climate with some inland continental influences, more rainfall than say Launceston, as well as benefitting from the influence and protection afforded by Stephens Hill. This is an area at the foot of and on the slopes of Stephens Hill. The catchment divide situation means the water resources are both minor and relatively unpolluted.

The character of the 1970s settlement and 'back to the land' dwellings still remains a feature with 5 buildings but may vanish unless recognised.

Residents have a strong attachment and sense of place. The above qualities of the area engender this response to the proposal for a Particular Purpose Zone-Larcombes Road in Reedy Marsh.

The effect of the substantial retention and protection of natural forest means the PPZ-Larcombes Road area would likely overall be increasing carbon stocks, even when past development is considered. This has not been quantified.

Desired Future Character

It is important that a Desired Character statement be included to guide development in the Zone.

Discussion of Purpose in Various Zones and their Suitability for the Particular Purpose Zone at Reedy Marsh

Original draft 2017 Council zone purpose: *“Residential use where natural and landscape values are to be retained.”*

My 2017 Suggested Purpose: *“Discreet and unobtrusive Residential use where natural and landscape values are being conserved, protected and retained.”*

Current, 2018, Particular Purpose Zone-Larcombes Road Zone Purpose:

“MEA-P1.1.1 To provide for residential use or development in the Larcombes Road area at a very low density, consistent with the natural and local landscape values of the zone.

MEA-P1.1.2 To provide for compatible, non-residential use that is low impact and does not cause an unreasonable loss of amenity through scale, intensity, noise, traffic generation and movement, or other off site impacts.”

I will continue to argue for some of my word suggestions such as “unobtrusive” for example be added.

Table of Uses and their Suitability for the Particular Purpose Zone-Larcombes Road at Reedy Marsh

Use Classes Considered: Permitted Absent a Permit, Permitted with a Permit, Discretionary and Prohibited.

USE	Recommended Permit Status	Comment or Reason
Art & Craft Centre	Discretionary	Causes additional visitation.
Arts and Crafts Manufacture	Permitted absent a Permit	Unlikely to cause significant additional visitation nor would it be a disruption through noise etc. Some current use.
Boundary Fencing.	Discretionary	Some covenants have clauses regarding boundary fences. Wildlife does not benefit from fencing. Note the Boundary Fences Act provides for Agreements.
Carport	Permitted with a permit	Provided setbacks are met and no bushfire hazard accrues.
Childcare Centre, school, existing respite centre.	Prohibited	Inappropriate for the area. Would damage sense of place. Road not suitable. Bushfire hazard concern and traffic considerations.
Church, public hall.	Prohibited	As above

USE	Recommended Permit Status	Comment or Reason
Commercial Firewood Getting.	Prohibited	Most covenants Prohibit Commercial Firewood.
Domestic animal boarding/breeding/training.	Discretionary	See the Covenants: within a Covenant Area domestic zone or exclusion area designed for the Purpose.
Emergency Services.	Discretionary	(Regarding infrastructure)
Food Services 200m2	Discretionary	See the Covenants: within a Covenant Area domestic zone or exclusion area designed for the Purpose.
Granny Flat: in either a building area on a sealed plan or within a Covenant Area domestic zone designed for the Purpose.	Permitted with a Permit	See the Covenants: within a Covenant Area domestic zone or exclusion area designed for the Purpose.
Grazing. Small scale.	Permitted absent a Permit	In areas where permitted within a Covenant such as a Domestic zone or outside of the Covenanted area. Would be limited by land capability and the size of any suitable area.
Home based business.	Permitted with a Permit	Only issue here would be level of traffic.
Home based Childcare	Discretionary	Depends on scale of operation. There are the Bushfire Hazzard issue and traffic considerations.
Home Office	Permitted absent a permit	Outside of the Covenanted area or in a Domestic Zone.
Horticulture	Permitted absent a permit	In line with Management Plan activities and standards permitted within a Covenant or outside of the Covenanted area.
Manufacturing.	Prohibited	Unless for arts and crafts (see above). Other manufacturing would be inappropriate for the area. Would damage sense of place.
Mining. (Including Fracking)	Prohibited	All covenants Prohibit mining. Inappropriate for the area. Would damage sense of place.
Natural Cultural Values Management.	Permitted Absent a Permit	In line with Management Plan activities and standards permitted within a Covenant or outside of the Covenanted area.
Outdoor recreation facility.	Discretionary	Depends on scale of operation.

