
From: David Taylor [REDACTED]
Sent: Friday, 1 May 2026 8:30 AM
To: Kingborough LPS
Subject: TPC Submission
Attachments: TPC Hearing Representation_DTaylorSubmission.pdf

Sent from my iPhone
David Taylor [REDACTED]

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April 14, 2026

TPC Hearing Representation

Opposition to the proposed Landscape Conversation Zone/Rural

Request for Rural Living Zone B for [REDACTED] [REDACTED]

Good morning,

I would like to take the opportunity to thank the commission for the ability to document my concerns on the proposed zoning changes for Kingborough council. Your letter dated on April 2, 2026, states that I had not previously participated in the assessment process. I want it to be noted that I have not been contacted by Kingborough council in regards to the assessment process prior to November 5, 2025.

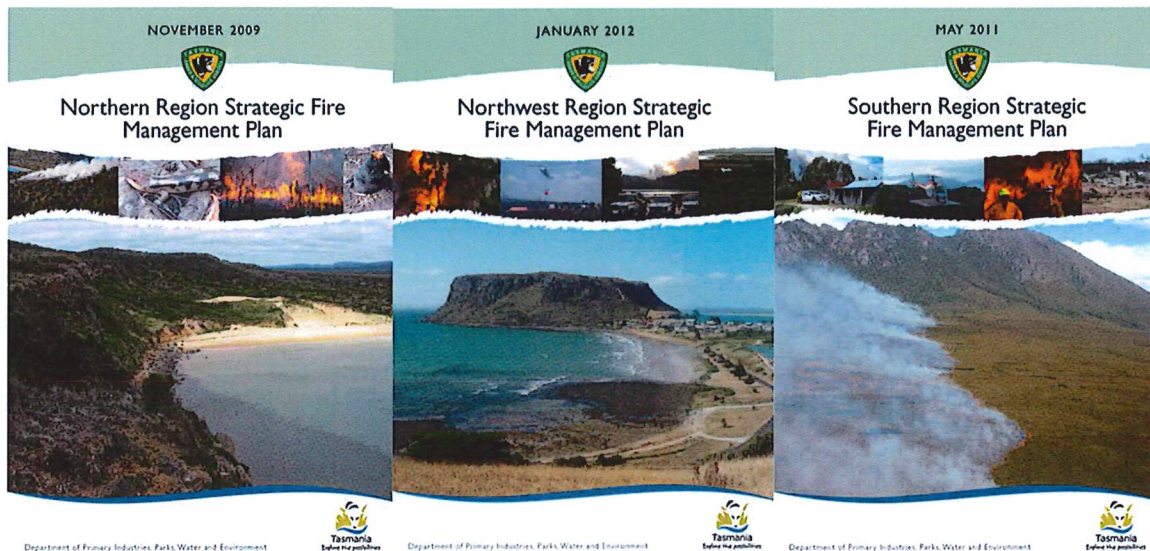
Name	David Taylor
Date	April 20, 2026
Property Address	[REDACTED] PID [REDACTED]
Requested Zone	Rural Living Zone

I both personally and professionally oppose the recommended changes for my property [REDACTED] Snug) from ELZ to split zone of RZ and LCZ. I strongly believe that the site is better aligned to Rural Living Zone B which is conducive to the historic, current and future planned land activity for the area.

I would like to present a quickly an overview of my background in regard to planning and natural resource management to help support my creditability.

I have been employed for 40 plus years in natural resource management. In Canada from 1981-2006 I was working in Alberta in a variety of geographic regions as a Forest Management Officer managing and protecting the natural resources for the provincial government. In the later years I specialised in Bushfire Management. I worked with refining the provincial Wildfire Threat Assessment model and produced the first provincial Community Protection Plan for Alberta for which I received an award for.

In Tasmania I was employed as the Strategic Fire Planning Officer for Parks and Wildlife Service (PWS) from 2007-2022. During that time, I produced the 3 Regional Strategic Fire Management Plans for PWS tenure (52% of land tenure of Tasmania). Before undertaking the tasked I researched and developed the Bushfire Risk Assessment Model (BRAM) which was used to help define the difference between perceived and actual bushfire risk. These plans are still being used being by PWS today.

