
From: siri anne bjorhusdal [REDACTED]
Sent: Monday, 4 May 2026 1:18 PM
To: Kingborough LPS
Subject: [REDACTED] kingborough Local Provisions Schedule- Direction 69/ Ireneinc Report
Attachments: [REDACTED] submission Bjorhusdal.pdf; [REDACTED] Attachment A.pdf;
Collective_Cover_Submission_[REDACTED] and [REDACTED].pdf;
Inconsistency_Analysis_Per_Locality.docx; Locality_Reference_Guide_Part_E.docx;
PTR.png

Dear Tasmanian Planning Commission,

Please see the 6 attachments in regard to the recommended rezoning of my property.

With respect,

Siri Anne Bjorhusdal

 Please consider the environment. Do you really need to print this email

WRITTEN SUBMISSION TO THE

TASMANIAN PLANNING COMMISSION

Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report

To the Tasmanian Planning Commission,

I write in response to the letter dated 2 April 2026 (ref: DOC/26/36829) advising that the Ireneinc report recommends my property remains within the Landscape Conservation Zone (LCZ) under the draft Kingborough Local Provisions Schedule (LPS).

I did not make a formal representation during the public exhibition period, however I understand that the Commission has received correspondence from me or on my behalf in relation to the draft LPS. I understand that this letter provides me the opportunity to formally participate in this stage of the LPS process by making a written submission.

I understand that making a submission does not confer a right to be heard, but that the Commission may decide to invite me to discuss the matters raised.

I take up that opportunity and submit as follows.

Landowner name(s)	Siri Anne Bjorhusdal
Property address	██████████
Title reference (folio)	██████
Lot size (approx.)	6.39ha
Locality	Margate 7054
Current IPS zone	Environment Living zone
Draft LPS exhibited zone	Landscape Conservation Zone
Ireneinc recommended zone	Landscape Conservation Zone
Zone sought in this submission	Rural Living Zone

PART C – STATEMENT OF POSITION

I submit that the application of the Landscape Conservation Zone (LCZ) to my property is not consistent with the requirements of section 34 of the Land Use Planning and Approvals Act 1993 (LUPAA), the Section 8A Guideline No. 1 — Local Provisions Schedule: Zone and Code Application (the Zone Guidelines), or the Southern Tasmania Regional Land Use Strategy (STRLUS).

I request that the Commission determine that the Rural Living Zone (RLZ) is the appropriate zone for my property under the draft Kingborough LPS.

The specific subcategory I seek is:

Rural Living Zone C (minimum lot size 5ha) — appropriate where lot sizes exceed 5ha and no further subdivision is intended.

This subcategory reflects the existing pattern where the predominant lot size in my area is approximately below 10 ha, consistent with RLZ.

The predominant lot size in Margate with approximately 5 ha is consistent with RLZ C.

PART D- GROUNDS FOR THIS SUBMISSION

D1 — The LCZ does not comply with the Zone Guidelines (Guideline No. 1 / s.34 LUPAA)

The Commission is required by section 35L(2) of LUPAA to assess whether the LPS meets the LPS criteria, which includes compliance with the Zone Guidelines.

The Commission confirmed at the Day 20 hearing that it will decide on the basis of the LPS criteria set out in section 34 of LUPAA and explicitly noted that Council's position — including its 16 March 2026 resolution favouring the 'least restrictive alternative' — is not binding on the Commission [Transcript, Day 20, 06:45:48].

I submit that the application of LCZ to my property does not comply with the Zone Guidelines as demonstrated below.

D1.1 — The Zone Guidelines prohibit LCZ where priority is residential (LCZ 4(a))

Zone Guideline LCZ 4(a) provides that the LCZ should NOT be applied to land where the priority is for residential use and development, instead indicating that the RLZ should be referred to. The Zone Guidelines further note explicitly that 'the LCZ is not a large lot residential zone, in areas characterised by native vegetation cover and other landscape values.'

My property has been used for residential purpose throughout the period it has been zoned Environmental Living Zone (ELZ) under the Kingborough Interim Planning Scheme 2015.

During my tenure, the primary use and strategic intention of the land is and has always been residential.

The property contains a dwelling constructed in year 2020 and has been continuously occupied since 2011.

(In 2015 a group of elderly family members of the first settlers in this area the McGowans family (██████████ named after them) contacted me to ask if they could see their family history first property, I was happy to do so, we walked around my property and they recognised areas of stories told of where the house, shed, stable and orchards were, here is still some house concrete slab pieces remanences from their family home present on my land, they told of big fruit orchards, paddocks and fields, and their great grandparents going to Sunday church at Nierinna road sometimes walking other times with horse and cart, I have their contact details if like more confirmation).

There is no evidence to suggest the primary use is other than residential.

D1.2 — The LCZ is not a replacement zone for the ELZ (Zone Guidelines note)

The Zone Guidelines state expressly: 'The LCZ is not a replacement zone for the ELZ in interim planning schemes.

There are key policy differences between the two zones.' The TPC itself noted this in its post-lodgement correspondence with Council, observing that the LCZ 'appears to have been used quite extensively to replace the ELZ' and that 'application of the LCZ could signify a shift in council policy or strategy, which generally ought to be comprehensively justified.'

No such comprehensive, site-specific justification has been provided for my property. The Ireneinc report applies the LCZ to my property on the basis of generalised locality-level landscape values, not on the basis of demonstrated landscape values specific to my title.

The Ireneinc Locality Report for Margate does not identify any specific landscape values on my title. The landscape value assessment is made at locality level without reference to the characteristics of my individual property.

D1.3 — The RLZ is the appropriate zone under the Zone Guidelines (RLZ 1 and RLZ 2(b))

Zone Guideline RLZ 1(a) provides that the RLZ should be applied to residential areas with larger lots where the existing and intended use is a mix between residential and lower order rural activities, with priority given to the protection of residential amenity. This description accurately characterises my property.

Zone Guideline RLZ 2(b) further provides that the RLZ may be applied to land within the ELZ in an interim planning scheme where the primary strategic intention is for residential use and development within a rural setting and a similar minimum allowable lot size is being applied. My property satisfies both elements of this criterion.

My property has an area of 6.3 ha. This is consistent with the RLZ C minimum lot size of 5 ha and does not provide for further subdivision under that subcategory.

D2 — The Ireneinc evaluation framework, applied correctly to my property, supports RLZ

The Ireneinc report applies an evaluation pathway (decision tree) to determine the appropriate zone. The Commission was told at Day 20 of the hearing that this framework is not a statutory instrument — it is a tool, not a rule [Kate Heckelmann, Transcript Day 20, 05:53:00]. Representations can depart from it with good evidence. However, I submit that even applying the framework as intended, my property satisfies the criteria for RLZ rather than LCZ.

D2.1 — My property has a strategic residential intention

The first decision point in the Ireneinc evaluation pathway asks whether there is a strategic intention for residential use.

The report identifies visual evidence of existing residential use and known strategic intention as the relevant indicators. My property clearly satisfies this criterion.

My property contains an established dwelling, associated outbuildings including shed, a greenhouse, woodshed, and large cleared areas of three separate fruit trees and vegetable gardens established in 2012 all fully fenced off, ariel photos will show you over a period of 15 years confirms the consistently residential character of the property.

The forest area on my land is minimal compared to the lot size; the forest area is in the back of the property to the west going down to a creek and not in sight from the Channel.

D2.2 — My property has the characteristics of a rural living settlement

The Ireneinc framework identifies rural living settlement characteristics as: at least 10 smaller blocks generally ranging in size between 1–15 ha with a consistent lot pattern; a consistent pattern of detached dwellings with associated outbuildings; and visual evidence of rural activities (cleared areas, hobby farming, grazing etc.).

The Ireneinc report's own locality baseline confirms that the broader settlement in which my property sits displays these characteristics.

My property is at end of [REDACTED] and situated with 19 properties along [REDACTED] ([REDACTED] is only 2 km long and stops at a dead end), all 19 [REDACTED] properties including mine each with lot sizes ranging from approximately 2 ha to 10 ha with only two of the nineteen properties acceding over 10ha.

The settlement pattern is consistent and has been established since late 1980s, all my neighbouring properties contain detached dwellings with associated rural activities including hobby farms, grazing paddocks and orchards.

None of these properties should be deemed LCZ.

My property and neighbouring properties have the characteristics of a rural living settlement, just to a RLZ.

D2.3 — The identified landscape values can be managed outside of LCZ

The Ireneinc evaluation framework requires consideration of whether identified landscape values can be appropriately managed outside of LCZ, specifically through the Natural Assets Code (NAC), the Scenic Protection Code (SPC), or a Specific Area Plan (SAP).

The Commission itself accepted this argument in relation to Kettering West at Day 20, where the panel effectively found that the Priority Vegetation Area (PVA) overlay does the landscape-protection work, not the zone [Transcript, Day 20, 02:33:54].

My property is within a Scenic Protection Area (SPA). It is subjected to the NAC/PVA overlay.

These overlay controls provide adequate management of any landscape values present, without the need for the more restricted LCZ.

2/3 of my property was cleared by previous owner, I have cultivated, developed and kept this cleared area for 15 years. There is very limited native vegetation on the title.

The landscape values identified in the Ireneinc locality baseline relate to the property bordering the northwest side to my property is a Nature Recreation Area and does not characterise my title.

D2.4 — The RLZ subcategory provides for limited or no further subdivision

The Ireneinc framework identifies as a key RLZ suitability indicator that the transition 'would result in limited/no further subdivision' and that 'a similar minimum allowable lot size is being applied.' Applying RLZ C to my property achieves this outcome, as the minimum lot size under that subcategory is consistent with the existing lot size and does not create a viable subdivision pathway.

My property has an area of 6.3 ha. Under RLZ C, the minimum lot size is 5ha. Subdivision of my property under this subcategory would not be possible, addressing any concern about intensification.

My preferred RLZ subcategory does not enable further subdivision.

D3 — The TPC panel's own statements support RLZ for properties like mine

The following exchanges from the Day 19 and Day 20 TPC hearings directly support the argument that the RLZ is more appropriate than the LCZ for my property.

These statements were made by TPC Commissioners and are on the public record.

D3.1 — The evaluation framework is not a statutory instrument

Kate Heckelmann (Ireneinc) conceded at Day 20 [05:53:00] that the evaluation framework is not a statutory instrument — it is a tool, not a rule.

The Commission is not bound by its application in any individual case and must assess my property against the statutory criteria in section 34 of LUPAA and the Zone Guidelines.

D3.2 — Risk ratings are judgement calls, not defined thresholds

At Day 20, the low/medium/high risk ratings applied by Ireneinc to LCZ recommendations were described as judgement calls, not defined thresholds. Ireneinc's position was that these ratings are a rule of thumb only [Day 20 guide].

The Commission has not yet determined what weight to give these ratings. Where the risk rating applied to my locality is medium or high, this is not a determinative finding — it is an assessment that can be challenged with site-specific evidence.

The Ireneinc report rates the transition of land in my area and land to RLZ is subjected to a certain risk level. I submit that this does not accurately reflect the characteristics of my individual property for the following reasons, my property has a large cleared area established by previous owner, and cultivated by me, a 5 m wide firebreak trail around the whole and only the cleared area that is 2/3 of the whole lot size. In this cleared area (done not by me but by the previous owner during the subdivision of this area in 2010), I have just kept the maintenance up, I have my dwelling, shed, three big enclosed fruit, berry and vegetable gardens, a greenhouse, woodshed, all in this large open area and constantly maintained, the native forest part is predominantly young stringybark and will forever be untouched but only amount to 1/3 of the whole property.

D3.3 — Visible rural activity is not required for RLZ

The TPC panel confirmed at Day 20 that visible rural activity is not a prerequisite for RLZ. This was applied consistently across multiple localities including Howden, Albion Heights, and Kingston West [Day 20 guide].

Properties need not demonstrate active farming or grazing to satisfy the RLZ criteria — residential use in a rural setting is sufficient.

D3.4 — Analogy to accepted RLZ localities

The Ireneinc report recommended full ELZ to RLZ transitions for a number of localities, including Kettering East and Oyster Cove, Howden and Blackmans Bay, Albion Heights, and Tinderbox West.

No questions were asked about these recommendations at the hearing, though this does not indicate acceptance by the Commission.

The characteristics of those localities — established residential settlement, lots generally between 1 and 15 ha, mixed residential and rural activities, limited evidence of significant landscape values requiring LCZ protection — are shared by my property.

My property in Margate is directly comparable to properties like Albion Heights, Howden and Oyster Cove where RLZ was recommended. Both areas share the following characteristics to lot size, settlement, pattern, proximity to existing RLZ, absent of significant landscape values.

There is no principled basis on which to treat my property differently.

D4 — Consistency and fragmentation arguments

D4.1 — Fragmented LCZ application should be resolved in favour of the surrounding zone

The Ireneinc report itself identifies avoidance of fragmented LCZ application as a key principle.

The report notes that areas where only 2–3 LCZ-zoned properties are surrounded by Rural Zone (RZ) or RLZ land should be modified to resolve the fragmentation.

Where my property is located within or adjacent to an area predominantly zoned RLZ or RZ, the application of LCZ creates exactly the kind of spot-zoning that the Ireneinc framework seeks to avoid.

My property is part of [REDACTED] community and properties in this area are predominantly under 10ha only two properties are over 10ha and many under RLZ/Rural under the draft LPS.

The application of LCZ to my property and a small cluster of neighbourhood properties creates a fragmented and isolated pocket of LCZ within predominant RLZ/Rural area.

There is also a Private Timber Reserve (PTR) overlay crossing over my property and over all upper [REDACTED] properties.

D4.2 — Inconsistency with adjoining or comparable properties

The Zone Guidelines require that the spatial application of zones be, as far as practicable, consistent with and coordinated across the LPS.

Where neighbouring properties with substantially similar characteristics have been recommended for RLZ, the application of LCZ to my property is inconsistent and not supported by evidence of any material difference.

[REDACTED] property number 17 (CT 17437/3) I understand have had their proposed zoning changed from LCZ to RLZ, their property is 6.5 ha and bigger than my property and with same size area cleared for dwelling, gardens, sheds, etc, with same settlement character and land cover and development history that would justify the different treatment of my property to become RLZ as well.

[REDACTED] property number 19 (19469/1) I understand have had their proposed zoning changed from LCZ to RLZ.

[REDACTED] number 35 (19469/2) I understand have had their proposed zoning changed from LCZ to RLZ, with same cleared area for dwelling, gardens, sheds, etc, with same settlement character and development history that would justify the different treatment of my property to become RLZ as well.

number 24 (29452/3) 19.04ha with Rural recommendation has approximately same size of uncleared bush area as mine but with 3 times the size of land and with same size of area cleared for dwelling, gardens, shed, etc, with same settlement character and land cover and development history that would justify the different treatment of my property to become RLZ.

Just to clarify three of these neighbouring properties mentioned above with the owners I know well, and my comparison is by real experience on site.

D5 — Council's approach has been historically inconsistent

The Ireneinc LCZ Review report documents a significant evolution — and inconsistency — in Council's approach to the application of the LCZ to ELZ land.

At the time the draft LPS was first submitted to the TPC in 2020, approximately 85% of ELZ parcels were proposed for LCZ.

The TPC noted that this approach was often inconsistent with the Zone Guidelines and that 'often when assessing particular sites the zone proposed does not seem to match these criteria or those of Guideline No.1.

' By the time of public exhibition the proportion had been reduced to approximately 75%, with the balance transitioning to RLZ, RZ, and other zones.

This history demonstrates that the initial presumption in favour of LCZ was not well-founded and that the LCZ application has been progressively narrowed as the evidence base has been tested.

The Ireneinc report represents a further iteration of this process, but where the evidence specific to my property supports RLZ, the LCZ recommendation should not be allowed to stand.

D6 — Any landscape values present can be managed without LCZ

Where landscape values are present on or near my property, I submit that they can be appropriately managed through the application of the relevant overlay controls, without the need for LCZ.

The TPC panel acknowledged on Day 20 [02:33:54] that the PVA overlay and SPC do the landscape-protection work in many cases, removing the justification for LCZ in those areas.

Ireneinc itself acknowledged in the LCZ Review report that a future rural living settlement review may reconsider current RLZ decisions, and that any short-term risk is 'not something that's a definitive or a risk that can't be mitigated with future action' [Transcript, 03:06:18].

This acknowledgement of residual risk mitigation further supports the appropriateness of RLZ rather than LCZ for my property.

My property is within the (SPA/PVA overlay /subject to the NAC). These controls (describe what they regulate) The combined effect of RLZ zoning and these overlay controls is sufficient to manage any landscape values identified in the locality baseline without resort to LCZ.

The LCZ is intended for land where the priority is protection of landscape and vegetation values and where development is limited. Given the property bought in 2011 and developed, with the existing dwelling, a large cleared residential curtilage, access infrastructure, several large fully enclosed fruit tree gardens, shed, greenhouse, woodshed, in a large open cleared area the size of 2/3 of the property, the subject land does not exhibit the characteristics typically associated with LCZ land.

This residential use aligns with the intent of the Rural Living Zone (RLZ).

D7 — Inconsistency in the Ireneinc evaluation framework (Attachment A)

A formal inconsistency analysis has been prepared and is attached to this submission as Attachment A. That analysis compares the landscape value descriptions, settlement characteristics, lot sizes, SPA coverage, PVA/NAC overlay coverage, and risk ratings applied by Ireneinc to this locality against one or more similar localities that received a more favourable zone outcome using the same or near-identical evidence.