USE	Recommended Permit Status	Comment or Reason
Passive recreation.	Permitted Absent a Permit	In line with Management Plan activities and standards permitted within a Covenant or outside of the Covenanted area.
Religious Retreat, but not including hospital services or a drug rehabilitation centre	Discretionary	In line with standards permitted within a Covenant or outside of the Covenanted area.
Resource Development (intensive animal husbandry or plantation forestry)	Prohibited	To the best of my knowledge all covenants Prohibit such activities
Resource Development. (Native Forest Logging)	Prohibited	To the best of my knowledge all covenants Prohibit
Resource processing. (e.g.: abattoir, animal saleyards, sawmill and others)	Prohibited	Inappropriate for the area. Would damage sense of place
Resource processing. Small scale: (for example Honey processing)	Discretionary	Potentially appropriate for the area. Would not damage sense of place if at small scale.
Retail associated with primary produce, resource development, local shop	Prohibited	Inappropriate for the area. Would damage sense of place. Road not fit for purpose.
Shed: Extension to existing approved structure. Not more than 50% increase on original and approved structure.	Permitted absent a permit	Should not require planning as there is already an approved structure in a planning sense. Provided zone setbacks are met and no bushfire hazard accrues. Limitation: Up to 50% or the existing floor area. To the same approved standard. And no additional bushfire hazard accrues.
Shed: New – Larger- over 120 sq. metres.	Permitted with a permit	Provided zone setbacks are met and no bushfire hazard accrues.
Shed: New – Smaller, say 120 sq. metres and smaller.	Permitted absent a permit	Provided setbacks are met and no bushfire hazard accrues.
Single dwelling.	Discretionary	See above.
Single dwelling: in either a building or domestic area on a sealed plan or within a Covenant Area domestic zone designed for the Purpose.	Permitted with a Permit	See the Covenants: within a Covenant Area domestic zone or exclusion area designed for the Purpose. No limitation as to coverage or size of the structure apart from max height.

USE	Recommended Permit Status	Comment or Reason
Tourist Operation.	Discretionary	Refer to Conditions on Covenant. Some covenants prevent tourism. Concerned about level of use of Larcombes Rd, esp. after dark.
Utilities – Minor.	Discretionary	Any extension should be underground. Far safer underground in bushfire terms.
Utilities – Remote Power and NBN	Permitted absent a permit	When ancillary to a domestic building or shed. Underground, except towers.
Utilities.	Prohibited	Inappropriate for the area. Would damage sense of place.
Vehicle fuel sales & service	Prohibited	Inappropriate for the area. Would damage sense of place.
Veterinary centre.	Prohibited	Inappropriate for the area. Would damage sense of place.
Visitor Accommodation.	Discretionary	Refer to Conditions on Covenant. Some covenants prevent this use. Concerned about level of use of Larcombes Rd. Scale is relevant.
Water Tanks to 180,000 L	Permitted absent a permit	Provided setbacks are met and no bushfire hazard accrues. Tanks to be bushfire resistant. Other tanks (than water) to require a permit.
Wildlife Park.	Prohibited	Road not fit for purpose. Biosecurity Issues

The above table and list represents preliminary thoughts but this is a complex table of uses and I would remain open to further discussion, one way or the other. This table is a work in progress and may not be complete.

Discussion of Development Standards in Various Zones and their Suitability for the Particular Purpose Zone at Reedy Marsh

As per Council's headings:

Site Coverage

Unsure about this standard.

Building Height

This needs to allow for two story houses and infrastructure such as towers for solar panels and water header tanks. Eight or 8.5 metres allowance would be wise and would not present intrusiveness problems on almost all sites. After all the surrounding native tree canopy is 25 to 35 metres.