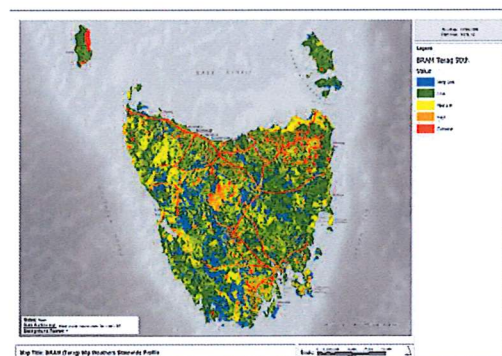


BRAM was developed using the format identified in the ISO 31000 risk matrix, this has been transitioned to Tasmanian Emergency Risk Assessment Guidelines (TERAG). It is a framework that utilise a variety of inputs to analyse and evaluate elements of risk, impacts and consequences towards values. This process was developed to assist with the protection of the identified biodiversity values for the state of Tasmania.

Bushfire Prone



TERAG Bushfire Risk Level



I also possess a national and international accreditation as a Level 1 Planning Officer and Fire Behaviour Analysist in Incident Command System (ICS) in both Australia and Canada.

SYNOPSIS OF THE PROPOSED PLANNING/ZONE PROCESS

Planning process, application to a zoning methodology and decisions made should be based on rigorous scientific research and evidence-based observations. The use of personal opinions or bias does not have a place in this process; transparency and clear measurable objectives are essential to this process.

In reviewing the Irene Inc. report, it was noted that many ambiguous terms were used. The use of terms such as “significant, well vegetated and large” when defining “Landscape Values” was never defined in the document. This leads to individual interpretation when applying the methodology to define areas of interest.

Also, in the Irene Inc Report it was also noted that in “4.1.1 Pre-lodgement of LPS- Paragraph 6 Guidelines Number 1 used by the minister under Section 8A of LUPPA – LCZ was **not** to replace ELZ”. It also has been identified in “Direction 69” that “there is an opportunity for the planning authority to consider the application of the Rural Living Zone more broadly to this areas currently zoned Environmental Living Zone”. Guideline 1 in the Kingborough Local Provisions Schedule (LPS) LCZ4 states that the “Landscape Conservation Zone should not be applied to (a) land where the priority is for residential use and development” AND the “Landscape Conservation Zone is not a replacement zone for Environmental Zone in the interim planning schemes”.

Considering the outcome of the present zoning process this direction was clearly not followed by Kingborough council regarding the Snug/Conningham area.

EVIDENCE OF STRATEGIC INTENT FOR LIVING

Both the original LPS and IreneInc’s reports lack clear definitions of “primary strategic intent.” They ignore existing rural-residential settlements, historical land use, cultural attachment, community ties, and intergenerational living. Neither STRLUS nor the Kingborough Strategic Plan restrict rural living growth. Past land allocations, subdivision approvals, and development applications show that residential use is the ‘strategic intent’ of the land.

The review for my locality Snug/Conningham is stated as generally meeting strategic intent for living. My property has an established dwelling, outbuildings, and signs of residential activity, confirming my intent to live there.

EVIDENCE OF RURAL LIVING SETTLEMENT

IreneInc’s review states that the Snug Tiers community meets the ‘strategic intent for living’ because there is ‘evidence of residential uses scattered throughout’. However, Rural Living Settlement status has been mostly denied, with the report citing a ‘lack of

consistent subdivision pattern with lots of the size which would contribute to a rural living settlement’.

This assessment appears biased, primarily due to two judgments. First, it favours smaller lot sizes, disregarding the RLZ subcategories that limit subdivision of lots under 20ha and restrict larger lots by access and services (note: there is NO maximum lot size in RLZ). Second, the ‘consistent pattern’ is only recognised if it resembles urban cul-de-sacs or road clusters, ignoring rural and lifestyle properties that are naturally sited around topographical features, inherited large lots, or purchased with future rural living in mind.