The analysis draws on the following key statements from the Day 20 TPC hearing:

- Commissioner Rohan Probert [01:07:48]: Directly identified that landscape descriptions for Tinderbox East and Howden are near-identical yet produced opposite zone outcomes, asking Ireneinc to identify the actual difference between those two. This principle applies to the inconsistency documented in Attachment A for this locality.
-
- Commissioner Dan Ford [02:33:54]: Forced the concession that the PVA overlay does the landscape-protection work, not the zone. This principle applies where PVA overlay is present on my property.
-
- Kate Heckelmann (Ireneinc) [05:53:00]: The evaluation framework is a tool, not a statutory instrument. Submissions can depart from it with good evidence.
-

As documented in Attachment A -Margate section, the comparison with Electrona shows that Ireneinc applied near-identical landscape value descriptions and settlement findings to both localities yet recommend LCZ for Margate and RLZ for Electrona.

The sole differentiator cited, the elevated and visually prominent ridgeline landscape character associated with area such as Van Morey Road- does not apply to my individual property in a manner that justifies LCZ, because the land is already developed and used for residential purposes, forms part of an established rural-residential settlement pattern, and is subject to existing planning controls that adequately manage visual and landscape impact.

I request that the Commission have regard to Attachment A in assessing this submission, and in particular to the specific comparison rows identified above, which demonstrate that the Ireneinc recommendation for this locality is inconsistent with the outcome produced by the same evaluation framework applied to comparable localities elsewhere in the municipality.

PART E - LOCALITY-SPECIFIC CONTEXT

Private Timber Reserve (PTR) overlay.

My land is declared Private Timber Reserve under the Forest Practices Act 1985 and was actively managed for timber production, sawmilling and firewood collection by previous owner. This represents a past low-intensity primary production associated with rural residential use and demonstrates that the land was managed for productive outcomes rather than conservation as the dominant purpose.

It is noted that the Ireneinc review states that PTR status does not dictate the underlying zoning should instead be on land characteristics. While this is acknowledged, assessing individual land characteristics from a desktop survey does not adequately assess the existing use, management and individual characteristics of the property.

I use my timber for firewood to produce hot water and warmth to my dwelling.

Section 20(7) of the Land Use Planning and Approvals Act 1993 provides that planning scheme and applying the LCZ to the land creates an inconsistent planning outcome.

My property contains native regrowth vegetation; however, this should not equate to the automatic application of a conservation zone. The declaration of a PTR is a formal recognition of overlay that is a witness of past activities on this land and explains the low value of the land.

The property and surrounding locality were historically logged 40 years ago and is now characterised by regrowth vegetation rather than undisturbed native forest.

This reduces the relative landscape sensitivity compared to intact vegetation and supports the suitability of RLZ.

The LCZ is intended for land where the priority is protection of landscape and vegetation values and where development is limited, applying RLZ is matching this property's qualities and values.

Property's history and present state.

Given the property's history, owned by the McGowans family pre- logging, logging, developed for residential use, bought by me in 2011, existing dwelling, a large cleared residential curtilage, access infrastructure, several large fully enclosed fruit tree gardens, shed, greenhouse, woodshed, in a large open cleared area the size of 2/3 of the property, the subject land does not exhibit the characteristics typically associated with LCZ land.

This residential use aligns with the intent of the Rural Living Zone (RLC).

Serviced Road issue.

The properties in this area including mine rely on a Private and Crown Road for legal access to properties, which is allowed under the TPS in line with their residential nature.

The misapplication of the Landscape Conservation Zone or Rural Zone mandates a different road configuration to match the uses permitted in those more intense zones.

Under the TPS, both the Rural Zone and the Landscape Conservation Zone require that access to a dwelling be via; a constructed public road, or a constructed private road secured by freehold title or a registered right-of-way.

Noting that a Crown licence does not satisfy this requirement, this raises several implications: A dwelling upgrade is not approvable under the Landscape Conservation Zone or Rural Zone. If it were even possible, the cost for a formalisation or upgrade to the road access would be prohibitive in the extreme and would constitute a de facto extinguishing of any existing rights to construct or upgrade a dwelling on these properties.

The existing Crown Road access is consistent with rural residential use and the Rural Living Zone, but not with the Landscape Conservation or Rural Zone.

This was overlooked in the Ireneinc Report and is another reason why the current recommendation is not appropriate for this locality, the only recommendation should be Rural Living Zone.

Under section 8A LPS Guidelines. LCZ 4: the LCZ should not apply to:

1. (a) land where the priority is for residential use and development (RLZ);

This section of Zone Guidelines also includes the following notes to be considered in the application of the zone in planning scheme:

The LCZ is not a large lot residential zone, in areas characterised by native vegetation cover and other landscape value. Instead, the LCZ provides clear priority for the protection of landscape values and for complementary use or development, with residential use largely being discretionary.

My property is inconsistent with LCZ as the primary use is residential in a large lot residential area. I submit that the Ireneinc Report recommendation to include my property within RLZ is correct and consistent with the following Rural Living Zone Guidelines:

1. Residential area with larger lots where the existing and intended use is a mix between residential and lower-order rural activities, with priority given to the protection of residential amenity.
2. RLZ may be applied to ELZ land where the primary strategic intention is for the residential use and development within a rural setting.

In conclusion, I respectfully request that the Commission adopt the Ireneinc Report recommendation and include my property within the RLZ in the Kingborough Local Provisions Schedule.

I am one of 14 landowners in [REDACTED] and Old Bernies Road Margate who have jointly lodged a Collective Group Submission, I adopt the arguments in that collective submission and incorporate them into my individual submission by reference as Attachment B.

CONCLUSION AND RELIEF SOUGHT

For the reasons set out above, I submit that:

1. The application of the LCZ to my property is inconsistent with the Zone Guidelines (Guideline No. 1) and does not satisfy the requirements of section 34 of LUPAA.
2. The LCZ is prohibited by Zone Guideline LCZ 4(a) where, as here, the priority of the land is residential use.
3. The Rural Living Zone satisfies the criteria in Zone Guidelines RLZ 1(a) and RLZ 2(b) and is the appropriate zone for my property.
4. Any landscape values identified in the locality can be appropriately managed through existing overlay controls without resort to LCZ.

I respectfully request that the Commission:

- Determine that the draft Kingborough LPS should be modified to include my property within the Rural Living Zone C.
-
- If the Commission proposes any alternative outcome, that I be provided with an opportunity to respond before any final determination is made.
-

I request that the folio of the Register [REDACTED] at [REDACTED] Margate be included within the Rural Living Zone C in the Kingborough Local Provision.

Signed:

[REDACTED]

Siri Anne Bjorhusdal

Date:

02/05-2026

Contact email / phone:

[REDACTED]

WRITTEN SUBMISSION TO THE TASMANIAN PLANNING COMMISSION

Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report

COLLECTIVE COVER SUBMISSION

Locality	██████████ and Old Bernies Rd, Margate
Submission type	Collective cover submission — Direction 69 / Ireneinc Report
Number of landowners	14
Lodgement date	3 May 2026
Contact person for this group	Simon Sprent, ████████████████████ ██████████

The following landowners are parties to this collective submission. Majority of landowners have also lodged their own individual submission addressing their specific property.

Full name	Property address	Title reference	Zone proposed (Ireneinc)	Zone sought
Amanda and Sam Thompson	██████████ ██████████	██████████	LCZ	RLZ
Siri Bjorhusdal	██████████	██████████	LCZ	RLZ
Zoe Barker	██████████ ██████████	██████████	LCZ	RLZ
James Aherne	██████████	██████████	LCZ	RLZ
Amanda Wass	██████████	██████████	LCZ	RLZ
Ricky and Katie Dunbar	██████████	██████████	LCZ	RLZ
Simon and Bruna Sprent	██████████	██████████	LCZ	RLZ
Yvonne and Sean Conry	██████████	██████████	LCZ	RLZ
Richard and Donna Jupe	██████████	██████████	LCZ	RLZ
Paul and Erica Coull	██████████	██████████ /	LCZ	RLZ
Ben Woodhouse	██████████	██████████	LCZ	RLZ
Phillip Worsley	██████████	██████████	LCZ	RLZ

Full name	Property address	Title reference	Zone proposed (Ireneinc)	Zone sought
Tim Robertson	██████████	██████████	LCZ	RLZ
Morris Worsley	██████████	██████████	LCZ	RLZ

We are a group of neighbouring landowners in the MARGATE locality. We have each received a letter from the Tasmanian Planning Commission (TPC) advising that the Ireneinc report has recommended a zone for our property as part of the Kingborough Local Provisions Schedule (LPS).

We are lodging this collective submission to present our shared position to the Commission. Our properties share a common settlement character and landscape context, and we believe the same zone outcome is appropriate for all of them.

Majority of us have also lodged an individual submission using the appropriate individual template. Those individual submissions contain the property-specific evidence for each title. This collective submission is not a substitute for those individual submissions — it sits alongside them.

The properties listed in Part 2 share the following characteristics. We ask the Commission to have regard to these shared characteristics when considering each of our individual submissions.

Our properties form part of an established residential settlement along ██████████ and Old Bernies Rd. The pattern of development includes 14 residential lots, most of which contain a dwelling. This settlement has existed in its current form for up to 16 years.

Majority of Lot sizes in our group range from 4.09ha to 10ha. These lot sizes are consistent with the Rural Living Zone (RLZ)

All 14 properties in our group contain existing dwellings used as permanent residences. Most properties also include hobby farming / grazing / gardens / outbuildings/ water tanks/ orchards. None of the properties are used for commercial agriculture or resource extraction."

Our properties are predominately partially vegetated and contain patches of native vegetation. The vegetation on our titles does not include significant native vegetation that would require LCZ to protect it.

The following overlays apply to majority of our properties, Private Timber Reserve (PTR) these overlays already protect landscape values — they are relevant to the argument in Part 5 below.

Our properties are also covered under SPC and NAC

Our properties are very close to already zoned Rural Living Zone (RLZ) under the draft LPS. The closest one to us is the Kaoota/Pelverata areas. The existing RLZ in Kaoota has larger lot sizes, but the settlement character, and landscape values are consistent to our properties."

The following arguments apply to all properties listed in Part 2. They are presented here as shared arguments so that the Commission can consider them once, rather than across multiple individual submissions. Each signatory's individual submission builds on these shared arguments with property-specific evidence.

Zone Guideline RLZ 1(a) provides that the RLZ should be applied to residential areas with larger lots where the existing and intended use is a mix between residential and lower-order rural activities (such as hobby farming), and where priority is given to residential amenity.

Zone Guideline RLZ 2(b) further provides that the RLZ may be applied to land within the Environmental Living Zone (ELZ) in an interim planning scheme where the primary strategic intention is for residential use and development within a rural setting, and a similar minimum lot size is applied.

Our properties satisfy both criteria. The shared characteristics described in Part 4 above demonstrate that our properties have an established residential settlement pattern, lots of a size consistent with RLZ subcategories, and a primary use and intention that is residential.

The Ireneinc report itself identifies avoidance of fragmented zone application as a key principle. The report notes that areas where only two or three LCZ-zoned properties are surrounded by Rural Zone or RLZ land should be resolved in favour of the surrounding zone.

Our properties form a coherent, contiguous group. If some of our properties receive a different zone outcome from others — or from the surrounding land — the result will be a fragmented and inconsistent zone pattern. This would be contrary to the Zone Guidelines, which require that the spatial application of zones be, as far as practicable, consistent and coordinated across the LPS.

Our 14 properties are surrounded on the north by land already recommended for [RLZ / Rural Zone]. Applying LCZ to our properties would create an isolated pocket of LCZ within a predominantly RLZ

The Tasmanian Planning Commission is required under section 34(2)(g) of the Land Use Planning and Approvals Act 1993 (LUPAA) to ensure that the spatial application of zones is, as far as practicable, consistent and coordinated. This means the Commission must consider whether our locality has been treated the same way as localities with similar characteristics elsewhere in Tasmania.

We submit that Pelverata/Kaoota is the most comparable locality to ours. Like our properties, properties in Pelverata/Kaooota have shared features — e.g. lot sizes of 2–10ha, established dwellings, similar landscape character, similar overlay coverage. Ireneinc recommended [RLZ / Rural Zone] for this area, and that recommendation was not challenged at the Day 2 hearing. There is no clear basis for treating our locality differently. We request that the Commission apply the same reasoning here.

Kate Heckelmann of Ireneinc confirmed at the Day 2 TPC hearing [05:53:00] that the evaluation framework used to produce the zone recommendations is a tool, not a statutory instrument. It is not the legal test the Commission must apply. The legal test is the LPS criteria set out in section 34 of LUPAA, which include compliance with the Zone Guidelines (Guideline No. 1). The Commission is not bound by the Ireneinc framework or its outputs.

We submit that if the Commission applies the Zone Guidelines directly to the shared characteristics of our properties, as set out in Part 4 above, it will find that [RLZ / Rural Zone] is the appropriate zone. Any departure from the Ireneinc recommendation in our favour is well within the Commission's proper exercise of its statutory role.

Chair Nick Heath confirmed at the Day 2 hearing [06:45:48] that the Commission will decide this matter on the basis of the LPS criteria set out in section 34 of LUPAA. He explicitly noted that Council's position — including its 16 March 2026 resolution favouring the 'least restrictive alternative' — is not binding on the Commission. The Commission will reach its own independent assessment based on the evidence before it, including the evidence in this submission and in each of our individual submissions.

The following comments made by TPC delegates or Ireneinc at the Day 2 hearing on 16 April 2026 are directly relevant to our locality and our submission. We ask the Commission to have regard to these comments.

We collectively request that the Commission:

- Have regard to the shared characteristics and shared arguments set out in this collective submission when assessing each of our individual submissions.
- Organise the hearing for our locality so that our group can present collectively as well as individually, as Chair Heath invited at the Day 2 hearing [06:55:53].

Thank you for your time in reading our submission,

Kind regards

Simon Sprent

On behalf of the landowners on [REDACTED] and Old Bernies Rd, as stated above.

LOCALITY REFERENCE GUIDE

KINGBOROUGH LPS — PART E INSERT

Direction 69 / Ireneinc Report — All 20 Mainland Localities

⚠ DEADLINE: All submissions must be lodged by midnight Monday 4 May 2026.

HOW TO USE THIS GUIDE: Find the locality that matches your property. Use the information in each locality entry to complete Part E of your submission template. This guide draws on the Ireneinc Reports, the Day 19 and Day 20 hearing guides, and the full hearing transcript. Always verify against primary source documents before lodging. This guide does NOT replace the submission templates — use it alongside them.

GLOSSARY — Abbreviations and terms used in this guide

ELZ	Environmental Living Zone — the former zone under the Kingborough Interim Planning Scheme 2015 (KIPS2015) that applied to most of the land covered by this guide. The ELZ no longer exists under the Tasmanian Planning Scheme.
EMZ	Environmental Management Zone — a zone under the Tasmanian Planning Scheme that applies to land with high environmental values, such as nature reserves and conservation areas.
Ireneinc	The planning consultancy engaged by Kingborough Council to review which zones should apply to former Environmental Living Zone land.
KIPS2015	Kingborough Interim Planning Scheme 2015 — the planning scheme that applied to Kingborough until the new Local Provisions Schedule (LPS) takes effect.
LCZ	Landscape Conservation Zone
LDRZ	Low Density Residential Zone
LPS	Local Provisions Schedule — the document that sets out zone maps and local planning rules for a specific council area under the Tasmanian Planning Scheme.
LUPAA	Land Use Planning and Approvals Act 1993 — the Tasmanian legislation that governs planning schemes. Section 34 of LUPAA sets out the criteria the TPC must apply when assessing the LPS.
NAC	Natural Assets Code — a planning code under the Tasmanian Planning Scheme that protects native vegetation and waterways. Can operate as an alternative to LCZ for managing natural values.
PPZ	Particular Purpose Zone
PVA	Priority Vegetation Area — an overlay that identifies land with significant native vegetation. Where a PVA overlay applies, it protects vegetation values independently of what zone applies.
RLZ	Rural Living Zone
RZ	Rural Zone
SAP	Specific Area Plan — a type of local planning provision that applies tailored rules to a defined area within a zone.
SPA	Scenic Protection Area — an overlay that identifies land within a recognised scenic landscape. SPA coverage is a key factor in many of the zone recommendations covered in this guide.
STRLUS	Southern Tasmania Regional Land Use Strategy
TPC	Tasmanian Planning Commission
UGB	Urban Growth Boundary — a boundary that defines the outer limit of planned urban expansion. LCZ applied to land inside the UGB is generally considered out of place under STRLUS.

OUTCOME KEY: Green = Ireneinc recommended RLZ, not challenged at hearing RLZ recommendation (strong precedent for RLZ arguments). Orange/Mix = Ireneinc recommended a mixed outcome (check sub-area carefully). Red = Ireneinc recommended LCZ retention, not challenged at hearing (harder case — focus on site-specific evidence). Blue/Rural = Ireneinc recommended a Rural Zone component (useful for T2/T4 templates).