Front Setback

This is a critical issue, not only in the public road section of the zone in the SE but in the NW section too which is served by a privately maintained road. All of the current setback standards could be considered to be a marginal distance.

The former Davies' house at 505 would be the one property with the shortest front setback distance. There should be no further developments with a lesser minimum setback distance than 50 metres. Recently the 335 Larcombes development achieved quite a respectful and reasonable degree of privacy with a greater setback and improved unobtrusiveness, given the site.

Side and Rear Setback

These setbacks are less of an issue and are fine.

Setback to Rural/Agriculture Zones

I see little point in discussing this aspect in detail. My views on PAL are known. I have long considered the 200 m setback represents an unreasonable donation by the rate payers of the Particular Purpose Zone-Larcombes Road.

Because of the permanently protected forested environment, the setback could be allowed to be relaxed and still achieve the PAL goal. That relaxation clause should be a part of the Particular Purpose Zone-Larcombes Road.

There are a few properties in the 'Particular Purpose Zone-Larcombes Road' at Reedy Marsh which have a boundary to the Rural Resource Zone - Such as Hoffman, Westley, Howard and Ricketts. All of those boundaries also happen to be onto Private Timber Reserves.

The creation of all of those PTRs was challenged and appealed by whatever means possible by residents. All of the PTRs these days are managed by absentee landowners. So this issue remains relevant, as the adjoining PTR activities are universally considered by rate payers to be unsustainable, adverse, not in keeping with the values of the area and noxious.

Exterior Finishes

Not really relevant, if good setbacks are achieved.

Road Access – new dwellings

Yes. All should be Permitted.

Landscape Protection

Yes. This should be applied to the area.

The Critical Issues

The physical and legal road access, both Council maintained sections and the privately maintained roading and regardless of its tenure and legal status, considering its fitness for primarily a domestic purpose only and the amount of traffic any development proposal would generate.

The long standing domestic residential use of the area and the desirability of a community which respects and engages in modest, careful development that is compatible with and supporting of the Secure conservation reserves on private and public land and which maintains and enhances our sense of place.

The opportunity of a PPZ is to strengthen the high natural qualities of the area as identified above which will enhance the best and highest value whilst supporting the intended purpose in my view.

A generously large front setback figure to ensure seclusion and remoteness is not damaged.

The substantial range of Prohibited and Discretionary Uses.

The 200 metre setback clause.

The name of the Zone.

Additional Development Issues

The following matters need to be included in the Particular Purpose Zone for this area. Standards and rights should be considered and established.

1. Land Clearance for Purposes as Authorised on Land within a Domestic Zone or Other Special Purpose or Miscellaneous Zone within a Conservation Covenant under the Nature Conservation Act.
2. Land Clearance for Purposes as set out in the Planning Scheme Particular Purpose Zone on land within a title which has Covenanted Land but where the land is outside of the Conservation Covenant under the Nature Conservation Act as shown on the relevant CPR Plan.

Importantly, it must be noted land clearance is otherwise prohibited under a Conservation Covenant under the Nature Conservation Act.

It should also be noted that within the current Environmental Living Zone at Reedy Marsh there is a majority of covenants, which do not have Domestic Zones but more simply exclude such areas from the covenant. Then there are 3 covenants, which do have Domestic Zones, which will translate into five titles.

Domestic Zones under a covenant provide an additional level of management control by way of the covenant and its management plan than can be exercised where an Exclusion area has been constructed.

It should be noted that there are Exclusion areas within the ELZ, which are larger than would be necessary for a domestic area, as I have stated in my original submission. However, most of those areas (but certainly not all) are over already cleared land, although some of that has reverted.

There are also Domestic Zones, which have regrowth forest, reverted cleared land, silvicultural regeneration, as well as patches of intermittent native pasture and some high quality forest in old growth condition. The point is that such areas are not devoid of ecological values but that generally such areas were selected by the owners because the values were considered to be lower, the areas more disturbed. The areas are also more appropriate for a range of other reasons, such as access for example, as places where development could occur.