These biases overlook the fact that residents live just minutes from Snug township, where they shop, support local businesses, send children to school, recreate, and work. The reliance on a desktop analysis, which can’t see below tree canopies and often lacks on-the-ground insight, leads to subjective judgments about rural settlements. For example, the Irenelnc report notes that three nearby properties on [REDACTED] (built less than 5 years ago) display ‘a consistent pattern of rural living,’ as does my property (built 45 years ago), which is still proposed to be part of the LCZ.

Without applying rural living settlement criteria consistently and with ground-truthing, the evaluation then fails to consider whether landscape values can be managed through planning codes nor recommends any other outcome than LCZ, unless the area has no landscape values, which is unlikely given the bias and the subjective, non-consulted definition of ‘landscape values’ in which the planner used.

Homeowners in my area **strongly disagree** with Irenelnc’s narrow assessment. We can demonstrate that the Sproules Road area meets all three rural living settlement characteristics:

1. A pattern of at least 10 smaller blocks, generally between 1–15 ha, with a consistent lot pattern. The attached map in the document shows my property among 23 others in [REDACTED] area with lot sizes from 0.67 to 20 ha, a pattern established since the mid 1800’s. As you can see all properties can be managed by available RLZ lot sizes to minimise subdivision potential. Our settlement on [REDACTED] is adjacent to properties proposed for RLZ at [REDACTED]
2. A pattern of “detached dwellings and outbuildings,” which Irenelnc admits is generally met, as many lots have identified residences and cleared areas, even on heavily vegetated blocks. As you can see from the attached photographs, my property has the following house, garage, outbuildings, poultry yard, vineyard, flower beds and vegetable garden

This pattern is also demonstrated by properties with development applications or strategic plans for living on empty blocks.

3. Visual evidence of rural activities such as clearings, grazing and hobby farming etc. Irenelnc states that some residential uses are associated with farming, and at the review hearing, it was clarified that this list is only an example. My property shows cleared areas, poultry yard, gardens.

Specifically, the Snug area had been land granted by the Government of Tasmania in the 1822 for the purpose of rural settlement. Locations for forest reserves were identified and were set aside and held by the crown for protection. The area now observed has undergone extensive forestry, horticulture and agriculture activities in some areas for over 100 years. This has been and is clearly the strategic intent for the area. What is presently observed and enjoyed now is due to those land use activities not a restriction of them.

ASSESSING LANDSCAPE VALUES

The STRLUS CV 4.1 states that **community consultation** should determine landscape values. Irenelnc admits in review hearings that they didn't consult. This means the assessment of whether properties meet 'landscape values' is now entirely based on the Planning Authority's judgment.

Irenelnc's choice of dictionary terms 'hilly places' and 'bushland,' and focus on tree-centric descriptions, i.e.: 'predominantly bushland,' 'allotments set within native bushland,' 'dwellings are ... nestled into vegetation,' and 'bushland backdrop' are the main basis for our locality's landscape values.

This overlooks the value of other features like waterways, fields, foraging areas, and the importance of varied terrain (grasslands, clearings, open areas, trails). Such diversity is vital for a healthy rural or biodiverse landscape and aligns with evidence that people prefer varied scenery, including homesteads, sheds, and domestic livestock.

The lack of consultation and reliance on terminology that favours the Planning Authority's narrow definition results in a flawed or biased assessment:

1. Large areas of bushland and vegetation alone do not justify LCZ zoning. As confirmed at the TPC review hearing on 14/4/26, LCZ is not for managing vegetation—that is the role of the Natural Assets Code, which applies to all properties. Irenelnc stated that for properties in our area proposed RLZ, overlays will likely (and logically) protect the natural values they identify.
2. Describing dwellings and large lots around natural features as 'scattered' implies no strategic planning or intent, which is misleading.
3. This type of reasoning is biased: noting the large vegetated spaces on rural properties (and comparatively less dwelling area, as set by development criteria) is worded in the report as though this is a choice or evidence that OUR preference was

conservation over living: “integration of residential use ... is largely within a small proportion of a parcel”, “the remaining natural setting reinforces the area’s natural values”.