REGION 1 — KINGBOROUGH BUSHLAND SURROUNDS

1. Kingston & Kingston Beach

✗ RECOMMENDED — LCZ	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	LCZ retained — small locality surrounded by urban residential; inside Urban Growth Boundary
TPC Day 2 outcome	Accepted with out-of-place flag — panel noted LCZ inside UGB is technically inconsistent with STRLUS but not resolved at this hearing [04:17:00–04:25:00]
Lot sizes	1–6 ha; predominantly residential uses on large bushland lots
Landscape values	Significant bushland character; connects to Boronia Hill Park; surrounded by General and Low Density Residential zones
Scenic Protection Area	Check Ireneinc mapping — partial coverage
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

LCZ retained for all ELZ parcels. The locality is small, surrounded by urban zones, and inside the Urban Growth Boundary. No RLZ or Rural Zone transitions recommended.

TPC Day 2 hearing — panel comment:

The LCZ recommendation was not challenged at the hearing, but the panel flagged it as out of place given its location inside the UGB. Dan Ford noted at [04:17:00] that LCZ inside the UGB is inconsistent with STRLUS and not resolved at this hearing for this process. This creates a contestable basis: if LCZ is acknowledged as STRLUS-inconsistent even by the panel, any landscape values must be particularly compelling to justify it.

Key arguments available for submissions in this locality:

- The panel's own acknowledgement that LCZ inside the UGB is STRLUS-inconsistent [04:17:00] is your strongest argument — cite this directly
- Individual small cleared residential lots inside LCZ can still be argued out — panel flagged case-by-case flex [05:50:30]
- Argue that landscape values on your individual title do not meet LCZ 1 threshold — focus on what is NOT on your specific lot
- If your lot is cleared or developed with no significant vegetation, argue LCZ 2(c) primary intention is residential not conservation
- No RLZ transitions in this locality — so T1 is your template arguing from scratch

Most useful for templates:

T1 (contest LCZ, seek RLZ). Difficult locality — site-specific evidence essential.

2. Albion Heights & Bonnet Hill

✓ RECOMMENDED — RLZ	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	Full ELZ → RLZ (no further subdivision); LDRZ pocket along Channel Highway retained
TPC Day 2 outcome	Ireneinc RLZ recommendation not challenged; LDRZ pocket separately questioned [04:29:00–04:38:00]
Lot sizes	Generally 1–5 ha; consistent residential settlement pattern

Landscape values	Present but manageable by codes — Ireneinc found sufficient scheme mechanisms exist
Scenic Protection Area	Partial — check individual lot mapping
Ireneinc risk rating	Medium — Ireneinc applied on basis that minimum lot size prevents further subdivision

Ireneinc recommendation:

Full ELZ transition to RLZ recommended. Ireneinc found rural living settlement characteristics present, located between higher-intensity residential uses, and landscape values manageable by existing codes. RLZ applied with minimum lot size providing for no further subdivision.

TPC Day 2 hearing — panel comment:

The Ireneinc RLZ recommendation was not questioned at the hearing [04:29:00–04:38:00]. This is one of the clearest RLZ recommendations of the day. The LDRZ pocket along Channel Highway was separately contested.

Key arguments available for submissions in this locality:

- Strong precedent: Ireneinc recommended full RLZ here without challenge — cite as a comparable locality for any neighbouring LCZ-affected property
- Ireneinc's own reasoning applies: rural living settlement characteristics present, located near higher-intensity residential, landscape values manageable by codes
- If your property is in the Bonnet Hill LDRZ pocket outside the UGB, the panel flagged this as STRLUS-inconsistent and put Council on notice to revisit [04:41:40–04:46:15] — strong argument for change
- Landscape values managed by scheme codes argument was put forward here without challenge — useful for any RLZ submissions in this region

Most useful for templates:

T5 (accept RLZ, argue subcategory). If your property was recommended for LCZ while others in Albion Heights got RLZ, use T1 and cite this locality as a comparable example.

3. Taroona & Kingston North

X RECOMMENDED — LCZ	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	LCZ retained for majority; small group of rural-use parcels may transition to Rural Zone
TPC Day 2 outcome	Not challenged — medium-to-high risk rating; panel noted alignment with Hobart City Council zonings across the boundary
Lot sizes	Varies — mix of large residential and smaller lots near Channel Highway
Landscape values	Significant — elevated bushland, ridgeline views, connects to Hobart boundary; eastern parcels considered highest landscape value
Scenic Protection Area	Significant coverage — check individual lot
Ireneinc risk rating	Medium-to-high for most parcels

Ireneinc recommendation:

LCZ retained across most of the locality. Ireneinc noted a small group of rural-use parcels on the western portion could transition to Rural Zone, as existing rural farming practices occur. Eastern parcels (adjacent to coastline/urban interface) firmly retained in LCZ given significant landscape values and absence of code coverage. Ireneinc acknowledged future exploration of alternate zoning (similar to PPZ) could better manage the interface between landscape and residential uses.

TPC Day 2 hearing — panel comment:

The LCZ recommendation was not challenged at the hearing. The panel noted the alignment with Hobart City Council's zoning across the municipal boundary. However, the panel did not close the door on case-by-case arguments for rural-character parcels on the western side.

Key arguments available for submissions in this locality:

- For western rural-character parcels: Ireneinc itself noted Rural Zone could be appropriate where existing rural farming practices occur — cite this acknowledgement directly
- Ireneinc's acknowledgement that future PPZ-like zoning could better manage the interface is evidence that LCZ alone is not an adequate solution
- For eastern parcels: argument is harder — focus on whether your specific title has the scenic or bushland values cited, or whether it is cleared/developed
- Absence of Scenic Protection Area on eastern parcels (no SPA coverage on east coast) was the specific reason Ireneinc gave — check your lot's SPA coverage
- Argue landscape values manageable by NAC and PVA overlay if your title has limited native vegetation

Most useful for templates:

T1 (contest LCZ, seek RLZ) for western rural parcels. T2 (contest LCZ, seek Rural Zone) where rural activities exist. Eastern parcels: T1 with strong site-specific evidence needed.

4. Kingston West

~ RECOMMENDED — MIXED	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	Mix: LCZ for elevated/vegetated blocks; RLZ for residential cluster; extra western parcels → RLZ
TPC Day 2 outcome	Ireneinc recommendation not challenged; Chair Heath noted individual cleared lots inside LCZ can be argued case by case [05:50:30]
Lot sizes	Variable — 1–15 ha range; western residential cluster has smaller lots
Landscape values	Significant on elevated and vegetated portions; less significant on cleared western residential parcels
Scenic Protection Area	Check individual lot — partial coverage
Ireneinc risk rating	Medium

Ireneinc recommendation:

Mixed outcome. LCZ applied to elevated, vegetated, and visually prominent blocks. RLZ applied to established residential cluster and extended to additional western parcels. Chair Heath noted that individual small cleared residential lots still inside LCZ could be argued through submissions.

TPC Day 2 hearing — panel comment:

Chair Heath explicitly stated at [05:50:30] that individual small cleared residential lots inside LCZ (such as in Kingston West) can still be argued out via representations. This is the most useful hearing comment for this locality. Panel showed case-by-case flexibility.

Key arguments available for submissions in this locality:

- Chair Heath's explicit comment at [05:50:30] that small cleared residential lots inside LCZ can be argued out via representations is directly relevant here — cite it
- If your lot is predominantly cleared with a dwelling, you are in the strongest position — focus on absence of significant native vegetation on your title
- Argue that your lot's characteristics match the western RLZ cluster that Ireneinc already recommended for RLZ — consistency argument
- Ireneinc's acknowledgement that extra western parcels were added to RLZ supports further expansion — argue your parcel has similar characteristics
- Priority Vegetation Area overlay manages any vegetation — this position was put forward at Kettering West without challenge [02:33:54]

Most useful for templates:

T1 (contest LCZ, seek RLZ) for cleared/residential lots remaining in LCZ. T5 (accept RLZ, argue subcategory) if already recommended for RLZ.

5. Neika

~ RECOMMENDED — MIXED	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	LCZ for bulk; 2 Huon Road parcels → RLZ; 540 Leslie Road split-zone flagged
TPC Day 2 outcome	Ireneinc recommendation not challenged; case-by-case flexibility noted [05:50:30]
Lot sizes	Large — many lots exceed 10 ha; some smaller residential cluster lots
Landscape values	Significant bushland and elevated landscape character; scenic values
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium-high for most parcels

Ireneinc recommendation:

LCZ retained for most of the locality. Two specific Huon Road parcels transitioned to RLZ for consistency with adjoining RLZ. Split-zone approach flagged for 540 Leslie Road (large parcel — cleared portion → RLZ, balance → LCZ). Ireneinc found cleared portions of large parcels have rural living characteristics consistent with adjoining RLZ.

TPC Day 2 hearing — panel comment:

The recommendation was not challenged at the hearing. Case-by-case flexibility for individual cleared residential lots was noted. The split-zone approach for 540 Leslie Road sets a useful precedent for large parcels with both cleared and vegetated portions.

Key arguments available for submissions in this locality:

- If your lot adjoins the existing RLZ on Huon Road — the consistency with adjoining RLZ parcels argument was specifically used by Ireneinc to justify those transitions
- For large lots: Ireneinc accepted the principle that cleared portions of large parcels can be split-zoned to RLZ while vegetated portions retain LCZ — argue this for your property
- If your lot is smaller than 10 ha and predominantly cleared, argue that LCZ is disproportionate and RLZ with high subcategory (D) prevents subdivision
- Reference 1232 and 1328 Huon Road as comparable properties that received RLZ — if yours has similar characteristics, there is no clear reason for different treatment

Most useful for templates:

T1 (contest LCZ, seek RLZ) for cleared lots adjoining RLZ. T5 (accept RLZ, argue subcategory) if on Huon Road cluster.

6. Leslie Vale

~ RECOMMENDED — MIXED	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	As exhibited — existing RLZ + LCZ mix retained; no further changes
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]

Lot sizes	Mix — RLZ areas have lots consistent with existing RLZ subcategory patterns; LCZ areas are larger with more vegetation
Landscape values	Present in LCZ portions — bushland, native vegetation, scenic values
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Generally medium

Ireneinc recommendation:

The exhibited planning scheme zoning is generally supported with no recommended alterations. The existing mix of RLZ and LCZ is considered to align with the evaluation framework. 540 Leslie Road is noted as a large parcel appropriate for LCZ on the basis of its size (>20 ha), extensive vegetation, and connection to EMZ land to the northeast.

TPC Day 2 hearing — panel comment:

No questions were raised about the Leslie Vale locality at Day 2.

Key arguments available for submissions in this locality:

- If your property is in the LCZ portion: focus on whether it is significantly different from the adjoining RLZ parcels — the exhibited zoning was accepted as correct, so you need strong site-specific evidence
- If your lot is smaller than 20 ha and lacks extensive native vegetation: argue that LCZ 3 (group of titles less than minimum lot size) does not apply and your lot should transition to RLZ
- Refer to the 540 Leslie Road rationale — if your lot does NOT share those characteristics (large, extensively vegetated, connected to EMZ), argue the same reasoning does not apply to you
- Consistency argument: if adjoining RLZ properties share similar characteristics to your LCZ lot, argue no clear reason for different treatment

Most useful for templates:

T1 (contest LCZ, seek RLZ) with strong site-specific evidence required.

7. Allens Rivulet

~ RECOMMENDED — MIXED	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	Mix: RLZ (Mountain Road & Allens Rivulet Road parcels in part); Rural Zone (red group); LCZ balance
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	Variable — mix of smaller residential lots and larger rural parcels
Landscape values	Present across much of locality — bushland, native vegetation
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium

Ireneinc recommendation:

Mixed outcome. Specific parcels on Mountain Road and Allens Rivulet Road transitioned to RLZ for consistency with adjoining RLZ. A group of parcels transitioned to Rural Zone where existing rural activities dominate. The balance retained in LCZ. Ireneinc specifically identified that the RLZ transitions provide consistency with adjoining RLZ parcels with similar characteristics.

TPC Day 2 hearing — panel comment:

No questions were raised about Allens Rivulet at the hearing. The outcome is useful as a reference for consistency arguments — Ireneinc applied RLZ to some parcels and Rural Zone to others based on the distinction between residential character and rural activity character.

Key arguments available for submissions in this locality:

- For lots on or near Mountain Road / Allens Rivulet Road that were recommended for RLZ: if your property was not included but shares the same characteristics, argue consistency — the Ireneinc reasoning applies equally to your parcel
- Rural Zone was applied to the 'red group' with existing rural activities — if your property has rural activity character (grazing, farming), argue Rural Zone rather than LCZ (use T2)
- Ireneinc's distinction between residential-character parcels (→ RLZ) and rural-activity parcels (→ Rural Zone) is explicit here — identify which category your lot falls in and use the corresponding template
- Fragmentation avoidance principle: if your LCZ lot is isolated within a predominantly RLZ or Rural Zone area, cite the fragmentation argument

Most useful for templates:

T1 (contest LCZ, seek RLZ) for residential-character lots. T2 (contest LCZ, seek Rural Zone) for rural-activity lots. T5 (accept RLZ, argue subcategory) if already recommended for RLZ.

8. Sandfly & Kaoota

~ RECOMMENDED — MIXED	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	Mix: RLZ (Pregnall's Road / Talbots Road cluster); Rural Zone split on Halls Track, Pioneer Road, Huon Road, Thompson Road; LCZ balance
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	Variable — Pregnall's/Talbots cluster has smaller lots (2–8 ha); outer rural areas have larger lots
Landscape values	Significant across much of locality — elevated bushland, scenic views
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

Complex mixed outcome. Pregnall's Road and Talbots Road residential cluster → RLZ. Halls Track Road, Pioneer Road, Huon Road, and Thompson Road parcels split between Rural Zone and LCZ. The Rural Zone was applied where existing rural activities (grazing, farming) dominate. LCZ retained for vegetated, elevated parcels with significant landscape values.

TPC Day 2 hearing — panel comment:

No questions were raised about this locality at the hearing. The detailed sub-locality breakdown in Ireneinc's Locality Report for Sandfly is particularly useful — different roads received different outcomes based on clear reasoning that can be applied to individual lots.

Key arguments available for submissions in this locality:

- Pregnall's / Talbots Road cluster: strong RLZ precedent — if your lot is in or adjacent to this cluster, consistency argument is very strong
- Halls Track / Huon Road / Thompson Road: Rural Zone applied where rural activities dominate — if your lot has rural activity character, argue Rural Zone (T2)
- For LCZ-retained lots: check whether your lot actually has the landscape values cited (elevated, vegetated, scenic) — if it is cleared or lower-lying, argue site-specific differentiation
- Ireneinc's Locality Report for Sandfly/Kaoota identifies specific fragmentation concerns — if your LCZ lot sits isolated within Rural Zone or RLZ land, cite this
- Many submissions from this locality opposed LCZ (Reps 198.424, 198.527, 198.647 etc.) — refer to existing submission evidence

Most useful for templates:

T1 (contest LCZ, seek RLZ) for Pregnall's/Talbots Road lots. T2 (contest LCZ, seek Rural Zone) for Halls Track/Huon Road rural parcels. T5 if already recommended for RLZ.

9. Longley & Lower Longley

~ RECOMMENDED — MIXED	Region: Kingston & Bushland Surrounds
Ireneinc recommendation	As exhibited for most; part of 137 Anderson Road → Rural Zone
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	Variable — mix of larger rural parcels and smaller residential lots
Landscape values	Present — elevated landscape, bushland, connection to hinterland
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium

Ireneinc recommendation:

Exhibited zoning generally retained. Part of 137 Anderson Road transitioned to Rural Zone on the basis that existing rural activities occur and Rural Zone better reflects the use. Krauses Road and Huon/Andersons Roads parcels were also transitioned to Rural Zone per TPC modifications. The exhibited LCZ is retained for most of the locality.

TPC Day 2 hearing — panel comment:

No questions were raised about Longley at the hearing. The Anderson Road Rural Zone transition sets a useful precedent for rural-character lots in the locality.

Key arguments available for submissions in this locality:

- If your lot has existing rural activities (grazing, farming) and is currently in LCZ: cite the Anderson Road / Krauses Road precedent — Rural Zone was applied here on that basis (use T2)
- For residential-character lots: if your lot sits near the existing RLZ and shares residential characteristics, argue RLZ consistency (use T1)
- Ireneinc Locality Report notes that Rural Zone was applied to resolve LCZ fragmentation in parts of this locality — apply the same principle to your lot if it is an isolated LCZ parcel
- Check Huon Road and Andersons Road TPC modifications — if your lot is in that area and received Rural Zone, use T4 to fortify that recommendation

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for rural-activity lots. T1 (contest LCZ, seek RLZ) for residential-character lots. T4 (support Rural Zone) if already recommended.

REGION 2 — CHANNEL REGION

10. Tinderbox

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	West side: ELZ → RLZ (no further subdivision). East side: LCZ retained
TPC Day 2 outcome	West: not challenged. East: questioned by panel — weakest LCZ justification of the day [00:35:10–00:47:04]
Lot sizes	Variable — lots along Tinderbox Road generally 1–10 ha
Landscape values	West: manageable by codes. East: elevated, no SPA coverage, building height concern
Scenic Protection Area	West: covered. East: NOT covered — this was the key differentiator
Ireneinc risk rating	West: low-medium. East: medium-high

Ireneinc recommendation:

West side of peninsula: full ELZ → RLZ transition. Lots along western Tinderbox Road align with rural living settlement characteristics and landscape values manageable by codes. East side: LCZ retained — key reason was absence of Scenic Protection Area on east coast and concern that RLZ allows significantly higher building heights than LCZ.