It should be remembered that the proposals to either exclude or zone such areas for domestic use and development were vetted by both the State and Commonwealth Governments at the time of negotiating and creating the covenants, mostly under the RFA.

Owner and Address	Covenant Domestic Zones	Exclusion Areas
Hawkes, Mike and Judy: Wombat Way, 464 Larcombes Rd.	YES	NO
Hawkes, Mike and Judy: Acacia Park, 490 Larcombes Rd.	NO	YES
Hawkes, Mike and Judy: The Burrow, 500 Larcombes Rd.	NO	YES
Hawkes, Mike and Judy: (A small title between 464 and 490)	NO	YES
Formerly Davies, Roger: 505 Larcombes Rd. (Just changed hands)	Not applicable, no covenant.	Not applicable
Howard, Ian obo Silvia and Pat Howard: formerly 591 Larcombes Rd.	NO	YES
Hoffman, Neil: 450 Larcombes Rd. (3 titles)	YES	YES
Russell, Bill (deceased) Estate: Jacqui Russell: 531 Larcombes Rd.	NO	YES
Ricketts, Andrew: Bradys Creek, 780 Larcombes Rd.	NO	YES
Ricketts, Andrew: Echidna Creek, 780 Larcombes Rd.	YES	NO
Woodward, Annemaree: Aeolia, 700 Larcombes Rd.	NO	YES
Westley, Shane: Hollybank, 400 Larcombes Rd.	NO	YES
Pearce, Niq and Emma Bennett: Ruby Rise, 335 Larcombes Rd	NO	YES

It should be noted that a Covenant with areas on title that are simply excluded (unencumbered) is generally a simpler document. However, it must also be noted that there is a potential for activities on 'exclusion areas' to impact adversely on the covenanted portion of the title.

I do not think there should be a blanket right to completely clear any ‘exclusion area’ of vegetation but that a blanket prohibition is also unreasonable.

Rights in the PPZ should be oriented towards assisting the intention to have a residential development, whilst conserving the ecological values. After all, landowners have permanently and securely protected the overwhelming majority of their private land, a vastly greater contribution to the public good than anywhere else in the municipality.

A domestic dwelling requires a clearance area around the dwelling to mitigate against bushfire attack and to meet the Bushfire Hazzard Code. Reedy Marsh around Stephens Hill has not been subject to catastrophic bushfires in recent memory. The ability to meet the Code and to have a safe environment around one’s house is a reasonable goal for sustainable development.

When one looks at Council’s Priority Vegetation mapping one can see that much of the Covenant Domestic areas and exclusion areas are either cleared or not supporting Priority Vegetation. But not quite all and in any case the mapping generally across the municipality is only about 60% accurate. In essence, however these properties already have vegetation reports, which largely clarify vegetation values.

I have come to the conclusion that land clearance over the exclusion areas and domestic zones should be allowed without requiring a vegetation report.

An Alternate Name for the Zone

A new name for the zone currently titled “Particular Purpose Zone-Larcombes Rd” (at Reedy Marsh) in the Meander Valley Local Provisions Schedule is discussed below and recommendations made.

In Ms Oliver’s email to residents of the 30th November, 2017 she stated: *“Two residents have suggested naming the zone ‘Particular Purpose Zone – Natural Living Reedy Marsh’. I would appreciate any comments or suggestions anyone may have in regard to this before I wrap up the draft zone for next week.”*

This is therefore, a response and a further explanation of my thoughts about the proposed name for our new (draft) Particular Purpose Zone (PPZ), which in fact I have proposed and which you have circulated to residents by email, that is: **‘Particular Purpose Zone – Natural Living - Reedy Marsh’**

I consider the name of our land use planning zone, which replaces our Environment Living Zone to be important, as people looking to buy property, increasingly want to know which zone they will be buying into when they purchase a property and of course, what its standards and purposes to be etc. It is also a marketing tool and a useful way of promoting the current amenity and values of the area.