4. Owning private property in natural settings doesn’t mean residents prioritise landscape conservation over residential amenity. Irenelnc implies this repeatedly, both in review references to ‘built form’ being ‘secondary to the natural landscape’ and, in hearings, that large lots in bushland reinforce or ‘contribute’ to the area’s natural settings. The [REDACTED] residents purchased homes in natural areas because they value the contribution this makes to our Rural Living, not to add to Kingborough’s undefined scenic or ‘landscape values’.
5. Irenelnc relied on overlays in a desktop assessment to identify landscape or environmental values across the locality, ignoring the challenges of topography and identifying these (i.e., through the tree canopy) and by aerial images alone. Evidence-based alternative reports or maps of individual properties’ natural values are needed and available.
6. The scenic protection overlay is broadly applied to properties over 100m above sea level. The photos used in the report, sourced from realestate.com, are aerial shots intended for sale and don’t accurately reflect what is seen from local roads, towns, or waterways. Even Irenelnc admits that in the locality ‘bushland, landform, and ridgeline features ... remain visually intact,’ and the reality is that the siting of homes in the area means the majority cannot be seen from these vantage points.

In specific to actual “Natural Landscape Values” those which are not presently located within the current state reserve system, has been historically disturbed by human activities they are usually located in small, isolated remnant patches which are not readily accessible and really should be the focus of LCZ application. As identified within the purpose defined for Landscape Conservation Zone in the TPS scheme the zone has **“important landscape and natural values”**.

Please note the **Image 1** below illustrates the present observations of point locations from the Natural Value Atlas database and along with **Image 2** which is the corresponding input layers of the natural values biodiversity layer produced for BRAM 2025 specific to the Snug, Conningham area. These are produced for PWS from the Threatened Species Section of the Department of Natural Resources and Environment Tasmania which are the state’s experts in flora, fauna and geo-conservation and have been annually for the last 16 years.



Image 2: Biodiversity Inputs for Snug/Cunningham

In regard to landscape value protection, I am sure you are aware that Tasmania is leading the country at protecting over 50% of the state in a parks in reserve system, followed by Western Australia at 31%, South Australia 20%, Victoria 18%, Northern Territory 15%, New South Wales 10% and last being Queensland at 9%. In addition, areas outside this are offered protection through state and federal legislation along the application of existing land use overlays. If an owner feels that these protection measures aren't sufficient to their specific circumstances, he could voluntarily undertake a Conservation Covenant with the state government on the area.

If the Kingborough council and Tasmania Planning Commission wish to apply LCZ to previously zoned Environmental Living Zone, the burden of proof should fall on the council to show that the land does have "high value biodiversity". In addition, must prove that the existing and previously approved land use activities/practices have caused negative impact and these values required further protection methods which are not presently available through the application of the existing land use overlays.

To develop of a methodology to capture areas deemed to have LCZ characteristics you first need to identify unique flora/fauna, biodiversity and landform features that require additional level of protection which is not already provided by the existing overlays and or zones. When analysing the presented zoning outputs, it appears that what has happened was to identification of broad forested landscape which mainly consist of regrowth vegetation. At times, it appears that aerial imagery forest cover is being used as a surrogate to support and identify landscape values. I do not believe regrowth vegetation is listed as having a unique and threaten landscape value and require another level of protection from land use activities. When comparing NVA, biodiversity, landslip hazard and landslip polygons data to the areas targeted for LCZ zoning there is no consistent correlations, which you would assume there should be a linkage.

What has been achieved using the present methodology is the maintenance of the existing visual skyline irrelevant on whether the area has any unique landscape value or not. If visual skyline is a primary objective of the LCZ zoning process, there are many software programs currently available which will allow a user to manipulate canopy density and orientation of linear clearings to determine whether viewshed integrity are affected without the need for a blanket LCZ zoning application.

Some examples of inconsistency of the application zoning methods are as follows.

- areas along the start of Snug Tiers Road both north and south of the road and before Snug Falls Road has "significant" forest cover along with significant NVA observations was zoned LCZ now changed to be zoned RL or RLZ
- areas east of the Channel Highway and west of Old Station Road has "significant" forest cover, along with the Threaten Native Vegetation Community of "Eucalyptus amygdalina forest and woodland on sandstone" was zoned LCZ now zoned R.