TPC Day 2 hearing — panel comment:

Day 2's most significant moment for this locality: Delegate Dan Ford at [00:35:14] directly challenged Ireneinc on east side, asking 'Specifically, what cannot be managed through those codes for the eastern side?' Kate Heckelmann's answer — the absence of SPA on the east coast and RLZ height allowances — was directly probed by Ford. The panel labelled this the weakest LCZ retention of the day. Ford noted at [00:47:04] that the distinction between east and west isn't clearly visible in the landscape values assessment.

Key arguments available for submissions in this locality:

- East side: Dan Ford's challenge is your best argument — if your lot IS covered by a SPA or has lower-profile development, the height risk argument collapses
- East side: if your lot has lower elevation or is not visually prominent from the water, argue the specific height/elevation rationale does not apply to your title
- East side: argue that building height in RLZ can be controlled by conditions and is not a sufficient reason to impose LCZ — the panel expressed scepticism about this reasoning
- West side: if you are already recommended for RLZ, use T5 and argue the correct subcategory
- The panel's comment that 'there's certainly a more prevalence of residential feel in the Howden area' [01:11:56] — use to argue similar residential feel exists on east side near your lot

Most useful for templates:

East Tinderbox: T1 (contest LCZ, seek RLZ) with strong site-specific evidence — this is a contestable case. West Tinderbox: T5 (accept RLZ, argue subcategory).

11. Howden & Blackmans Bay

✓ RECOMMENDED — RLZ	Region: Channel Region
Ireneinc recommendation	Full ELZ → RLZ (no further subdivision); medium risk accepted
TPC Day 2 outcome	Not challenged at hearing [00:59:00–01:03:00]

Lot sizes	Generally 1–5 ha along Howden Road, Olearia Drive, Brightwater Road, Richea Court, Alanwood Road, Carison Court
Landscape values	Present (distinctive vegetative ridgeline, residential settlement pattern) — found manageable by codes
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium — Ireneinc applied on basis of RLZ minimum lot size preventing further subdivision

Ireneinc recommendation:

Full ELZ transition to RLZ. Ireneinc found the area has rural living settlement attributes, is within proximity to existing RLZ, and landscape values manageable by scheme mechanisms with no further subdivision. Exception: 112 Tinderbox Road Blackmans Bay does not have rural living attributes and required further information.

TPC Day 2 hearing — panel comment:

No questions were raised at the hearing. Ireneinc noted the landscape values include a 'distinctive vegetative ridgeline landscape characterised by residential settlement pattern' — the settlement character is part of the landscape value. Dan Ford noted at [01:11:56] that there is 'certainly a more prevalence of residential feel in the Howden area' compared to east Tinderbox, supporting the RLZ outcome.

Key arguments available for submissions in this locality:

- Strongest RLZ comparison in the Channel Region — use as the primary comparable locality for any nearby LCZ-affected property
- Ireneinc recommended RLZ at medium risk, and this was not challenged — cite this as evidence that medium risk is not a bar to RLZ
- Ireneinc's finding that landscape values (including settlement character) are manageable by scheme codes without LCZ is directly relevant to neighbouring localities
- Delegate Ford's comment about 'residential feel' in Howden [01:11:56] is useful for any locality where residential settlement character is present but LCZ has been applied
- If your property in a neighbouring locality (Tinderbox east, Margate) has similar characteristics to Howden, consistency argument is strong

Most useful for templates:

T5 (accept RLZ, argue subcategory) if already recommended for RLZ. T1 (contest LCZ) with Howden cited as a comparison for neighbouring LCZ-affected properties.

12. Margate & Electrona

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	Mix: Rural Zone (Blue areas — rural activities); RLZ (residential cluster); LCZ (Van Morey Road elevated/vegetated); EMZ (environmental reserve)
TPC Day 2 outcome	Not challenged at hearing [01:29:00–01:34:00]
Lot sizes	Variable — Rural Zone parcels are larger; RLZ cluster has smaller lots; LCZ parcels vary
Landscape values	Significant on elevated/vegetated portions (Van Morey Road area); less significant on cleared rural parcels
Scenic Protection Area	Van Morey Road area — significant SPA coverage
Ireneinc risk rating	Medium-high for LCZ areas

Ireneinc recommendation:

Complex mixed outcome across sub-areas. Cleared, rural-activity parcels → Rural Zone (blue). Residential cluster parcels → RLZ (red). Van Morey Road elevated, vegetated, SPA-covered parcels → LCZ. Environmental reserve parcels → EMZ. The Rural Zone was applied where rural activities (grazing, farming) dominate and residential character is absent.

TPC Day 2 hearing — panel comment:

No questions were raised about Margate at the hearing. The outcome provides a clear example of how sub-area differentiation works in practice — the zone allocation follows the existing use character of each sub-area rather than treating the locality uniformly.

Key arguments available for submissions in this locality:

- For cleared/rural-activity parcels recommended for LCZ: argue that Ireneinc's own framework placed similar parcels into Rural Zone in this locality — if your lot has rural activities without residential character, Rural Zone is the precedented outcome (T2)
- For residential-cluster parcels: if your lot shares characteristics with the RLZ cluster but was placed in LCZ, argue consistency with the red RLZ group
- Van Morey Road / elevated LCZ parcels: hardest case — SPA coverage and elevation are specific factors cited; if these don't apply to your lot, argue differentiation
- EMZ land: if your lot adjoins EMZ, check whether the 'connection to EMZ' argument was used to justify LCZ — if so, argue the connection is not sufficient without site-specific values
- Many representations from Margate opposed LCZ — point to the breadth of community opposition as evidence of unreasonable impact

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for rural-activity parcels. T1 (contest LCZ, seek RLZ) for residential-cluster parcels. T4 (support Rural Zone) if already recommended.

13. Coningham & Snug

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	Mix: RLZ (Snug Tiers Road cluster); Rural Zone (Old Station Road / former PPZ footprint); LCZ (balance); 4 coastal parcels parked
TPC Day 2 outcome	Not challenged at hearing [01:56:00–02:03:30]
Lot sizes	Variable — Snug Tiers Road has smaller residential lots; Old Station Road has larger rural parcels
Landscape values	Significant across much of locality — coastal views, native vegetation, D'Entrecasteaux Channel setting
Scenic Protection Area	Check individual lot — significant SPA coverage likely
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

Mixed outcome. Snug Tiers Road residential cluster → RLZ. Old Station Road / former PPZ footprint → Rural Zone (existing rural activities). LCZ retained for balance of locality. Four coastal parcels were 'parked' (not decided) due to complexity of coastal interface issues.

TPC Day 2 hearing — panel comment:

No questions were raised about Coningham at the hearing. The Old Station Road Rural Zone outcome is notable — this was former PPZ land transitioned to Rural Zone rather than RLZ, recognising existing rural activities. Ireneinc's approach of differentiating residential clusters (→ RLZ) from rural activity areas (→ Rural Zone) within the same locality is instructive.

Key arguments available for submissions in this locality:

- Snug Tiers Road RLZ: strong precedent for residential cluster properties — if your lot is in or near this cluster, consistency argument applies

- Old Station Road / Rural Zone: if your lot has rural activity character and is in the rural parts of the locality, Rural Zone precedent applies (use T2)
- Four coastal parcels were 'parked': if your property was not decided, this is an opportunity to make a strong submission arguing your preferred outcome
- For LCZ-retained lots: check whether your lot has the coastal scenic values specifically cited — if it is set back from the coast without significant coastal views, argue differentiation
- Landscape values on coastal-facing lots are strongest — if your lot is not coastal-facing, argue the landscape value statement does not apply with full force to your title

Most useful for templates:

T1 (contest LCZ, seek RLZ) for residential-character lots near Snug Tiers Road. T2 (contest LCZ, seek Rural Zone) for rural-activity lots near Old Station Road. T5 if already recommended for RLZ.

14. Kettering East & Oyster Cove

✓ RECOMMENDED — RLZ	Region: Channel Region
Ireneinc recommendation	Full ELZ → RLZ (no further subdivision)
TPC Day 2 outcome	Not challenged — largest LCZ retreat of the day [02:04:40–02:12:25]
Lot sizes	Generally 1–10 ha; consistent residential settlement pattern along Manuka Road and surrounding roads
Landscape values	Present but found manageable by scheme codes without LCZ
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium

Ireneinc recommendation:

Full ELZ transition to RLZ across the entire locality — the largest single LCZ retreat in the Ireneinc report. Ireneinc found rural living settlement characteristics clearly present, lot sizes consistent with RLZ subcategories (no further subdivision), and landscape values manageable by scheme mechanisms. This was not challenged at the hearing.

TPC Day 2 hearing — panel comment:

The largest LCZ retreat of Day 2. No questions were raised about this recommendation at the hearing [02:04:40]. This locality is the single strongest precedent for RLZ in the Channel Region — cite it for any neighbouring LCZ-affected locality that shares similar characteristics.

Key arguments available for submissions in this locality:

- Primary comparable locality for the Channel Region — cite for any Channel area LCZ-affected property with similar characteristics with similar characteristics
- Full transition recommended at medium risk and not challenged — demonstrates medium risk is not a bar
- Lot sizes along Manuka Road (Kettering and Oyster Cove) accepted as consistent with RLZ — if your lot is similar, use this lot pattern as your settlement pattern evidence
- Ireneinc's finding that landscape values are manageable by codes here is applicable across the Channel Region
- Many submissions from this locality opposed LCZ (Reps 198.9, 198.11, 198.18, 198.19, 438, 536, 542, 543, 588, 589, 608 etc.) — point to the breadth of community opposition

Most useful for templates:

T5 (accept RLZ, argue subcategory) if recommended for RLZ. T1 (contest LCZ) with this locality as primary analogy for any nearby LCZ-affected property.

15. Kettering West

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	Mix: Rural Zone (western parcels — Watsons Road); RLZ (Groombridges Road & central area); LCZ (elevated yellow block — Saddle Road high point)
TPC Day 2 outcome	Ireneinc recommendation put to scrutiny; not ultimately challenged [02:20:00–02:40:00]
Lot sizes	Variable — Groombridges Road 1–5 ha; Watsons Road larger rural parcels; elevated block larger
Landscape values	Elevated yellow block has significant values; Groombridges Road values manageable by codes
Scenic Protection Area	Check individual lot — elevated block may have SPA; Groombridges Road check
Ireneinc risk rating	Groombridges: medium; elevated block: high

Ireneinc recommendation:

Complex mixed outcome. Groombridges Road residential cluster → RLZ. Western/Watsons Road parcels with rural activities → Rural Zone. Elevated Saddle Road block → LCZ (significant landscape values, high risk). At Day 2, the panel questioned Ireneinc closely and drew out the position that the Priority Vegetation Area overlay does the landscape-protection work on the Groombridges area — not the zone itself.

TPC Day 2 hearing — panel comment:

Key moment: at [02:33:54], the panel drew out the position that the Priority Vegetation Area overlay does the landscape-protection work, not the zone, in the Groombridges area. This is a strong statement that overlay controls can substitute for LCZ — cite this for any locality where PVA overlay applies. Many submissions from Groombridges Road opposed LCZ strongly.

Key arguments available for submissions in this locality:

- The [02:33:54] exchange in which the panel drew out that the PVA overlay does the landscape-protection work, not the zone, is the single most useful statement from Day 2 for any property with PVA coverage — cite this directly
- Groombridges Road RLZ: very strong basis for argument — over 30 submissions from this road opposed LCZ and Ireneinc recommended RLZ without challenge at the hearing
- Watsons Road Rural Zone: if your lot has rural activity character on the western side, Rural Zone precedent applies
- Elevated block LCZ: hardest case — site-specific evidence of significant elevation and scenic value required to challenge
- If your lot is NOT on the Saddle Road elevated block, argue that the 'elevated yellow block' reasoning does not apply to your parcel
- Fragmentation argument: Groombridges Road RLZ surrounded by LCZ was resolved in favour of RLZ — if your lot is in a similar fragmented LCZ pocket, cite this

Most useful for templates:

T1 (contest LCZ, seek RLZ) for Groombridges Road lots. T2 (contest LCZ, seek Rural Zone) for Watsons Road lots. T5 if already recommended for RLZ. Elevated block LCZ: T1 with very strong evidence required.

16. Woodbridge

~ RECOMMENDED — MIXED	Region: Channel Region
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Ireneinc recommendation	LCZ for bulk; yellow block (eastern cluster along Woodbridge Hill Road) → Rural Zone
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	LCZ bulk: larger lots; Woodbridge Hill Road cluster: smaller lots
Landscape values	Significant — D'Entrecasteaux Channel views, bushland
Scenic Protection Area	Significant coverage — check individual lot
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

LCZ retained for most of the locality. Eastern cluster along Woodbridge Hill Road (yellow block) transitioned to Rural Zone — these parcels were identified as having existing rural activities and limited landscape values compared to the balance. Fragmentation avoidance used to justify Rural Zone over isolated LCZ in the cluster.

TPC Day 2 hearing — panel comment:

No questions were raised about Woodbridge at the hearing. The Woodbridge Hill Road Rural Zone transition used both fragmentation avoidance and existing rural activities as justification — useful for any lots in the cluster that were not included in the Rural Zone recommendation.

Key arguments available for submissions in this locality:

- For Woodbridge Hill Road lots in LCZ: argue that the Ireneinc reasoning for the Rural Zone cluster applies equally to your lot — fragmentation, existing rural activities, consistency with the yellow block
- Many submissions from this road opposed LCZ (Reps 4, 55, 68, 341, 506 etc.) — reference community opposition and note many argued LCZ was an out of place on their road
- Rep 4 specifically argued nearly all properties along the road corridor were proposed for RLZ, making LCZ for their lot out of place — use this argument if it applies to your situation
- For LCZ bulk lots: SPA coverage is a key factor — if your lot has limited or no SPA coverage and is not prominently scenic, argue site-specific differentiation
- Channel views argument: if your lot does not have D'Entrecasteaux Channel views (set back, vegetated, blocked), argue the scenic value statement does not apply to your title

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for Woodbridge Hill Road lots. T4 (support Rural Zone) if already recommended. T1 (contest LCZ, seek RLZ) if residential character present and adjacency to RLZ exists.

17. Birchs Bay

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	LCZ for bulk; eastern yellow block → Rural Zone
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	Eastern cluster: smaller lots; LCZ bulk: larger/vegetated lots
Landscape values	Significant in LCZ bulk — bushland, coastal, scenic
Scenic Protection Area	Check individual lot — coastal lots likely covered
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

Pattern mirrors Woodbridge. LCZ retained for most of locality. Eastern cluster → Rural Zone on basis of fragmentation avoidance and existing rural activities. Ireneinc applied consistent approach across Birchs Bay, Woodbridge, Flowerpot, and Middleton.

TPC Day 2 hearing — panel comment:

No questions were raised about Birchs Bay at the hearing. The consistent approach across the southern Channel localities (Birchs Bay, Flowerpot, Middleton) means arguments from one locality apply equally to the others.

Key arguments available for submissions in this locality:

- Same arguments as Woodbridge — the Ireneinc approach is identical; cite Woodbridge Hill Road precedent for consistency
- For eastern Rural Zone cluster lots: if your lot was not included but shares similar characteristics, argue consistency and fragmentation avoidance
- Fragmentation: if your LCZ lot is isolated within the Rural Zone cluster area, cite fragmentation avoidance principle
- For LCZ bulk lots: same site-specific evidence needed as Woodbridge — check SPA coverage, scenic value, vegetation on your individual title
- Cross-locality consistency: if a neighbouring lot in an adjacent locality (Flowerpot, Woodbridge) with identical characteristics received Rural Zone, cite this directly

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for eastern cluster lots. T4 (support Rural Zone) if already recommended. T1 (seek RLZ) if residential character stronger than rural activity character.

18. Flowerpot

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	LCZ for bulk; split-zone Rural Zone for identifiable cluster
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	Cluster lots: smaller; LCZ bulk: larger/vegetated
Landscape values	Significant — ridgeline bushland corridor connecting Birchs Bay to Middleton
Scenic Protection Area	Check individual lot mapping
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

LCZ retained for most of locality. An identifiable cluster of properties transitioned to Rural Zone using split-zone approach, recognising existing rural activities and avoiding fragmented LCZ application. The broader LCZ retains a continuous bushland corridor connecting south to Gordon and north to Birchs Bay.

TPC Day 2 hearing — panel comment:

No questions were raised about Flowerpot at the hearing. The outcome is part of the consistent southern Channel approach. The split-zone methodology applied here (some lots in Rural Zone, surrounding lots in LCZ) is the model Ireneinc used across this group of localities.

Key arguments available for submissions in this locality:

- For cluster lots in LCZ: argue that the split-zone approach used for the Flowerpot cluster should apply to your lot — fragmentation avoidance and rural activity character are the key factors
- For LCZ bulk lots: the 'bushland corridor' connecting Birchs Bay to Gordon is the core landscape value cited — if your lot is not within this corridor (e.g. cleared, lower-lying, not part of the ridgeline), argue differentiation
- Ireneinc's concern about maintaining the continuous bushland corridor: if your lot does not contribute to this corridor, argue that LCZ is not necessary for your title specifically

- Cross-locality: same arguments apply as Birchs Bay and Middleton — use whichever neighbour received a more favourable outcome as your comparable locality

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for cluster lots. T4 (support Rural Zone) if already recommended.