Currently in the Meander Valley Interim Planning Scheme 2013, the name of our land use planning zone is “The Reedy Marsh Environmental Living Zone” (ELZ). This name will, unfortunately, be removed and a similar replacement, inexplicably, not allowed when we transition to the Tasmanian Planning Scheme. It seems we are subject to a pathological hatred

The ELZ became a valid part of the state planning template, created at the time of Labor’s regionalised Interim Planning Schemes process, which created Meander Valley’s current Interim Planning Scheme 2013. And indeed, it was pursuant to the Northern Tasmania

Regional Land Use Strategy. The Reedy Marsh Environmental Living Zone is the only such zone in the Meander Valley. It is unique state-wide in fact.

The cheap and nasty State Planning Provisions of the Liberal Tasmanian government's Tasmanian Planning Scheme, unilaterally removed the Environmental Living Zone. This was criticised over and over but it persisted.

The Guidelines, written by the TPC, suggests the Landscape Conservation Zone (LCZ) should be a replacement for the Environmental Living Zone. Meander Valley Council's Senior Planner, saw that this LCZ would not be a fit for our area. Others, including the writer, objected strongly to the term Landscape Conservation Zone and importantly objected to the zone's inadequate and ill-considered provisions as well. This zone may have worked in a municipality in southern Tasmania with particular development issues but it does not work here.

It was suggested that a 'Particular Purpose Zone' could be appropriate and Council has agreed. This, as you know, is a custom provision where the Council can design the zone the way it prefers. A 'Particular Purpose Zone' is one of the few ways of overcoming the incipient problems of a very inflexible set of State Planning Provisions (SPP), which doubtless will manifest repeatedly not only in Meander Valley. The PPZ, is a good solution for this area, in the circumstances and I forecast residents will support it.

The version in the draft LPS of the 'Particular Purpose Zone' for our area, gave our zone a name of 'Larcombes Road'. I remain uncomfortable with this name and gave reasons for other choices and proposals by way of submission dated the 12th November 2017 and on 2nd December 2017.

It must be noted the Hodgeman Liberal Government has antipathy to the word "Environmental" and indeed the term 'Environment Management Zone' is already in use in the SPP part of the Tasmanian Planning Scheme. Likewise, the term "Conservation" is obviously already in Use in the SPP.

There is also a substantial problem with the term: ***"Particular Purpose Zone - Larcombes Road"*** in my opinion. The problem is simply that Larcombes Road is not a particular purpose at all. It is a location! That in itself, may adversely affect the PPZ zone's survival. Far better, in my opinion, to articulate the purpose of the zone in the name itself.

Our 'PPZ-Larcombes Road' ideally needs both a location and a purpose. The location however, is the easy part. I have already suggested to Council, either the Locality of 'Reedy Marsh' or geographical feature of 'Stephens Hill' should be included in the zone name. Larcombes Road in my opinion is somewhat less adequate when compared to the previous two choices but would be a third choice. Our formal Locality name is Reedy Marsh and that land locality boundary is in regular use, so people can find Reedy Marsh easily. The whole of the 'PPZ-Larcombes Road' is within the Locality of Reedy Marsh. That clarity is an advantage when dealing with land. I strongly favour the use of the Locality in our zone name and that is my first preference.

Returning to the purpose and my choice of name for the ***"Particular Purpose Zone -"*** here at Reedy Marsh. By the way, as you know, our zone must be baptised with the generic ***"Particular Purpose Zone -"*** followed by some descriptor or identifying name, I argue that needs to be a term, which includes the purpose of the zone. And if it is not for a particular purpose then it would be a concern were the Tasmanian Planning Commission to not approve it but rather substitute something else, that is, some other zoning.

Thus, we come to consider the **purposes** of the existing ELZ zone here: One purpose is a residential one albeit at very low density, another purpose is the conservation of nature in such a way as to consider the very low density residential purpose.