LANDSCAPE CONSERVATION ZONE IMPLICATIONS

In reviewing the definition of Landscape Conservation Zone. Section 22.4.4 Landscape Protection under P1 Performance Criteria P1 states that Building and works must be located to minimize native vegetation removal and the impact on landscape values, having regards to:

- a) The extent of the area from which vegetation has been removed
- b) The extent of native vegetation to be removed

Properties zoned LCZ adhering to those conditions outlined in the definition are putting their residence at an increased risk from bushfire impact. With any existing or newly developed residence there is a requirement from the owner to maintain a defendable space adjacent to his building. In addition, the maintenance of a low fuel load in the surrounding forest stand structure will increase the survival rate of his structures impact from bushfires.

To be compliant with the existing state legislation and guideline (some listed below) any occupied land with a residence is approved and will be required to modify existing vegetation surrounding their development through either removal or prescribed fire.

Fire Service Act 1979

Section 49 Fire hazards (1) Where, in the opinion of the Commission or an authorized officer any hedge, vegetation, rubbish, or similar matter in or on any land or premises is in such a condition, or, if permitted to remain in or on the land or premise, would become in such a condition as to constitute a fire danger, the Commission or authorized officer may, by notice in an approved form given to the occupier of the land or premises, require the occupier to take such steps as the Commission or authorised officer may require, and as may be specified in the notice for the-

- a) trimming, cutting back or removal of the hedge or
- b) burning off, or removal of, the vegetation, rubbish, or matter

Section 56. Formation of firebreaks

2) The Commission may, in accordance with this section, cause the formation of such firebreaks as it considers necessary or desirable to arrest the spread of fires that may occur in any part of the State or to facilitate the suppression of any fires

Section 66. Permits to light fires

(1) A person shall not, during a fire permit period, light or cause to be lit, or maintain or use

(b) a fire for the purpose, or that is likely to have the effect, of clearing vegetation from the land or for a like purpose-

Except under the authority and in accordance with the conditions of a permit granted by a fire permit officer in accordance with this section.

Planning Directive No 5.1- Bushfire Prone Areas Code

This directive mandates that new developments and subdivisions in bushfire-prone areas provide defensible space (hazard management areas)

Requirements for Defendable Space (Hazard Management Areas)

According to the Tasmanian Planning Scheme and Tasmania Fire Service guidelines:

- Definition: Defendable space is an area of land around a building where vegetation (fuel) is modified and managed to reduce the effects of flame contact and radiant heat
- Size: The requirement separation is generally calculated through a Bushfire Hazard Management Plan based on the site's vegetation, slope and Bushfire Attack Level (BAL)
- Maintenance: Hazard management areas must be maintained in a minimal fuel condition, with no other hazards present that will contribute to the spread of a bushfire
- Components: These areas often include an inner protection zone (Minimum fuel condition) and an outer protection zone (moderating fire behaviour)

When investigating the state of the current forest fuel loads for the area around Snug Tiers the Australian Fire Danger Rating System (AFDRS) fuel grid provided the following information.

TAS Forest (Vesta): 7101 Dry forest with shrub		
Fuel model Jurisdiction TAS SHOW LESS	Fuel type Forest	Sub fuel type 7101 Dry forest with shrub
Surface Hazard Score 3.32 Must be between 0-4 Tonnes per hectare 13.48 Must be between 0-12	Elevated Hazard Score 1.9 Must be between 0-4 Tonnes per hectare 1.2 Must be between 0-10	Canopy Tonnes per hectare 0 Must be between 0-10 Wind Reduction Factor 3.5 Must be between 0-5
Near surface Hazard Score 3.09 Must be between 0-4 Tonnes per hectare 0 Must be between 0-8	Bark Hazard Score 1.74 Must be between 0-4 Tonnes per hectare 2.66 Must be between 0-8	