19. Middleton

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	LCZ for bulk; eastern yellow block → Rural Zone (some split zoning)
TPC Day 2 outcome	Not challenged at hearing [Day 2 guide locality table]
Lot sizes	Eastern cluster: smaller/cleared; LCZ bulk: larger/vegetated
Landscape values	Significant — elevated bushland, ridgeline, D'Entrecasteaux Channel scenic values; Majors Hill prominent
Scenic Protection Area	Significant coverage across much of locality — check individual lot
Ireneinc risk rating	Medium-high

Ireneinc recommendation:

LCZ retained for most. Eastern yellow block → Rural Zone. Pattern consistent with Birchs Bay, Flowerpot, and Gordon. The specific landscape values cited for Middleton are: elevating bushland features retained around development, scenic values including large native vegetation hills behind settlement along ridgeline, and a consistent bushland corridor extending south to Gordon and north to Flowerpot.

TPC Day 2 hearing — panel comment:

No questions were raised about Middleton at the hearing. The Middleton bushland corridor landscape value statement is clearly set out in the Ireneinc report — if your lot does NOT display these values, the statement does not apply to your individual title.

Key arguments available for submissions in this locality:

- For eastern Rural Zone cluster lots: same arguments as Birchs Bay and Flowerpot — consistency and fragmentation
- For LCZ bulk lots: the landscape values cited are very specific (ridgeline bushland, hills behind settlement, bushland corridor) — if your lot is cleared, lower-lying, or not part of the ridgeline, these values do not characterise your title
- Majors Hill and ridgeline values: if your lot is not on or adjacent to the ridgeline, argue the landscape value statement does not apply with full force
- Scenic value: if your lot does not contribute to views from the Channel or from roads, argue scenic value is not relevant to your title
- Split zoning: Ireneinc accepted split-zone approach here — if your lot is large with both cleared and vegetated portions, argue for split-zone outcome (RLZ/Rural Zone for cleared portion, LCZ for vegetated portion) as an alternative to full LCZ

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for eastern cluster lots. T4 (support Rural Zone) if already recommended. T1 with strong site-specific evidence for LCZ bulk lots.

20. Gordon

~ RECOMMENDED — MIXED	Region: Channel Region
Ireneinc recommendation	LCZ for bulk; LDRZ (coastal strip); Rural Zone (western parcels); one mapping correction (crown land → EMZ, not LCZ)
TPC Day 2 outcome	Not challenged; one mapping correction noted and agreed at hearing [04:00:00–04:08:16]
Lot sizes	Western Rural Zone lots: larger rural parcels; LDRZ coastal strip: smaller; LCZ bulk: variable
Landscape values	Significant — D'Entrecasteaux Channel coastal setting, bushland, southern end of Channel corridor
Scenic Protection Area	Likely significant — coastal location; check individual lot
Ireneinc risk rating	Medium-high
Notable mapping correction	Crown land at Craigers Road (PID 7308390) was noted in report as LCZ but corrected on the day to EMZ — TPC and Ireneinc agreed at [04:07:57]

Ireneinc recommendation:

LCZ retained for most. Western rural parcels → Rural Zone (existing rural activities, connection to rural land to west). Coastal strip → LDRZ. One crown land parcel corrected from LCZ to EMZ during the hearing. The Gordon outcome is consistent with the broader southern Channel approach.

TPC Day 2 hearing — panel comment:

No questions were raised about Gordon at the hearing. The mapping correction at [04:07:57] is notable — it demonstrates the TPC will correct errors. If there are mapping errors affecting your property in Gordon or nearby, raise them explicitly in your submission.

Key arguments available for submissions in this locality:

- For western Rural Zone lots: if your lot has rural activity character and is on the western side, Rural Zone precedent applies — use T4 to support if already recommended
- For LCZ bulk lots: coastal landscape values are the key factor — if your lot does not have D'Entrecasteaux Channel coastal setting or is set back from the coast, argue differentiation
- Mapping correction precedent: if there is any error in the mapping for your property (wrong zone, wrong boundary), raise it explicitly — TPC will correct errors
- Crown land / EMZ boundary: if your lot adjoins EMZ or the corrected crown land, check whether the change affects the landscape value argument for your property
- LDRZ coastal strip: if your lot is on the coastal strip and currently in LCZ, argue that LDRZ (not LCZ) is the appropriate zone for coastal residential use

Most useful for templates:

T2 (contest LCZ, seek Rural Zone) for western rural lots. T4 (support Rural Zone) if already recommended. T1 for LCZ bulk lots with site-specific evidence. Raise any mapping errors explicitly.

CROSS-LOCALITY ARGUMENTS — APPLICABLE TO ALL 20 LOCALITIES

The following arguments apply regardless of locality and should be considered for inclusion in any submission template Part D or Part E.

1. The evaluation framework is not a statutory instrument [Day 2, 05:53:00]

Kate Heckelmann (Ireneinc) confirmed the framework is a tool, not a rule. The Commission must apply the Zone Guidelines (Guideline No. 1) and section 34 LUPAA, not the Ireneinc framework alone.

2. Risk ratings are judgement calls, not thresholds [Day 2 guide]

Low/medium/high risk ratings were accepted only as a rule of thumb. Challenge them with property-specific evidence — a medium or high risk rating does not decide the outcome.

3. Priority Vegetation Area overlay does the landscape-protection work [Day 2, 02:33:54]

At Kettering West, the panel drew out the position that the PVA overlay, not the zone, does the landscape-protection work. Where PVA overlay applies to your lot, LCZ is not necessary.

4. Visible rural activity is NOT required for RLZ [Day 2 guide]

This applied at Howden, Albion Heights, and Kingston West without challenge. A property does not need to show active farming or grazing to qualify for RLZ.

5. Council's 16 March resolution is not binding on the TPC [Day 2, 06:45:48]

Chair Heath explicitly set Council's 'least restrictive alternative' resolution aside. The Commission decides on section 34 LUPAA criteria.

6. Kettering East & Oyster Cove as primary comparable locality [Day 2, 02:04:40]

The largest LCZ retreat of the day — full ELZ → RLZ at medium risk. Cite for any Channel region property with similar lot size and residential settlement character.

7. Coordinate with neighbours [Day 2 — Chair Heath]

Chair Heath explicitly invited collective submissions organised by locality. A collective submission with multiple landowners plus individual parcel variations is viable and welcomed.

8. Fragmentation avoidance applies in all localities [Ireneinc Locality Reports]

Ireneinc explicitly applied fragmentation avoidance across all localities. Where your LCZ lot is isolated within a predominantly RLZ or Rural Zone area, cite this principle.

9. Council's 85% → 75% LCZ reduction history [Ireneinc LCZ Review]

The TPC itself found Council's initial LCZ application inconsistent with the Zone Guidelines. The progressive reduction shows the initial LCZ was not well-founded. This historical context applies to all localities.

10. Future rural living settlement review acknowledged [Transcript, 03:05:16]

Ireneinc acknowledged that a future rural living settlement review may reconsider current decisions, and that short-term risks are not definitive. This supports accepting a less restrictive zone now.

⚠ FINAL REMINDER: This guide reflects the position as at Day 2 of the TPC hearing (16 April 2026). All submissions must be lodged by midnight Monday 4 May 2026. Always verify the primary source documents — Ireneinc Locality Reports, Day 19 and Day 20 hearing recordings, and the Ireneinc LCZ Review — before finalising your submission. This guide does not constitute professional planning advice.

KINGBOROUGH LPS — IRENEINC ZONE REVIEW

Why Your Property Fits Rural Living Zone — 20 Locality Comparisons

⚠ **DEADLINE: All submissions must be lodged by midnight Monday 4 May 2026. This document supports your submission — it does not replace the submission templates or professional planning advice.**

PURPOSE: This document is structured into 20 sections — one for each mainland Kingborough locality. Each section contains a side-by-side comparison table showing how your locality was described and assessed by the consultant (Ireneinc) against a similar locality that was recommended for Rural Living Zone using the same types of descriptions and evidence. The goal is to help you show the Commission why your property should be in Rural Living Zone, by pointing to similar properties that were recommended for exactly that.

IMPORTANT NOTE ABOUT THE HEARING: The Day 19 and Day 20 hearings in April 2026 were for the Ireneinc report to be presented to the Tasmanian Planning Commission (TPC). During the hearing, TPC delegates asked questions about some recommendations. Where delegates did not ask questions about a particular area, this does not mean they agreed with the recommendation — in a long hearing covering 20 localities, time constraints meant many points were not questioned on the day. The recommendations in the Ireneinc report are not final decisions. The Commission will make its own decision based on all submissions and the statutory criteria in the Zone Guidelines. Your submission is your opportunity to put forward evidence about your specific property.

HOW TO USE THIS DOCUMENT: (1) Find the section for your locality. (2) Look at the comparison table — the left column shows how your locality was described; the right column shows how a similar locality was described when it was recommended for Rural Living Zone. (3) Note where the descriptions are the same or very similar. (4) Read the 'What this means for your submission' paragraph at the bottom of each section. (5) Use those points in Part D and Part E of your submission template, and attach the relevant locality section as Attachment A.

GLOSSARY — TERMS AND ABBREVIATIONS USED IN THIS DOCUMENT	
Term	What it means
LPS	Local Provisions Schedule
TPC	Tasmanian Planning Commission — the independent body that reviews and approves the LPS. They hold public hearings and make the final decision on zone allocations.
Ireneinc	The planning consultancy (Ireneinc Planning and Urban Design) engaged by Kingborough Council to review the zone recommendations. Their report was presented to the TPC at the April 2026 hearings.
ELZ	Environmental Living Zone — the zone that most of the affected properties are in under the current (interim) planning scheme. This zone is being phased out and must be replaced with a new zone under the LPS.
LCZ	Landscape Conservation Zone. A zone that prioritises protecting landscape values such as native bushland, scenic views, and native vegetation.
RLZ	Rural Living Zone. Allows residential use (a home and associated rural activities like hobby farming) on larger lots in a rural setting. It has four categories — A, B, C and D — based on minimum lot size. This is the zone most similar to how properties in the Environmental Living Zone have been used.
RZ	Rural Zone. A zone for rural land where agricultural use is limited. It allows a range of rural activities but treats residential use as discretionary. It is less restrictive than LCZ but does not give residential use the same priority as Rural Living Zone.
EMZ	Environmental Management Zone.
SPA	Scenic Protection Area. A mapped overlay that applies to land with important scenic values — usually elevated or visually prominent land. Where this overlay applies, extra rules control building height and design to protect scenic views. Ireneinc used the presence or absence of this overlay as one reason for recommending LCZ or Rural Living Zone in some localities.
PVA	Priority Vegetation Area. A mapped overlay that identifies land containing important native vegetation — for example, threatened plant species or significant habitats. The Natural Assets Code (see below) applies to land within this overlay and limits how much vegetation can be cleared.
NAC	Natural Assets Code. A state-wide planning code that controls clearing of native vegetation within Priority Vegetation Areas and protects waterways and coastal areas. It applies regardless of what zone the land is in.
DP6 (Decision Point 6)	Step 6 in the assessment process (decision tree) that Ireneinc used to evaluate each locality. This step asks: 'Could the landscape values be protected if Rural Living Zone was applied, using the NAC, SPA, and other existing planning rules?' A 'yes' answer at this step supports Rural Living Zone. A 'no' answer supports LCZ.
UGB	Urban Growth Boundary. A boundary that separates urban areas (where growth is planned) from rural areas. Land inside the UGB is expected to develop at higher densities over time. The state planning strategy does not support Landscape Conservation Zone inside the Urban Growth Boundary.
STRLUS	Southern Tasmania Regional Land Use Strategy — the state government's planning strategy for the Southern region. It sets out policies for where growth should and should not occur. Zone recommendations in the LPS must be consistent with this strategy.
KIPS / Interim Planning Scheme	Kingborough Interim Planning Scheme 2015 — the current planning rules that apply until the new LPS comes into effect. Most affected properties are currently zoned Environmental Living (ELZ) under the KIPS.
LUPAA	Land Use Planning and Approvals Act 1993 — the Tasmanian law that governs planning schemes and the role of the TPC. Section 34 of this Act sets out the legal tests the TPC must apply when deciding whether the LPS is correct.
Zone Guidelines / Guideline No. 1	A document issued by the TPC that sets out the rules for which zone should be applied to which type of land. It is the main reference document for zone decisions in the LPS process. It includes specific rules for LCZ (rules LCZ 1–4) and Rural Living Zone (rules RLZ 1–4) that must be followed.
Risk rating (low / medium / high)	A judgement made by Ireneinc at Decision Point 6 about how likely it is that landscape values would be harmed if Rural Living Zone was applied instead of LCZ. TPC delegates confirmed at the hearing that these ratings are judgement calls — they are not defined legal thresholds. A medium or high risk rating does not automatically mean LCZ is required.

REGION 1 — KINGBOROUGH BUSHLAND SURROUNDS

1. Kingston & Kingston Beach [Kingston & Bushland Surrounds]

Ireneinc outcome: LCZ retained. Ireneinc recommendation at Day 20: but explicitly flagged as out of place — LCZ inside the Urban Growth Boundary is inconsistent with STRLUS [04:17:00–04:25:00].

Characteristic	Kingston & Kingston Beach — Outcome: LCZ retained	Albion Heights & Bonnet Hill — Outcome: Full RLZ
Ireneinc landscape value description	Residential on large bushland lots (1–6 ha); surrounded by urban residential; inside Urban Growth Boundary; Boronia Hill parkland connection	Elevated bushland; vegetated ridgeline landscape; dwellings nestled into vegetation; scenic backdrop to Channel; similar native vegetation character
Settlement characteristics found	Yes — consistent residential pattern on larger lots; recognisable subdivision pattern	Yes — rural living settlement; lots 2–25 ha; dispersed but recognisable settlement pattern between higher-intensity residential
Lot sizes	1–6 ha	2–25 ha (majority 2–5 ha)
SPA coverage	Partial	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high	Medium
DP6 — codes manage landscape values?	Not explicitly tested — LCZ retained on exhibited position	YES — 'sufficient mechanisms in the planning scheme to provide for appropriate management of landscape values'
Key differentiator cited	Located inside UGB; LCZ accepted as out of place for this process only	Located between higher-intensity residential uses; codes sufficient; min lot size prevents subdivision
Zone Guidelines basis	LCZ flagged as STRLUS-inconsistent by TPC — no positive Zone Guidelines basis explained	RLZ 1(a), 2(b); RLZ min lot size provides no further subdivision

Zone outcome for Kingston & Kingston Beach	Landscape Conservation Zone	⚠ INCONSISTENCY: The Landscape Conservation Zone was recommended despite the TPC explicitly acknowledging it is STRLUS-inconsistent. Albion Heights, with similar or more significant landscape values, was recommended for full Rural Living Zone. The UGB location is the only distinguishing factor cited — but this is a planning strategy consideration, not a Zone Guidelines criterion for LCZ.
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What this means for your submission: The TPC's own acknowledgement that LCZ inside the UGB is a STRLUS an inconsistency undermines the LCZ justification. If your lot does not contribute to the Boronia Hill bushland corridor and has cleared or developed character, argue that LCZ 1 threshold is not met on your individual title, drawing on the Albion Heights precedent where comparable vegetation and residential character produced RLZ.

2. Albion Heights & Bonnet Hill [Kingston & Bushland Surrounds]

Ireneinc outcome: Full ELZ → RLZ. Presented at the hearing [04:29:00–04:38:00]. Bonnet Hill LDRZ pocket outside UGB contested separately.

Characteristic	Albion Heights & Bonnet Hill — Outcome: Full RLZ	Kingston West (upper blocks) — Outcome: LCZ retained
Ireneinc landscape value description	Elevated bushland; distinctive ridgeline landscape; vegetated; dwellings on expansive parcels; scenic backdrop	Elevated bushland on upper blocks; similar ridgeline character; dwellings within vegetated setting — near-identical language to Albion Heights
Settlement characteristics found	Yes — semi-rural residential character; lots 2–25 ha; dwellings on expansive parcels	Yes — western residential cluster; upper blocks have larger lots with residences
Lot sizes	2–25 ha (majority 2–5 ha)	Variable; upper blocks >5 ha; western cluster 1–5 ha
SPA coverage	Partial	Partial (similar extent)
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium — Ireneinc recommended Rural Living Zone	Medium — used to justify LCZ for upper blocks
DP6 — codes manage landscape values?	YES — codes and min lot size manage values adequately	Partially — Ireneinc found increased building height from RLZ could become more visually prominent on upper blocks
Key differentiator cited	Located between higher-intensity residential zones; codes sufficient	Elevation and visual prominence of upper blocks — but same features are present in Albion Heights
Zone Guidelines basis	RLZ 1(a), 2(b) applied	LCZ 1 applied to upper blocks — but no more significant landscape value than Albion Heights
Zone outcome for Albion Heights & Bonnet Hill	Full RLZ — consistent	⚠ INCONSISTENCY: Ireneinc recommended full Rural Living Zone for this locality — it is an similar locality for LCZ-retained properties in Kingston West with similar elevation and vegetation character. The same medium risk rating that produced RLZ here was used to retain LCZ in the upper Kingston West blocks, despite near-identical landscape value descriptions.