In almost all cases (on all titles), the residential **purpose** came first, perhaps because conservation covenants on private land are relatively new, starting a few years after the commencement of the 1997 Regional Forest Agreement.

Although there was originally some subsistence rural activity in the area in convict and colonial times that has long dissipated, such that now even the names 'rural residential' or 'rural living' would be both redundant and incorrect.

In terms of a name for the zone: I suggest again the 'Particular Purpose Zone (PPZ) – Larcombes Rd' should be termed: '**Particular Purpose Zone – Natural Living - Reedy Marsh**' or '**Particular Purpose Zone – Natural Living - Stephen Hill**' if you wished to separate the name of the various zones further.

I wish to demonstrate to Council the reasons for choosing the word Natural to partner the word 'Living' as a descriptor for the zone. The underlining below is my emphasis.

Firstly, I take the term 'Natural' to mean the following:

1. From the Oxford Dictionary. *"In accordance with the nature of, or circumstances surrounding, someone or something."* Also: *"Existing in or derived from nature; not made or caused by humankind."* Again Oxford Dictionary.
2. From the Free Dictionary: *"1. Present in or produced by nature: 2. Of, relating to, or concerning nature: (such as) a natural environment. 3. Conforming to the usual or ordinary course of nature."*
3. From Dictionary.com: *"1. existing in or formed by nature (opposed to artificial): 2. based on the state of things in nature; constituted by nature: 3. of or relating to nature or the universe: 4. of, relating to, or occupied with the study of natural science: 5. in a state of nature; uncultivated, (such as) as land." And 6. growing spontaneously, without being planted or tended by human hand, (such as) as vegetation.*

Conservation covenants dominate here and are binding agreements, made voluntarily between a landholder and the state government, to protect and enhance the natural, cultural and scientific values of a piece of private land under the Nature Conservation Act (NCA), which is of itself a part of the RMPS.

In-perpetuity, conservation covenants on private land in Tasmania are a part of the National Reserve System of Australia, which in itself deserves to be supported by local government. This in itself is a significant public interest. The Commonwealth states:

"The National Reserve System is Australia's network of protected areas, conserving examples of our natural landscapes and native plants and animals for future generations. Based on a scientific framework, it is the nation's natural safety net against our biggest environmental challenges.

The 'PPZ-Larcombes Road' area has a higher degree of both aesthetic naturalness and biophysical naturalness, not only when compared with the RM Rural Living Zone (RLZ) zone, but when viewed with other RLZ zoned areas in the MVC area. These two terms are ones used in the Regional Forest Agreement (RFA) especially in the Comprehensive Regional Assessment, made under the National Forest Policy Statement. Most of the private land covered by in perpetuity conservation reserves in the zone was created under the RFA.

There is a range of natural values, including the conservation of several threatened species and poorly reserved and threatened vegetation communities. The area has abundant native wildlife and that amenity is relatively unique in itself.

People owning land in the 'PPZ-Larcombes Road' at Reedy Marsh strongly support retention of the natural values of the area. In this location of Reedy Marsh, there is a homogenous largely natural securely protected area dedicated mostly to nature conservation.

In the recent draft of the PPZ zone Meander Valley Council states:

"The purpose of the Particular Purpose Zone – Larcombes Road is:

MEA-P1.1.1 To provide for residential use or development in the Larcombes Road area at a very low density, consistent with the identified natural values of the zone.

MEA-P1.1.2 To provide for compatible, non-residential use that is low impact and does not cause an unreasonable loss of amenity through scale,"

In my November 2017 submission to Council I stated:

"An Objective of the Zone may be: To care for and maintain and enhance the natural, aesthetic and environmental values within the area."

The NTRLUS Version 6 identified a vision for Northern Tasmania which states:

"To create a region that through innovation and strong partnerships makes intelligent use of its natural advantages to create a positive, affordable and competitive future for all our communities."

Nowhere does the "natural advantages" apply more than somewhere like the PPZ of Reedy Marsh.