Fuel model

Jurisdiction

TAS

SHOW LESS ^

Fuel type

Wet_forest

Sub fuel type

7154 Wet Forest shrub

Surface

Hazard Score

4

Must be between 0-4

Tonnes per hectare

11

Must be between 0-12

Near surface

Hazard Score

2.98

Must be between 0-4

Tonnes per hectare

0

Must be between 0-8

Elevated

Hazard Score

0

Must be between 0-4

Tonnes per hectare

0

Must be between 0-10

Bark

Hazard Score

0

Must be between 0-4

Tonnes per hectare

4.97

Must be between 0-8

Canopy

Tonnes per hectare

0

Must be between 0-10

Wind Reduction Factor

4.5

Must be between 0-5

Present fuel loads in forested fuel types are at such a level that if mitigation work is prevented around building protection zones and in the adjacent stands, if a bushfire would occur intensities would be at a level that survivability of structures would be in doubt. Research presented by David Bowman, Professor of Pyro-Geography at the 8th International Wildfire Conference held in Hobart highlighted that “at zero distance from the bush, dwellings had a zero chance of survival and that the risk reduces the wider the break, at 100m from the bush the chance of survival for built structures increased to 60 percent.

Research also indicates the regrowth stands are more flammable the mature forest cover so there will be a need for fuel modification through either cleaning, thinning or fuel reduction burning adjacent to residence to ensure survival rate of residences in case of a bushfire. (see below article)

ABC NEWS



Log in



Study finds Tasmanian native forest logging increases potential for more severe bushfires



By Madeleine Rojahn

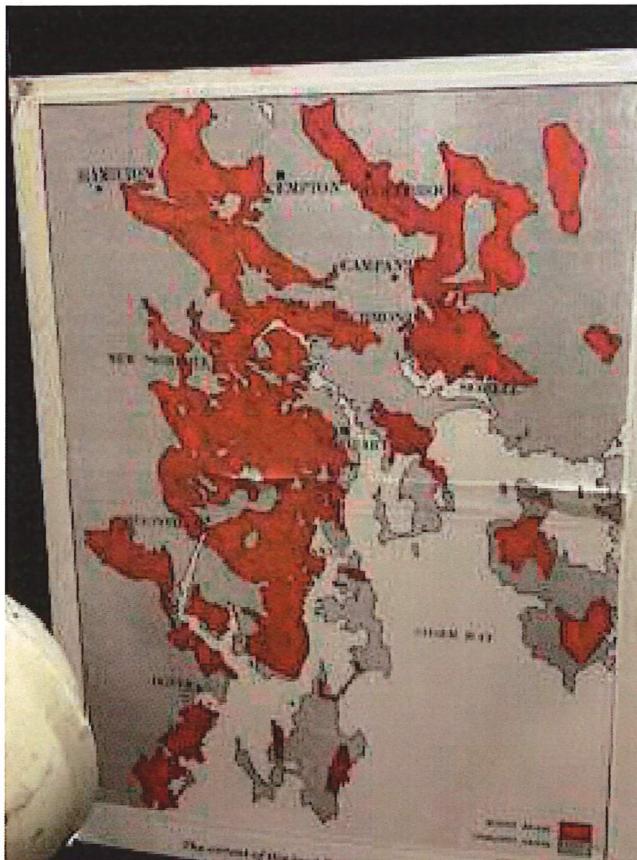
Bushfires

Fri 10 Apr



A fire expert says mature forests can “act as a buffer” to slow bushfires, whereas regrowth eucalypts are more flammable.
(Facebook: Dardas Ferry Fire Brigade)

The Snug area has been historically impacted by large bushfires: 1897-98, 1967 and again in 1993-94.



Historic fire boundaries – Kingborough and surrounding areas (February 1967).