Submission argument (for Kingston West properties referencing Albion Heights): Ireneinc's own finding here — that landscape values at this elevation are manageable by scheme codes and a min lot size that prevents subdivision — applies equally to upper Kingston West blocks. Cite the identical risk rating and near-identical landscape value language as evidence of inconsistency.

3. Taroona & Kingston North [Kingston & Bushland Surrounds]

Ireneinc outcome: LCZ retained for majority; small group of western parcels noted as potentially suitable for Rural Zone. Ireneinc recommendation at Day 20: at medium-to-high risk.

Characteristic	Taroona & Kingston North — Outcome: LCZ retained	Howden & Blackmans Bay — Outcome: Full RLZ
Ireneinc landscape value description	Elevated bushland; ridgeline character; scenic values; coastal interface on eastern parcels; connection to Hobart City Council boundary	Native bushland; towering Eucalyptus; distinctive vegetated ridgeline; residential settlement pattern follows topography; dwellings screened by vegetation; scenic views
Settlement characteristics found	Yes — residential uses occurring; interface with urban areas; western parcels have rural farming activities	Yes — rural living settlement; lots 1–5 ha; located between urban settlements at Blackmans Bay and Howden
Lot sizes	Variable — mix of larger and smaller lots near Channel Highway	1–5 ha (majority); two larger parcels ~10–16 ha
SPA coverage	Significant	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-to-high	Medium
DP6 — codes manage landscape values?	Not clearly concluded — Ireneinc noted alignment with Hobart City Council LCZ across boundary as additional factor	YES — codes and min lot size manage values; 'low risk where RLZ is applied'
Key differentiator cited	Alignment with Hobart City Council LCZ across municipal boundary; eastern parcels have significant values	Residential settlement pattern predominates; codes sufficient; existing blocks already fully used
Zone Guidelines basis	LCZ 1/2(c) — but cross-boundary alignment is not a Zone Guidelines criterion	RLZ 1(a), 2(b)

Zone outcome for Taroona & Kingston North	LCZ retained	⚠ INCONSISTENCY: Ireneinc used alignment with Hobart City Council's LCZ across the municipal boundary as a supporting reason for LCZ here. This is not a criterion under the Zone Guidelines (Guideline No. 1). Howden & Blackmans Bay, with similar or less significant landscape values and partial SPA coverage, was recommended for full Rural Living Zone at medium risk. Ireneinc also acknowledged that western rural-use parcels in Taroona could be Rural Zone — suggesting the LCZ boundary was drawn more broadly than the evidence supports.
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What this means for your submission: Cross-boundary consistency with Hobart's LCZ is not a basis for LCZ under Zone Guidelines LCZ 1 or 2. The Zone Guidelines require site-specific landscape value justification. Cite Howden as similar — similar elevation, vegetation, and coastal setting produced RLZ at the same partial SPA coverage. For western rural-use parcels, Ireneinc's own concession that Rural Zone may be appropriate supports a T2 submission.

4. Kingston West [Kingston & Bushland Surrounds]

Ireneinc outcome: Mixed — LCZ for elevated upper blocks; RLZ for western residential cluster; extra western parcels added to RLZ. Ireneinc recommendation at Day 20: with case-by-case flexibility; Chair Heath noted small cleared residential lots inside LCZ can still be argued out [05:50:30].

Characteristic	Kingston West (LCZ upper blocks) — LCZ retained	Albion Heights & Bonnet Hill — Full RLZ	Howden & Blackmans Bay — Full RLZ
Ireneinc landscape value description	Elevated bushland; ridgeline; scenic backdrop — near-identical language to Albion Heights and Howden	Elevated bushland; vegetated ridgeline; dwellings nestled in vegetation; scenic backdrop	Vegetated ridgeline; residential settlement follows topography; native bushland; scenic views to/from properties
Settlement characteristics found	Yes — upper blocks have residential uses but less consistent pattern than western cluster	Yes — semi-rural residential; lots 2–25 ha; between higher-intensity zones	Yes — lots 1–5 ha; consistent pattern; between Blackmans Bay and Howden urban areas
Lot sizes	Upper blocks >5 ha; western cluster 1–5 ha	2–25 ha	1–5 ha
SPA coverage	Partial	Partial	Partial
PVA / NAC overlay	Yes	Yes	Yes
Risk rating applied	Medium (upper = LCZ)	Medium (→ RLZ)	Medium (→ RLZ)
DP6 — codes manage landscape values?	Ireneinc said codes were not enough — cited elevation and building height risk	YES — codes and min lot size adequate	YES — codes and min lot size adequate; 'low risk'
Key differentiator cited	Elevation/prominence of upper blocks; building height difference between RLZ and LCZ	Located between higher-intensity residential zones	Settlement pattern clear; existing blocks already fully used

Zone outcome for Kingston West (upper LCZ blocks)	LCZ retained	⚠ INCONSISTENCY: The same medium risk rating and near-identical landscape value descriptions produced RLZ in Albion Heights and Howden but LCZ in Kingston West upper blocks. The sole cited difference is the height allowance differential between RLZ and LCZ on elevated blocks — but Albion Heights and Howden are equally elevated and was recommended for Rural Living Zone. Delegate Ford directly challenged this distinction at Day 2 [01:07:00–01:08:25], noting the landscape descriptions are 'very similar' and asking what the actual difference is between localities where codes can and cannot manage.
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What this means for your submission: Chair Heath at [05:50:30] explicitly noted that small cleared residential lots inside Kingston West LCZ can be argued out through representations. Cite Albion Heights and Howden as directly similar — identical risk rating, identical or greater elevation, nearly identical landscape value language — yet full RLZ resulted. The building height differential alone is not a sufficient basis for LCZ where codes, NAC, and PVA overlay provide equivalent protection.

5. Neika [Kingston & Bushland Surrounds]

Ireneinc outcome: LCZ for majority; 2 Huon Road parcels → RLZ; split-zone approach for 540 Leslie Road (cleared portion → RLZ). Ireneinc recommendation at Day 20: with case-by-case flexibility.

Characteristic	Neika (LCZ majority) — Outcome: LCZ retained	Neika (Huon Road parcels) — Outcome: RLZ
Ireneinc landscape value description	Significant bushland and elevated landscape across most of locality; scenic values; similar vegetation character throughout	Same locality — landscape values present throughout; no meaningful difference in landscape character between LCZ and RLZ areas identified
Settlement characteristics found	Present across much of locality — residential uses with varying lot sizes	Yes — Huon Road lots show rural living pattern consistent with adjoining RLZ to south
Lot sizes	Variable — many >10 ha in LCZ portion	Similar to LCZ portions but positioned adjacent to existing RLZ
SPA coverage	Partial across locality	Partial — same as LCZ area
PVA / NAC overlay	Yes throughout	Yes — same as LCZ area
Risk rating applied	Medium-high (LCZ)	Lower — consistency with adjoining RLZ cited
DP6 — codes manage landscape values?	Ireneinc did not apply this reasoning to the LCZ majority	YES — characteristics consistent with existing RLZ to south; 'could be reasonably managed in the same way'
Key differentiator cited	Lot sizes >10 ha (too large for RLZ without subdivision risk) for some parcels; insufficient consistency in settlement pattern	Proximity and consistency with adjoining RLZ parcels — same reasoning, same landscape values

Zone outcome for Neika (LCZ majority)	LCZ retained	⚠ INCONSISTENCY: Ireneinc applied RLZ to specific Huon Road parcels because of consistency with adjoining RLZ — using the same landscape value and code management reasoning it declined to apply to the LCZ majority. The proximity to adjoining RLZ argument applies equally to other Neika lots that adjoin or are near existing RLZ. For large lots (>10 ha), Ireneinc's concern about subdivision potential is addressed by applying RLZ D (minimum 10 ha) — a solution Ireneinc accepted at 540 Leslie Road.
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What this means for your submission: If your Neika property adjoins or is in close proximity to existing RLZ or to the Huon Road RLZ parcels, argue consistency — the same reasoning Ireneinc applied to grant RLZ on Huon Road applies to your lot. For large lots, show that RLZ D (minimum 10 ha) eliminates subdivision potential, directly addressing the risk Ireneinc cited for LCZ retention.

6. Leslie Vale [Kingston & Bushland Surrounds]

Ireneinc outcome: Exhibited RLZ + LCZ mix retained as appropriate; no recommended changes. Ireneinc recommendation at Day 20:. Note: 540 Leslie Road split-zone (RLZ for cleared portion, LCZ for vegetated balance) was flagged but accepted.

Characteristic	Leslie Vale (LCZ portions) — Outcome: LCZ retained	Leslie Vale (RLZ portions) — Outcome: RLZ retained
Ireneinc landscape value description	Native vegetation; scenic values; 540 Leslie Road specifically: >20 ha, extensive vegetation connecting to EMZ to northeast	Similar native vegetation and scenic character — landscape descriptions are consistent across the locality; no meaningful difference in vegetation type identified
Settlement characteristics found	Present across LCZ portions — residential uses occurring	Yes — clear residential and rural living settlement pattern in RLZ portions
Lot sizes	LCZ lots range from smaller to very large (540 Leslie Road >20 ha)	Generally smaller to medium lots in RLZ portions
SPA coverage	Partial across locality	Partial — similar coverage
PVA / NAC overlay	Yes	Yes
Risk rating applied	Not re-assessed — exhibited position retained	Not re-assessed — exhibited position retained
DP6 — codes manage landscape values?	Not re-evaluated — existing LCZ carried forward without new analysis	Existing RLZ carried forward as appropriate — codes managing values
Key differentiator cited	540 Leslie Road: lot size >20 ha; extensive vegetation; EMZ connection. Other LCZ lots: no specific new differentiator identified	Existing RLZ already established; settlement pattern consistent with rural living

Zone outcome for Leslie Vale (LCZ portions)	LCZ retained	⚠ INCONSISTENCY: Ireneinc did not re-evaluate the Leslie Vale LCZ or RLZ designations — it simply accepted the exhibited position. Where a LCZ lot does NOT share the characteristics of 540 Leslie Road (lot size >20 ha, extensive native vegetation, EMZ connection), the specific LCZ justification for that lot is absent from the Ireneinc report. Lots that share characteristics with the existing RLZ portions have no documented basis for different treatment.
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What this means for your submission: If your Leslie Vale LCZ lot is smaller than 20 ha and does not share the specific characteristics of 540 Leslie Road (extensive vegetation, EMZ connection), the LCZ justification in the Ireneinc report does not apply to your title. Argue that your lot's characteristics match the existing RLZ properties in the locality, and that Ireneinc's failure to re-evaluate the LCZ designation means the exhibited LCZ was not positively confirmed by the review process.

7. Allens Rivulet [Kingston & Bushland Surrounds]

Ireneinc outcome: Mixed — RLZ (Mountain Road / Allens Rivulet Road parcels); Rural Zone (red group with rural activities); LCZ balance. Ireneinc recommendation at Day 20:.

Characteristic	Allens Rivulet (LCZ balance) — Outcome: LCZ retained	Allens Rivulet (RLZ parcels — Mountain Rd) — Outcome: RLZ
Ireneinc landscape value description	Bushland; native vegetation; similar landscape character throughout locality — no meaningful difference in landscape value description between LCZ and RLZ parcels in the locality report	Same locality — landscape values present throughout; the RLZ recommendation was based on settlement pattern consistency, not absence of landscape values
Settlement characteristics found	Present — residential uses in LCZ portions	Yes — Mountain Road / Allens Rivulet Road parcels show rural living settlement characteristics consistent with adjoining RLZ
Lot sizes	Variable in LCZ portions	Similar — consistent with adjoining RLZ lot sizes
SPA coverage	Partial throughout locality	Partial — same as LCZ areas
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium for LCZ	Lower — consistency with adjoining RLZ
DP6 — codes manage landscape values?	Not explicitly concluded as YES for LCZ balance	YES — 'could be reasonably managed in the same way' as adjoining RLZ
Key differentiator cited for RLZ	—	Consistency with and proximity to adjoining RLZ parcels — characteristics match

Zone outcome for Allens Rivulet (LCZ balance)	LCZ retained	⚠ INCONSISTENCY: Ireneinc granted RLZ to specific parcels on consistency with adjoining RLZ — using the same landscape and code management reasoning it declined to apply to the LCZ balance. If a LCZ lot is adjacent to or near the Mountain Road / Allens Rivulet Road RLZ cluster and shares similar characteristics, the consistency argument applies equally. The Ireneinc report does not identify any meaningful difference in landscape values between the RLZ and LCZ sub-areas of this locality.
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What this means for your submission: If your Allens Rivulet LCZ lot is adjacent to or shares characteristics with the Mountain Road / Allens Rivulet Road RLZ parcels, argue consistency — the same basis Ireneinc used to grant RLZ to those parcels applies to yours. For rural-activity-dominant lots, cite the Rural Zone group as similar and use T2 template.

8. Sandfly & Kaoota [Kingston & Bushland Surrounds]

Ireneinc outcome: Mixed — RLZ (Pregnall's Road / Talbots Road residential cluster); Rural Zone (Halls Track / Pioneer / Huon / Thompson Roads); LCZ balance. Ireneinc recommendation at Day 20:.

Characteristic	Sandfly & Kaoota (LCZ balance) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Elevated bushland; scenic values; mix of cleared and vegetated parcels; similar to Channel Region descriptions. Pregnall's / Talbots cluster: 'elevated bushland interspersed with cleared areas; rural activities contribute to overall landscape values'	Rural living characteristics; scenic landscape; interface between coastline and bushland; dwellings integrated into natural setting — near-identical language to Sandfly cluster areas
Settlement characteristics found	Yes — Pregnall's / Talbots cluster: clear rural living settlement pattern. LCZ balance: less consistent pattern in some areas	Yes — consistent rural living settlement throughout; lots 1–10 ha along Manuka Road; pattern clear and recognisable
Lot sizes	Pregnall's / Talbots: 2–8 ha. LCZ balance: variable, some larger	1–10 ha (majority 2–7 ha)
SPA coverage	Partial	Partial — comparable extent
PVA / NAC overlay	Yes throughout	Yes
Risk rating applied	Low-medium for RLZ cluster; medium-high for LCZ balance	Medium — accepted for full locality
DP6 — codes manage landscape values?	YES for RLZ cluster: PVA and SPA manage values; 'low to medium risk'	YES — codes and min lot size manage values; full RLZ accepted
Key differentiator cited	LCZ balance: more fragmented settlement; some larger lots outside cluster pattern	Clear settlement pattern throughout; existing blocks already fully used; codes adequate
Zone outcome for Sandfly & Kaoota (LCZ balance)	LCZ retained	⚠ INCONSISTENCY: Kettering East was recommended for full Rural Living Zone at medium risk with landscape value descriptions and settlement patterns nearly identical to the Sandfly/Kaoota Pregnall's cluster — and with comparable characteristics to many LCZ-balance lots. Ireneinc's own Sandfly assessment found codes manage landscape values in the RLZ cluster; the same conclusion was not applied to the LCZ balance without clear additional justification.

What this means for your submission: If your Sandfly / Kaoota LCZ lot shares characteristics with the Pregnall's / Talbots RLZ cluster (lot 2–8 ha, residential settlement character), cite the cluster RLZ as directly similar. For the broader LCZ balance, cite Kettering East where nearly identical characteristics — including medium risk — produced full RLZ across the entire locality.

9. Longley & Lower Longley [Kingston & Bushland Surrounds]

Ireneinc outcome: Exhibited zoning generally retained; part of 137 Anderson Road → Rural Zone; Krauses Road and Huon/Andersons Roads → Rural Zone (TPC modifications). Ireneinc recommendation at Day 20:.

Characteristic	Longley & Lower Longley (LCZ) — Outcome: LCZ retained	Longley & Lower Longley (Rural Zone parcels) — Outcome: Rural Zone
Ireneinc landscape value description	Elevated landscape; bushland; hinterland character across the locality — consistent descriptions throughout; no meaningful difference in landscape value language between LCZ and Rural Zone areas in the locality	Same locality — Rural Zone parcels at Krauses Road, Huon Road, and Andersons Road have similar landscape setting; the Rural Zone recommendation was based on existing rural activities, not absence of landscape values
Settlement characteristics found	Present — residential and rural uses throughout	Yes — existing rural farming and grazing activities on specific parcels
Lot sizes	Variable in LCZ portions	Larger rural parcels at Krauses Road, Andersons Road
SPA coverage	Partial	Partial — similar extent
PVA / NAC overlay	Yes	Yes
Risk rating applied	Not explicitly re-assessed — exhibited LCZ retained	Not rated separately — Rural Zone applied on existing-use basis
DP6 — codes manage landscape values?	Not explicitly re-evaluated for LCZ balance	Implicitly YES — Rural Zone applied because existing rural activities dominate; codes manage any residual landscape values
Key differentiator cited	Exhibited LCZ accepted without re-evaluation	Existing rural activities (grazing, farming) on specific parcels; consistent with Rural Zone purpose

Zone outcome for Longley & Lower Longley (LCZ)	LCZ retained	⚠ INCONSISTENCY: Ireneinc did not re-evaluate the LCZ designation for the balance of Longley and Lower Longley — it simply accepted the exhibited position. Rural Zone was applied to specific parcels with existing rural activities. Where a LCZ lot also has existing rural activities, the same Rural Zone reasoning applies. Where a LCZ lot has residential character similar to the existing RLZ land in the municipality, the Sandfly and Kettering East precedents support an RLZ argument.
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What this means for your submission: For Longley LCZ lots with existing rural activities, cite the Anderson Road / Krauses Road Rural Zone precedent and use T2 template. For residential-character lots, the Ireneinc report did not positively confirm the LCZ through re-evaluation — argue this gap, and cite Sandfly Pregnall's cluster or Kettering East as similar localities where comparable characteristics produced RLZ.