The NTRLUS ostensibly underpins the current MVC IPS 2013 planning scheme and will (because of legislation) underpin the Local Provisions Schedule of Council within the Tasmanian Planning Scheme. Making a good link to the NTRLUS will be important if the TPS try to change the zone back to the standard SPPs.

Indeed, I wish to propose here and now that the Northern Tasmania Regional Land Use Strategy Version 6 is a document, which is referred to in our Local Provisions Schedule to make sure the connection is secure and that it can be relied upon.

This mostly forested place is characterised by a dominance of high visual amenity of in-forest views coupled with a natural ambience, including abundant wildlife. Threatened species are obviously present here even to a relatively untrained eye. The community in this place has a demonstrable commitment to the conservation of nature.

An intactness of the natural landscape, including a high aesthetic naturalness, is a strong feature of the Place. As such, it can be considered the Place has a feeling of remoteness without being inaccessible. The Place is peaceful and quiet.

The community in the 'PPZ-Larcombes Road' area practices an avoidance of degradation of natural values. There are no recent clearfells, no modern land clearance, no industrial firewood getting, and no degradation of riparian areas, very few weeds and so forth. This in itself is a public interest, which is facilitated to be an ongoing behaviour by the PPZ zoning.

Current ELZ zone purpose states: “Residential use where natural and landscape values are to be retained.”

You can, I hope, see the wide usage of the word ‘**natural**’ in the world of planning and in relation to our PPZ-Larcombes Road area. This is not accidental.

In terms of a name for the zone: I thus wish to reiterate my recommendation that: the draft name of “*Particular Purpose Zone – Larcombes Rd*” should instead be termed: ‘**Particular Purpose Zone – Natural Living Reedy Marsh**’ or ‘**Particular Purpose Zone – Natural Living Stephen Hill**’, if indeed Council wished to separate the name of the various zones further.

It is certainly accepted and agreed that the associated words to natural such as: ‘naturalize’, ‘naturalist’, and ‘naturalism’ would not be suitable and have unusual connotations and a different meaning. Those words should not be confused with the word ‘natural’.

The writer considered other terms besides ‘natural living’. The word ‘**living**’ would seem the preferred land use planning descriptor for residential land outside of the Urban Growth Boundary. So it has been used. Other terms besides ‘**natural**’ seem to not have as many connections to various other aspects of the planning and strategy documentation but I have considered others as well. See below:

I suppose there is the term: ‘**Eco Living**’ and that would translate to: ‘**Particular Purpose Zone – Eco Living - Reedy Marsh**’. But I suspect the term ‘**Eco**’ or even ‘**Ecological**’ may have a rocky road too under the Liberals dark age. But ‘**Eco Living**’ or ‘**Ecological Living**’ would be satisfactory. I do not think it is as satisfactory as ‘Natural Living’ because of all the connections the word ‘natural’ has to other aspects of the Tasmanian planning system and the National Reserve System, of which we are a part. It is not my first choice but would do the job.

There could alternatively also be: ‘**Sustainable Living**’ and that would translate to: ‘**Particular Purpose Zone – Sustainable Living - Reedy Marsh**’. I must confess I have little interest in the term ‘sustainable’, it is so abused. But it is referred to in the RMPS Objectives. It is not favoured by the writer.

Alternatively there could be: ‘**Conserver Living**’ and that would translate to: ‘**Particular Purpose Zone – Conserver Living - Reedy Marsh**’. The word ‘conserver’ is quite close but not the same as ‘conservation’ and indeed the zone, which the TPC would potentially like to see, applied here being the ‘The Landscape Conservation Zone’. However, although I do not mind the term “Conserver” it is not in common usage. Another similar term is the word ‘Conservant’ which is archaic. It is not favoured.

If Council has other names or terms, which it prefers and indeed have the reasons for adoption I would of course be quite willing to consider them.

Surrounding Zoned Land to the Particular Purpose Zone-Larcombes Road Issues

The Particular Purpose Zone-Larcombes Road adjoins the following zones, being the Environment Management Zone, the Rural Zone, and the Agricultural Zone. I therefore make some comments in relation to those illogical and arcane LPS zoning decisions, which are represented in the draft Meander Valley Local Provisions Schedule of the Tasmanian Planning Scheme.