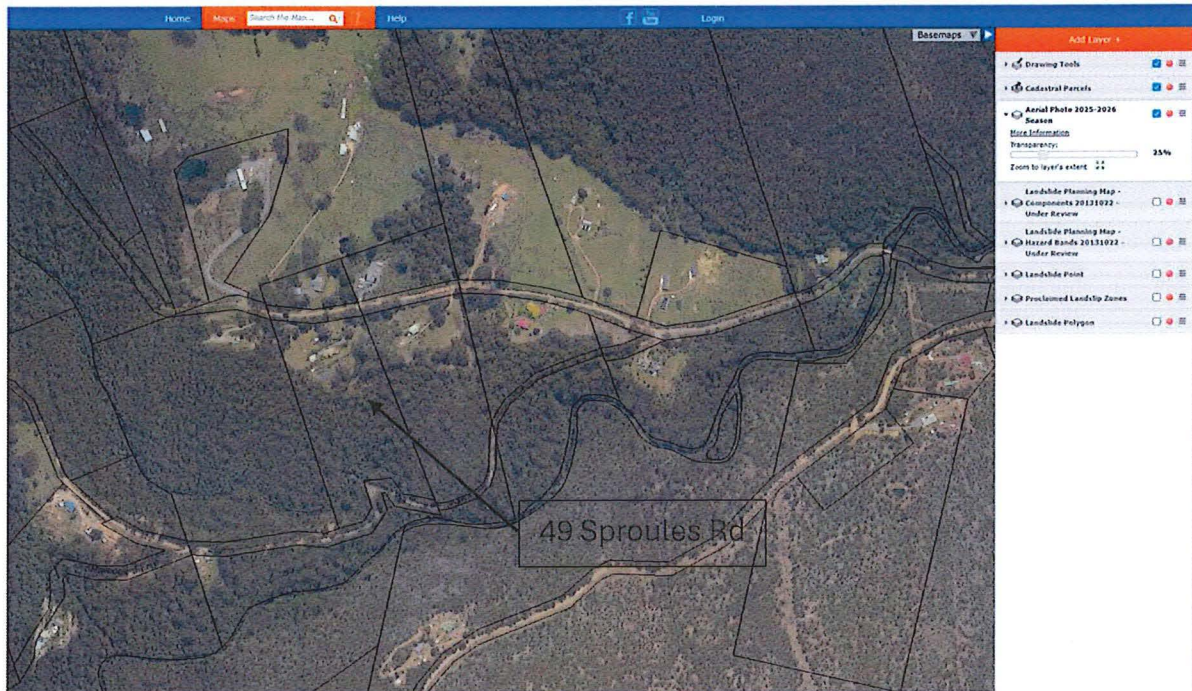
Impact of 1967 bushfire on the Snug community (photograph from Channel Museum)

GENERAL SYNOPSIS

Objectives of any plan must be clear, concise, measurable and achievable. The methodology used to undertake a planning zoning exercise must be defensible and repeatable, so identical outcomes are achieved no matter the number of times it is undertaken and irrespective of the planner. Strategic intent must be factored in the decision and planners must take in consideration historical, present and future use for the land base and consultation must be undertaken with landowner especially if it is occupied. If desktop exercise must be undertaken it must be followed by ground truthing to ensure that generated outputs validate assumptions. This will ensure high level of confidence in outputs. The present method employed by Kingborough is flawed, inconsistent and display bias. The process needs to be reviewed, rewritten in a consistent and unbiased manner.

Review and analysis on PID [REDACTED]

[REDACTED] Snug



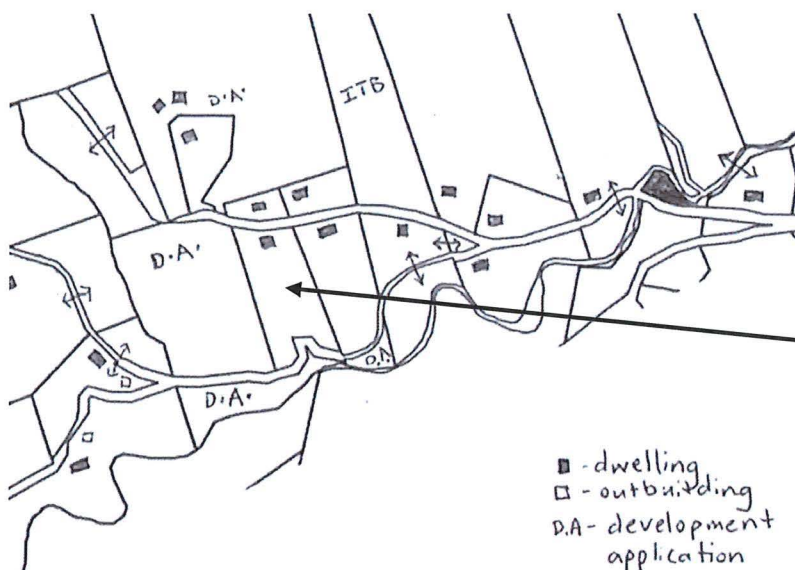
2026 Orthophoto display well the current forest cover along [REDACTED]