REGION 2 — CHANNEL REGION

10. Tinderbox [Channel Region]

Ireneinc outcome: West side → full RLZ. East side → LCZ retained. TPC Day 20: East — 'locality where TPC delegates asked the most questions about the LCZ justification' [00:35:10–00:47:04]. Delegate Probert at [01:06:52–01:08:25] directly stated the landscape descriptions are near-identical and the only difference is the risk profile — which Ireneinc was then challenged to explain.

Characteristic	Tinderbox East — LCZ retained	Tinderbox West — Full RLZ	Howden & Blackmans Bay — Full RLZ
Ireneinc landscape value description	'Elevated bushland... vegetated ridgeline... dwellings nestled into vegetation... scenic backdrop... residential settlement pattern closely follows natural topography' — IDENTICAL language to west side	Identical landscape value language — same peninsula, same vegetation type, same topographic character, same coastal setting	'Distinctive vegetated ridgeline landscape characterised by residential settlement pattern... native bushland present throughout... dwellings often screened by retained vegetation' — same language, different locality
Settlement characteristics found	Yes — residential settlement along Tinderbox Road; lots 1–10 ha; dwellings with outbuildings; recognisable pattern	Identical — same road, same peninsula, same settlement type	Yes — lots 1–5 ha; consistent pattern; framed by reserves to north and south
Lot sizes	1–10 ha (with 2 large northeastern lots noted as outliers)	1–10 ha	1–5 ha (majority)
SPA coverage	NO — absent on eastern coast	YES — Scenic Protection Area covers western peninsula	Partial — not full SPA coverage
PVA / NAC overlay	Yes	Yes	Yes
Risk rating applied	Medium-high → LCZ	Low-medium → RLZ	Medium → RLZ
DP6 — codes manage landscape values?	NO — 'potential for increased height associated with extensions or new builds to become more visible'; SPA absent means no code control on height	YES — SPA provides height control; 'low risk where RLZ is applied'	YES — 'codes and min lot size manage values; low risk'; SPA only partially present — same as east Tinderbox in areas
Key differentiator cited	Absent SPA on east coast; higher building height allowance in RLZ vs LCZ; two large northeastern lots reduce settlement consistency	SPA present; western development less visually prominent from water	Residential settlement character predominates; codes sufficient
TPC challenge	Delegate Ford [00:35:14]: 'Specifically, what cannot be managed through those codes?' Delegate Probert [01:07:48]: 'One we say they can be managed and the other one we say they can't — what we really need to say is the difference between those two'	Recommended by Ireneinc without challenge	Recommended by Ireneinc without challenge

Zone outcome for Tinderbox East	LCZ retained	⚠ INCONSISTENCY: This is the starkest inconsistency in the entire Ireneinc report. Delegate Probert's own words from the hearing [01:07:48] confirm it: identical landscape value descriptions, identical settlement characteristics, and both sides of the same peninsula — but opposite zone outcomes. The sole cited differentiator is the absence of SPA on the eastern coast. However Howden & Blackmans Bay, which has PARTIAL SPA coverage (not full), also was recommended for Rural Living Zone at medium risk. The SPA-absence argument is not applied consistently.
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Submission argument — Tinderbox East properties: Cite Delegate Probert's own statement from [01:07:48] verbatim — 'one we say they can be managed and the other one we say they can't be managed... what we really need to say is the difference between those two.' Then show that Howden was recommended for Rural Living Zone at partial SPA coverage, and Kettering West Groombridges was recommended for Rural Living Zone after TPC delegates identified an issue and the concession that PVA overlay does the landscape-protection work [02:33:54]. If PVA applies to your east Tinderbox lot, argue the SPA-absence rationale is overcome by PVA coverage.

11. Howden & Blackmans Bay [Channel Region]

Ireneinc outcome: Full ELZ → RLZ. Ireneinc recommendation at Day 20: without challenge [00:59:00–01:03:00]. This is the primary RLZ precedent for the Channel Region.

Characteristic	Howden & Blackmans Bay — Outcome: Full Rural Living Zone — best comparison for your area	Tinderbox East — Outcome: LCZ retained
Ireneinc landscape value description	'Native bushland, towering Eucalyptus trees; distinctive vegetated ridgeline landscape characterised by residential settlement pattern; dwellings often screened by retained vegetation; elevated topography provides scenic views'	Near-identical language: elevated bushland; vegetated ridgeline; dwellings nested in vegetation; scenic backdrop — Delegate Probert confirmed descriptions are 'very similar' [01:07:21]
Settlement characteristics found	Yes — lots 1–5 ha; consistent pattern; located between Blackmans Bay and Howden settlements	Yes — residential settlement along Tinderbox Road; lots 1–10 ha; same peninsula structure
Lot sizes	1–5 ha (majority); 2 parcels ~10–16 ha	1–10 ha; 2 large northeastern lots noted
SPA coverage	Partial — not full coverage	NO SPA on east coast
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium — Ireneinc recommended Rural Living Zone	Medium-high — used to justify LCZ
DP6 — codes manage landscape values?	YES — 'sufficient mechanisms in the planning scheme... low risk where RLZ is applied'	NO — 'increased height could become more visibly prominent; SPA absent'
Key differentiator	None explained — landscape descriptions are near-identical; Howden simply described as having 'more prevalence of residential feel' [Transcript 01:11:56]	Two large northeastern lots reduce settlement consistency; SPA absent
TPC challenge	Recommended by Ireneinc without challenge	Delegate Ford: 'Specifically what cannot be managed through those codes?' — direct challenge to the LCZ justification
Zone outcome for Howden & Blackmans Bay	Full RLZ — consistent	⚠ INCONSISTENCY: This locality is the most useful comparison for the Channel Region. Its consistent use as an similar comparison in submissions is supported by Delegate Ford's Day 20 challenge to the Tinderbox East LCZ justification and Delegate Probert's explicit statement that the landscape descriptions are near-identical. Howden was recommended for Rural Living Zone with partial SPA coverage — the same coverage level cited as insufficient in Tinderbox East.

Submission argument (for any Channel region LCZ locality): Cite Howden as the primary similar locality. The landscape value language, settlement characteristics, lot sizes, partial SPA coverage, and risk profile are comparable to many LCZ-retained localities in the Channel Region. Use Ireneinc's own Howden reasoning — 'sufficient mechanisms in the planning scheme to provide for appropriate management' — and argue it applies equally to your property.

12. Margate & Electrona [Channel Region]

Ireneinc outcome: Mixed — Rural Zone (cleared rural parcels); RLZ (residential cluster); LCZ (Van Morey Road elevated/SPA-covered); EMZ (reserve). Ireneinc recommendation at Day 20: [01:29:00–01:34:00].

Characteristic	Margate & Electrona (LCZ — Van Morey Road) — Outcome: LCZ retained	Margate & Electrona (RLZ cluster) — Outcome: RLZ
Ireneinc landscape value description	Van Morey Road: 'significant natural landscape values and scenic landscape values'; elevated; SPA-covered; prominent views from Channel	RLZ cluster: 'landscape values consistent with that anticipated in a rural living settlement; contributing to overall scenic character' — landscape values PRESENT but found manageable
Settlement characteristics found	Limited — Van Morey Road has fewer residential lots; not a clear rural living settlement pattern	Yes — recognisable rural residential subdivision pattern; lots 2–7 ha; residential uses and rural activities
Lot sizes	Larger lots on Van Morey Road; less consistent pattern	2–7 ha — consistent with RLZ C
SPA coverage	YES — significant SPA coverage on Van Morey Road elevated area	Partial — same general area
PVA / NAC overlay	Yes	Yes
Risk rating applied	High (Van Morey elevated block)	Low-medium
DP6 — codes manage landscape values?	NO — SPA coverage does not negate the elevated prominence and visual significance at this specific location	YES — codes and min lot size manage values; consistent with adjoining RLZ land
Key differentiator cited	Elevation, SPA coverage, visual prominence from Channel; no clear rural living settlement pattern	Settlement pattern consistent with rural living; existing blocks already fully used
Zone outcome for Margate & Electrona (Van Morey LCZ)	LCZ retained	⚠ INCONSISTENCY: The Van Morey Road LCZ is the most defensible LCZ retention in Margate — it has strong SPA coverage, high elevation, and high visual prominence from the Channel. However, properties in the Margate LCZ area that do NOT share these specific characteristics (elevated, SPA-covered, Channel-prominent) have no documented basis for LCZ over RLZ. Many Margate properties with similar characteristics to the RLZ cluster were LCZ in the exhibited scheme and remain LCZ in Ireneinc — argue site-specific differentiation from the Van Morey characteristics.

What this means for your submission: If your Margate property is not on the elevated Van Morey Road ridge and does not have the specific Channel-prominence cited for LCZ, argue differentiation. The RLZ cluster in the same locality was recommended for Rural Living Zone because codes manage landscape values and the settlement pattern is consistent with rural living. If your lot shares those characteristics, cite the within-locality RLZ as the directly relevant precedent.

13. Coningham & Snug [Channel Region]

Ireneinc outcome: Mixed — RLZ (Snug Tiers Road cluster); Rural Zone (Old Station Road / PPZ footprint); LCZ balance; 4 coastal parcels not decided. Ireneinc recommendation at Day 20: [01:56:00–02:03:30].

Characteristic	Coningham & Snug (LCZ balance) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Coastal views; native vegetation; D'Entrecasteaux Channel setting; coastal bushland — near-identical language to Kettering East. 'Landscape values consistent with a rural living settlement within the region, contributing to overall scenic character and coastal rural landscapes'	'Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting; interface between coastline and bushland contributing to significant landscape value'
Settlement characteristics found	LCZ balance: less consistent settlement than Snug Tiers Road cluster; variable lot sizes	Yes — consistent rural living settlement throughout; lots 1–10 ha along Manuka Road
Lot sizes	Variable in LCZ balance; some larger lots	1–10 ha
SPA coverage	Significant for some coastal LCZ lots	Partial — comparable or lesser coverage
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high for LCZ balance	Medium — Ireneinc recommended full Rural Living Zone
DP6 — codes manage landscape values?	NOT explicitly concluded as YES for LCZ balance	YES — full locality; codes and min lot size manage values
Key differentiator cited	More variable settlement pattern in LCZ areas; coastal interface complexity; 4 parcels parked	Clear consistent settlement pattern; existing blocks already fully used throughout
Zone outcome for Coningham & Snug (LCZ balance)	LCZ retained	⚠ INCONSISTENCY: Kettering East was recommended for full Rural Living Zone at medium risk with a D'Entrecasteaux Channel coastal setting described in near-identical terms to the Coningham/Snug LCZ balance. The coastal setting alone did not prevent RLZ at Kettering East. The key differentiator used here — less consistent settlement pattern — is a matter of degree, not kind, and is challengeable with evidence that individual lots in the LCZ balance do have consistent settlement characteristics.

What this means for your submission: If your Coningham / Snug LCZ lot has a consistent rural living settlement character (lot 1–10 ha, dwelling with outbuildings, rural activities), cite Kettering East as the primary similar locality — identical coastal setting, comparable landscape values, medium risk. Cite Snug Tiers Road as within-locality evidence that the same area can support RLZ where settlement pattern is recognised.

14. Kettering East & Oyster Cove [Channel Region]

Ireneinc outcome: Full ELZ → RLZ — largest LCZ retreat of Day 2. Ireneinc recommendation at Day 20: immediately [02:04:40–02:12:25]. This is the primary RLZ precedent for the southern Channel Region.

Characteristic	Kettering East & Oyster Cove — Outcome: Full Rural Living Zone — best comparison for southern Channel	Woodbridge (LCZ bulk) — Outcome: LCZ retained
Ireneinc landscape value description	'Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting; interface between coastline and bushland contributing to significant landscape value'	D'Entrecasteaux Channel views; bushland; scenic values — near-identical coastal and bushland language to Kettering East
Settlement characteristics found	Yes — clear rural living settlement; lots 1–10 ha along Manuka Road; consistent pattern throughout	Woodbridge Hill Road cluster: recognisable rural pattern. LCZ bulk: less consistent settlement
Lot sizes	1–10 ha (majority)	LCZ bulk: variable, some larger. Woodbridge Hill Rd: smaller
SPA coverage	Partial — not full coverage	Significant — greater SPA coverage than Kettering East in some areas
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium — full RLZ accepted	Medium-high — LCZ retained for bulk
DP6 — codes manage landscape values?	YES — full locality; codes and min lot size manage values; existing blocks already fully used	NOT fully concluded — channel views and bushland cited as requiring LCZ protection
Key differentiator cited	Clear consistent settlement pattern; existing blocks already fully used	Woodbridge Hill Rd cluster: fragmentation/rural activities → Rural Zone. LCZ bulk: channel views and continuous bushland
Zone outcome for Kettering East & Oyster Cove	Full RLZ — consistent	⚠ INCONSISTENCY: This locality is the most useful comparison for the southern Channel Region. Its full acceptance at medium risk, with a D'Entrecasteaux Channel coastal setting described in near-identical terms to LCZ-retained Woodbridge, Birchs Bay, Middleton, and Gordon, shows that coastal setting and bushland alone do not prevent RLZ. The distinguishing characteristic consistently cited for LCZ in the southern localities is the continuous bushland corridor along the ridgeline — which does not characterise every individual lot within those localities.

Submission argument (for all southern Channel LCZ localities): Cite Kettering East directly. Identical D'Entrecasteaux Channel coastal setting, identical landscape value language, partial SPA coverage — but full RLZ at medium risk. Argue that the continuous bushland corridor argument does not apply to individual cleared, developed, or lower-elevation lots that do not contribute to the ridgeline corridor. Use Kettering East's DP6 finding ('codes and min lot size manage values') and apply it to your property.

15. Kettering West [Channel Region]

Ireneinc outcome: Mixed — Rural Zone (Watsons Road); RLZ (Groombridges Road / central area); LCZ (elevated Saddle Road yellow block). Ireneinc recommendation at Day 20: after TPC acknowledgement that PVA overlay does landscape-protection work, not the zone [02:33:54].

Characteristic	Kettering West (Groombridges Rd) — RLZ — TPC corrected	Kettering East — Full RLZ	Tinderbox East — LCZ retained
Ireneinc landscape value description	Elevated bushland; similar Channel coastal setting to Kettering East; rural living characteristics present in Groombridges cluster	Identical coastal/bushland description — same Channel, same landscape character, same vegetation type	Near-identical elevated bushland and ridgeline description — see Tinderbox section for full quote
Settlement characteristics found	Yes — Groombridges cluster has clear rural living pattern consistent with Kettering East	Yes — clear rural living settlement throughout	Yes — residential settlement along Tinderbox Road; similar pattern
Lot sizes	1–7 ha (Groombridges cluster)	1–10 ha	1–10 ha
SPA coverage	Partial (elevated block only)	Partial	NO — absent on east coast
PVA / NAC overlay	Yes — PVA applies to Groombridges area	Yes	Yes
Risk rating applied	Medium (initially LCZ proposed; TPC corrected)	Medium (full RLZ)	Medium-high (LCZ)
DP6 — codes manage landscape values?	YES — TPC [02:33:54]: 'Priority Vegetation overlay does the landscape-protection work, not the zone' — PVA accepted as sufficient	YES — codes and min lot size; full RLZ	NO — SPA absent; RLZ height allowance creates risk
Key finding / TPC intervention	TPC delegates identified a problem and the consultant agreed to a change — PVA overlay is sufficient; zone does not need to be LCZ to protect landscape values	Recommended by Ireneinc without challenge	TPC challenged but accepted; flagged as weakest LCZ retention

Zone outcome for Kettering West	Mixed — inconsistency now partially corrected by TPC	⚠ INCONSISTENCY: The TPC's forced correction at [02:33:54] — that the PVA overlay does the landscape-protection work, not the zone — is the most important single statement from Day 20 for LCZ-affected landowners. This principle was NOT applied to Tinderbox East (where PVA is also present), despite near-identical characteristics. The inconsistency in applying the PVA-sufficiency principle selectively remains uncorrected.
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What this means for your submission: If PVA applies to your property, cite the TPC's statement at [02:33:54] directly — 'the Priority Vegetation overlay does the landscape-protection work, not the zone.' Show that PVA applies to your lot and argue that this is equivalent to the protection the TPC found sufficient at Groombridges. This argument applies to any LCZ locality where PVA coverage exists — Tinderbox East, Kingston West, Taroona, and others.

16. Woodbridge [Channel Region]

Ireneinc outcome: LCZ for bulk; eastern yellow block (Woodbridge Hill Road) → Rural Zone. Ireneinc recommendation at Day 20: Multiple representations from Woodbridge Hill Road argued LCZ was an an inconsistency for their road.