Regarding both the Rural Zone and the Agricultural Zone the situation is, that for the titles, which join the Particular Purpose Zone-Larcombes Road zone, both happen to be Private Timber Reserves (PTR). It is instructive that one of the Private Timber Reserves has been mapped into the Reedy Marsh Agricultural Zone to the SE of the PPZ and second PTR is within the rural zone on the slopes of Stephen's Hill to the West of the PPZ.

Both PTR properties in question contain native forest, which is of either high or indeed the highest conservation value, especially in the SE. The successive owners of both properties remain seemingly with the unflinching aspiration to liquidate the high conservation value forest. Indeed the PTR in Parkham, has to a large extent succeeded in that goal, diminishing amenity for the adjoining landowner.

I wish to put it on the record that I remain opposed to the establishment of a Reedy Marsh Agricultural Zone, as it is currently mapped, which in the draft LPS zone map adjoins the Particular Purpose Zone-Larcombes Road zone.

The first reason for my opposition is simple, the land in the Reedy Marsh Agricultural zone has multiple titles supporting listed, threatened and indeed has critically endangered habitat for listed species.

The Second reason for my opposition to the Reedy Marsh Agricultural Zone is that it contains very little land with a useful, modern capacity for agriculture, other than the current minor semi-subsistence style of use, which I argue is not economic nor viable agriculture. Some minor income is derived from the land from agriculture in some instances and although I am sure that is welcome, I do not regard such hobby style activities to be consistent with the agricultural zone. Forestry does obviously occur in this area and is a mix of artificial plantations and the liquidation and extraction of native forest.

This land, in the main, has a pH of about 4.5 and in many places a solid impervious layer of clay under thin Aeolian soils including extensive tracts of acid sulphate soils. It is possibly okay to have such semi-subsistence agriculture on such partially cleared marginal land, because that is what it is but I would urge Council to desist from its campaign to zone such land as Agricultural and to not place such land in the Agriculture Zone. It is not okay to facilitate the removal of Threatened vegetation by such inappropriate zoning coupled with a deliberate absence and avoidance of mapped Priority Vegetation in the Zone.

My Third objection to the Reedy Marsh Agricultural zone which already has several private Timber reserves evident and in the situation where most of them have been recently harvested and virtually all have been recently replanted to artificial plantations. The PTR driven forestry, currently in the draft Reedy Marsh Agricultural Zone, is of an industrial nature, has diminished the amenity of the area, which existed prior to 1997 and which appears likely to continue regardless of whether it has a social licence or not. The guidelines suggest that a more appropriate zone would be the Rural zone.

Finally, there is a few titles in the Reedy Marsh Agricultural zone, which adjoin and indeed belong, in the Reedy Marsh Rural Living Zone. I say that because the owners of the relevant blocks in question actually live in the Reedy Marsh Rural Living Zone themselves.

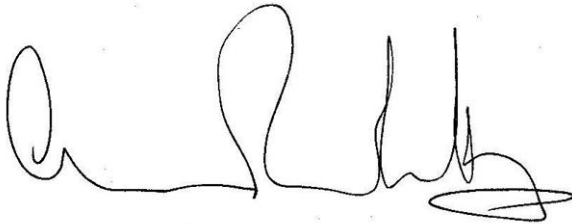
When you consider all of the above issues it is perfectly clear that the land currently in the Reedy Marsh Agricultural Zone should be zoned mainly into the Rural zone with a small amount (3 blocks) into the Reedy Marsh Rural Living Zone.

Conclusion

I realise this representation is perhaps more comprehensive than envisaged, however I hope it assists to make a positive contribution in this dark age of land use planning under the atmosphere of anti-local government, anti-conservation sentiment.

I look forward to Council's report.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Ricketts'. The signature is fluid and cursive, with a large initial 'A' and a long, sweeping underline.

Andrew Ricketts