Characteristic	Woodbridge (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	D'Entrecasteaux Channel views; bushland; scenic values; continuous ridgeline bushland corridor extending to Birchs Bay and south to Gordon	Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting — near-identical Channel coastal landscape language
Settlement characteristics found	Woodbridge Hill Road cluster: recognisable rural pattern. LCZ bulk: variable lot sizes, less consistent residential pattern in some areas	Yes — consistent rural living settlement throughout locality; lots 1–10 ha
Lot sizes	LCZ bulk: variable, some larger. Woodbridge Hill Rd: smaller	1–10 ha (majority)
SPA coverage	Significant — greater than Kettering East in some areas	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — continuous bushland corridor cited as requiring LCZ protection	YES — codes and min lot size; existing blocks already fully used
Key differentiator cited	Continuous ridgeline bushland corridor (Birchs Bay to Woodbridge to Gordon); LCZ needed to maintain corridor	Clear residential settlement; blocks already fully used; existing codes protect landscape values
Within-locality precedent	Woodbridge Hill Road → Rural Zone: fragmentation avoidance + existing rural activities	—

Zone outcome for Woodbridge (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Kettering East, with a near-identical D'Entrecasteaux Channel coastal and bushland setting, was recommended for full Rural Living Zone at medium risk. Woodbridge LCZ bulk was recommended for Landscape Conservation Zone at medium-high risk citing the 'continuous bushland corridor' — but not every individual lot within the LCZ bulk contributes to this corridor, particularly cleared, lower-elevation, or developed lots. Rep 4 from Woodbridge Hill Road specifically argued their LCZ was an an inconsistency because 'nearly all properties along the road corridor were proposed to be rezoned to Rural Living Zone.'
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What this means for your submission: For Woodbridge LCZ lots that do not contribute to the ridgeline bushland corridor (cleared, developed, lower-elevation, set back from the ridgeline), argue that the corridor justification does not apply to your individual title. Cite Kettering East as the similar coastal-bushland locality that was recommended for full Rural Living Zone. For Woodbridge Hill Road lots, cite Rep 4’s argument directly alongside the Ireneinc Rural Zone cluster as evidence that the corridor argument does not apply to the road-frontage properties.

17. Birchs Bay [Channel Region]

Ireneinc outcome: LCZ for bulk; eastern yellow block → Rural Zone. Ireneinc recommendation at Day 20:. Pattern mirrors Woodbridge.

Characteristic	Birchs Bay (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Coastal bushland; scenic; D'Entrecasteaux Channel setting; eastern cluster has cleared/rural character. Ireneinc approach identical to Woodbridge — 'areas of elevating bushland features retained around existing development contributing to landscape value and overall scenic values'	Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting — same Channel coastal language
Settlement characteristics found	Eastern cluster: rural activities. LCZ bulk: variable lot sizes	Yes — consistent rural living settlement throughout; lots 1–10 ha
Lot sizes	Eastern cluster: smaller/cleared. LCZ bulk: larger/vegetated	1–10 ha
SPA coverage	Likely significant for coastal lots	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — same bushland corridor argument as Woodbridge	YES — codes and min lot size; full RLZ
Key differentiator cited	Continuous ridgeline bushland corridor (Flowerpot to Gordon)	Consistent settlement pattern; existing blocks already fully used; codes manage values

Zone outcome for Birchs Bay (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Same inconsistency as Woodbridge — D'Entrecasteaux Channel coastal and bushland setting nearly identical to Kettering East, but different zone outcome. Same argument applies: cleared, developed, or lower-elevation lots that do not contribute to the ridgeline corridor are not characterised by the landscape values cited for LCZ retention.
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What this means for your submission: Same as Woodbridge — cite Kettering East as the primary similar locality. For individual lots that are cleared, developed, or not on the ridgeline, argue the corridor justification does not apply to your title. Note that the Ireneinc approach to Birchs Bay and Woodbridge is identical — a submission that succeeds for Woodbridge is directly relevant to Birchs Bay.

18. Flowerpot [Channel Region]

Ireneinc outcome: LCZ for bulk; identifiable cluster → Rural Zone (split-zone approach). Ireneinc recommendation at Day 20:. Pattern consistent with Birchs Bay and Middleton.

Characteristic	Flowerpot (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	Ridgeline bushland corridor connecting Birchs Bay to Gordon; 'elevating bushland features retained around existing development contributing to landscape value and scenic values including large areas of native vegetation hills'	Scenic landscape; coastal interface; bushland — same Channel region language. Landscape values present but manageable
Settlement characteristics found	Cluster: identifiable rural pattern with existing rural activities. LCZ bulk: larger vegetated lots	Yes — consistent rural living settlement throughout
Lot sizes	Cluster: smaller/cleared. LCZ bulk: larger/vegetated	1–10 ha
SPA coverage	Partial	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ bulk	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — corridor continuity cited	YES — codes and min lot size; full RLZ
Key differentiator cited	Ridgeline bushland corridor must be maintained (Birchs Bay to Gordon)	Consistent settlement pattern; existing blocks already fully used; codes manage values

Zone outcome for Flowerpot (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Same corridor argument as Birchs Bay and Woodbridge. Same Kettering East inconsistency. Additionally: Ireneinc accepted the split-zone approach for the cluster (Rural Zone for cleared/active parcels) — demonstrating that the corridor argument does not apply to every parcel within the locality boundary.
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What this means for your submission: The split-zone precedent within this locality shows that Ireneinc itself accepted that not every lot within Flowerpot contributes to the bushland corridor. For individual lots that are cleared, have existing rural activities, or are not part of the ridgeline vegetation, argue the corridor justification does not apply. Cite Kettering East and the within-locality Rural Zone cluster as dual precedents.

19. Middleton [Channel Region]

Ireneinc outcome: LCZ for bulk; eastern yellow block → Rural Zone (some split zoning). Ireneinc recommendation at Day 20:. Pattern consistent with Birchs Bay, Flowerpot, Gordon.

Characteristic	Middleton (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	'Elevating bushland features retained around existing development; large areas of native vegetation hills behind settlement along ridgeline; consistent bushland corridor extending south to Gordon and north to Flowerpot; Majors Hill prominent scenic feature'	'Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting' — same Channel coastal language; no Majors Hill equivalent cited
Settlement characteristics found	Eastern cluster: cleared; rural activities. LCZ bulk: larger vegetated lots on ridgeline	Yes — consistent rural living settlement throughout; lots 1–10 ha
Lot sizes	Eastern cluster: smaller/cleared. LCZ bulk: larger/vegetated ridgeline	1–10 ha
SPA coverage	Significant — Majors Hill and ridgeline area	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ bulk	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — Majors Hill and ridgeline corridor cited as requiring LCZ	YES — codes and min lot size; full RLZ
Key differentiator cited	Majors Hill prominent scenic feature; ridgeline native vegetation hills; continuous corridor to Gordon and north to Flowerpot	Consistent settlement pattern; existing blocks already fully used; codes manage values

Zone outcome for Middleton (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: Middleton has the most specifically explained landscape value in the southern Channel group — Majors Hill and the vegetated ridgeline hills are named features. However, not every lot within the LCZ bulk is ON the Majors Hill ridgeline or contributes to the elevated bushland corridor. Cleared, lower-elevation, or settled lots in the LCZ area that sit below or away from the ridgeline are not characterised by those specific landscape values.
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What this means for your submission: The Majors Hill and ridgeline landscape value does not apply to every lot in the LCZ bulk. If your Middleton lot is below the ridgeline, cleared, at lower elevation, or does not contribute to views of or from Majors Hill, show this site-specific differentiation. Cite the eastern cluster Rural Zone as within-locality evidence that cleared lots are appropriately zoned Rural Zone or RLZ, not LCZ. Cite Kettering East for the broader coastal bushland inconsistency.

20. Gordon [Channel Region]

Ireneinc outcome: LCZ bulk; LDRZ coastal strip; Rural Zone (western parcels with rural activities). Ireneinc recommendation at Day 20:, with one mapping correction — crown land at Craigers Road corrected from LCZ to EMZ [04:07:57].

Characteristic	Gordon (LCZ bulk) — Outcome: LCZ retained	Kettering East & Oyster Cove — Outcome: Full RLZ
Ireneinc landscape value description	D'Entrecasteaux Channel coastal setting; bushland; southern end of ridgeline corridor (extending north through Middleton, Flowerpot, Birchs Bay, Woodbridge to Kettering)	Scenic landscape; coastal interface; bushland; dwellings integrated into natural setting — same Channel coastal language used throughout the Channel Region
Settlement characteristics found	Western parcels: rural activities (grazing, farming). LDRZ strip: small coastal residential. LCZ bulk: variable lot sizes	Yes — consistent rural living settlement throughout; lots 1–10 ha along Manuka Road
Lot sizes	Western Rural Zone: larger rural. LDRZ: small. LCZ bulk: variable	1–10 ha
SPA coverage	Likely significant coastal coverage	Partial
PVA / NAC overlay	Yes	Yes
Risk rating applied	Medium-high — LCZ	Medium — full RLZ
DP6 — codes manage landscape values?	Ireneinc did not reach this conclusion for the LCZ bulk — southern anchor of the bushland corridor cited	YES — codes and min lot size; full RLZ
Key differentiator cited	Southern anchor of the D'Entrecasteaux Channel bushland corridor; connection between channel coastal landscape and terrestrial bushland	Consistent settlement pattern; existing blocks already fully used; codes manage values
Mapping correction	Crown land at Craigers Road corrected from LCZ to EMZ at Day 2 [04:07:57] — Ireneinc confirmed the correction	—

Zone outcome for Gordon (LCZ bulk)	LCZ retained	⚠ INCONSISTENCY: The Gordon LCZ bulk is the southern anchor of the channel corridor argument used consistently from Woodbridge south. The same Kettering East inconsistency applies — coastal setting, bushland, scenic values, but different zone outcome. The mapping correction at Day 20 also shows the TPC will correct errors, including zone boundary errors, if raised.
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What this means for your submission: If your Gordon LCZ lot is not on the elevated coastal bushland interface (cleared, western-side rural, or developed), argue differentiation from the corridor value. The western Rural Zone was accepted because existing rural activities dominate — if your lot has rural character, use T2 and cite the Rural Zone precedent. For LDRZ coastal strip lots incorrectly remaining in LCZ, argue that LDRZ is the appropriate zone based on the coastal strip designation. Raise any mapping errors explicitly — the TPC corrected one on the day.

ATTACHMENT A

Inconsistency Analysis — Ireneinc Zone Evaluation

PART 1 — SUBMISSION IDENTIFICATION

Submission reference	Siri Anne Bjorhusdal [REDACTED] 203 Direction 69
Property title reference	[REDACTED]
Locality	Margate
Submission template used	Template 1- contest LCZ, seek RLZ
Date of attachment preparation	2/5-26

PART 2 — PURPOSE OF THIS ATTACHMENT

This attachment has been prepared to support the written submission identified above. It provides comparative analysis of the Ireneinc zone evaluation framework as applied to the landowner's locality, compared against one or more similar localities that received a different — and more favourable — zone outcome using the same or very similar evidence.

The purpose is to demonstrate to the Commission that the Ireneinc recommendation for this locality is inconsistent with the outcome produced by the same evaluation framework applied elsewhere in the municipality, and that there is no clear reason to treat this locality differently from the similar localities identified.

This attachment should be read alongside the written submission, in particular the arguments set out in Part D (D7 — Inconsistency in the Ireneinc evaluation framework) and Part E (Locality-Specific Context) of that submission.

PART 3 — HEARING EVIDENCE SUPPORTING THIS ANALYSIS

The following statements from the Day 19 and Day 20 TPC hearings directly support the use of a comparative inconsistency analysis as evidence in a submission:

Speaker and timestamp	Statement and relevance
Delegate Rohan Probert [01:07:48]	Comparing Tinderbox East (LCZ) with Howden (RLZ): 'They are very similar if you only look at the description of the landscape values... one we say they can be managed and the other one we say they can't be managed. What we really need to say is the difference between those two.' This statement acknowledges that the Ireneinc framework produced inconsistent outcomes from very similar evidence, and that the difference between localities needs to be clearly explained. This analysis does exactly that for this locality.
Delegate Dan Ford [02:33:54]	At Kettering West: effectively forced the concession that the Priority Vegetation Area (PVA) overlay does the landscape-protection work, not the zone. This is directly relevant where PVA applies to the subject property and LCZ has been

	recommended — the same logic that produced RLZ at Kettering West Groombridges applies.
Kate Heckelmann (Ireneinc) [05:53:00]	Conceded that the evaluation framework is a tool, not a legal requirement. Submissions can move away from it if supported by good evidence. This confirms that identifying inconsistencies in the framework's application — as this analysis does — is a legitimate basis for a submission.
Chair Nick Heath [06:45:48]	Confirmed that the Commission will decide on the basis of section 34 LUPAA criteria (Zone Guidelines and LPS criteria), not on the basis of Council's position or the Ireneinc framework alone. The Zone Guidelines require consistent application of zone criteria — inconsistency of the kind documented in this attachment is therefore directly relevant to the Commission's assessment under the law.

PART 4 — MOST RELEVANT COMPARISONS FOR THIS SUBMISSION

The following table identifies the specific comparisons within the attached Inconsistency Analysis that are most directly relevant to this submission. The full comparative tables for this locality appear in the pages that follow.

Characteristic compared	Similar locality cited in Attachment A	Why this comparison supports my submission
Landscape values and residential settlement pattern	Albion Heights and Bonnet Hill	Both areas are described as elevated bushland with vegetated ridgelines, dispersed dwellings, and similar rural-residential lot sizes. Albion Heights received Rural Living Zone despite these characteristics, demonstrating that landscape values of this type can be appropriately managed under RLZ. My locality shares these same characteristics, yet has been recommended for LCZ, with no clear or consistent basis for the different outcome.
Risk rating and ability of planning controls to manage landscape values	Kingston West (compared with Albion Heights)	Why this comparison supports my submission. The Ireneinc assessment applied similar 'medium' risk rating to both areas, yet reached different zoning outcomes. In Albion Heights, RLZ was applied on the basis that planning controls and minimum lot sizes adequately manage landscape values. The same reason should apply to my property, where existing planning controls already regulate vegetation and development.
Lot size and established rural-residential use	Kettering East and Oyster Cove	Why this comparison supports my submission: Kettering East was recommended for full Rural Living Zone with lot sizes and residential settlement patterns comparable to

Settlement pattern and ability of planning controls to manage landscape values	Margate and Electrona	my locality. This demonstrates that land of similar scale and character is considered appropriate for RLZ. My property is already used for residential purposes and aligns with this established rural living pattern, making LCZ an inconsistent outcome. Within the Margate and Electrona locality, areas with an established rural-residential settlement pattern were recommended for Rral Living Zone on the basis that planning controls (including overlays and minimum lot sizes) are sufficient to manage landscape values. My property exhibits the same characteristics including established residential use and consistent settlement pattern yet has been included in LCZ. This represents an inconsistent application of the same assessment criteria within the same locality.
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PART 5 — PROPERTY-SPECIFIC DIFFERENTIATION

This attachment identifies inconsistencies at the locality level.

The submission itself provides the property-specific evidence explaining why those inconsistencies apply to this individual property.

In summary, the following characteristics of this property are consistent with the similar localities that received RLZ, and are not consistent with the reasons cited by Ireneinc for LCZ retention:

The property contains an established dwelling, shed, greenhouse, three large fruit trees, berries and vegetable gardens, dog enclosure, woodshed and all in a large cleared open area, and is used for ongoing residential purposes, consistent with rural living settlement patterns identified in comparable RLZ localities.

The existing Crown Road access is consistent with rural-residential use and the RLZ but not with the LCZ.

The property is subjected to Private Timber Reserve, which create a conflict with the intent of the Landscape Conservation Zone and demonstrates that LCZ is not an appropriate or coherent zoning outcome.

The locality surrounding the property was historically logged approximately 40 years ago and is now characterised by regrowth vegetation rather than undisturbed native forest. This reduces the relative landscape sensitivity compared to areas of intact vegetation and supports the suitability of RLZ.

PART 6 — VERIFICATION AND PRIMARY SOURCES

All comparisons in this attachment can be verified against the following primary source documents, which are publicly available:

- Ireneinc Locality Baseline and Alternative Zone Evaluation (available on the TPC website)
- Ireneinc LCZ Review and Findings Report (available on the TPC website)
- TPC Day 20 hearing recording — Kingborough Council YouTube channel (available until midnight 19 June 2026)
- Section 8A Guideline No. 1 — LPS Zone and Code Application (available on the TPC website)

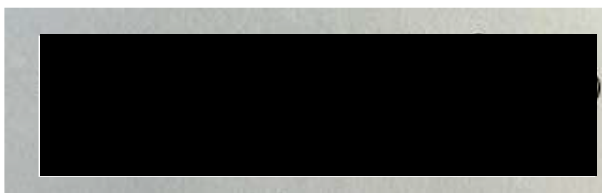
The timestamps in this attachment (e.g. [01:07:48]) show how far into the Day 20 YouTube recording each exchange takes place. To verify a quoted exchange, navigate to that timestamp in the recording. The full text transcript is also available as a supporting document to this submission.

PART 7 — DECLARATION

I confirm that:

1. This attachment has been prepared to support a formal written submission to the Tasmanian Planning Commission in relation to the Kingborough Local Provisions Schedule (Direction 69).
2. The comparisons contained in this attachment are based on publicly available Ireneinc reports and TPC hearing records, and I have made reasonable efforts to ensure accuracy.
3. I am the owner or authorized representative of the property identified in Part 1 above.

Signed:



Full name: Siri Anne Bjorhusdal

Date:

2/5-26

Contact email / phone:

[Redacted contact information]