Chronology history and evidence indicate that [REDACTED] was used as logging road for timber harvest operations that occurred pre-1900's. From the early 1900's to 1980's the majority of the land surrounding [REDACTED] was used in free range grazing operation and small fruit horticulture undertaken by the Sproules family (personal conversation Mike Avery - April 10, 2026). Four generations of Sproules lived and worked in Snug, Sproules Road and Snug Tiers area (Adam Sproules 1810-1892, Adam William Sproules 1852-1930, Benjamin Myrtle Sproule 1885-1978, Baden Sproules). Extracts from the book "Days Gone by in the Channel" by Madge Lowe -Volume 1, indicate the following:

- Adam Sproule of Paisley Scotland was given 2 land grants in Northwest Bay area 1851
- Family worked in the logging in the Snug Tiers area late 1800's early 1900's
- Mixed farming of raspberries, gooseberries, black currents, vegetables, potatoes occurred on site early to mid-1900's
- Farm was self-supporting of milk cows in the 1930-40's
- An area abattoir was in operations on Sproules road early 1940's



Survey Plan Snug Tiers (1955) indicate the Strategic Intent of a well-established rural living settlement of various size lots occurring on the north of Snug River. Please note area south of the Snug River as a continuous lot presently showing NO intent of rural living community development



Current Rural Settlement community along

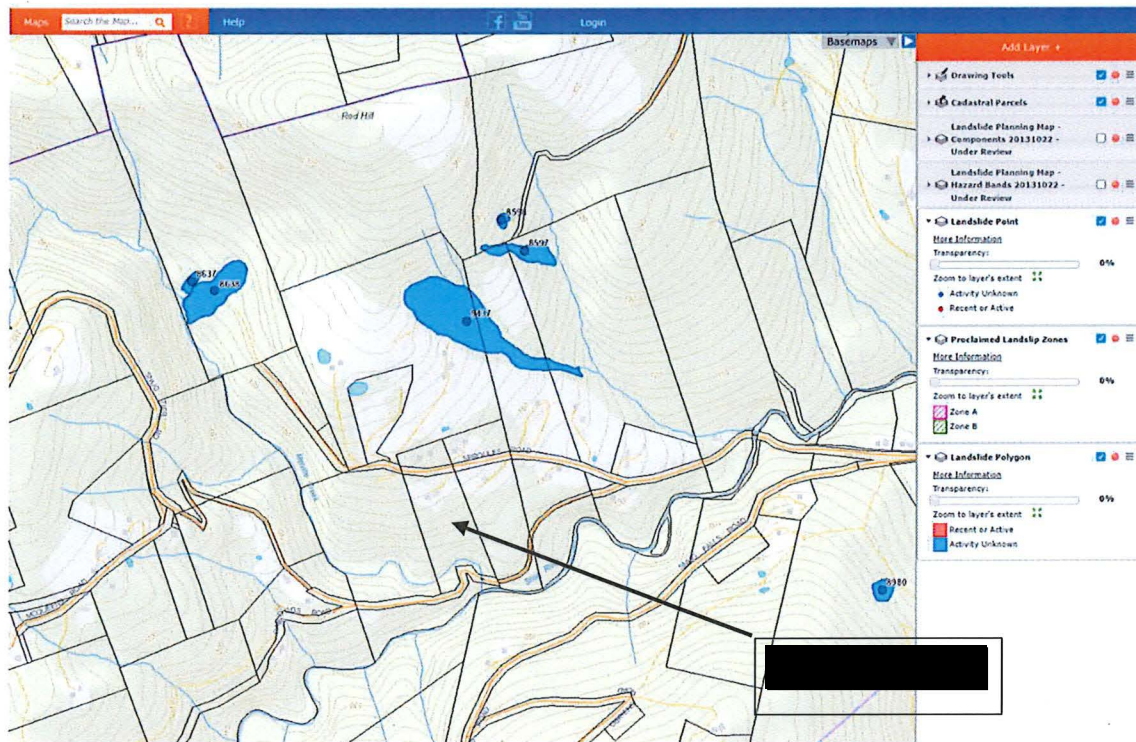


Evidence of old Stock loading facilities at the end of [REDACTED] (mid 1900's)

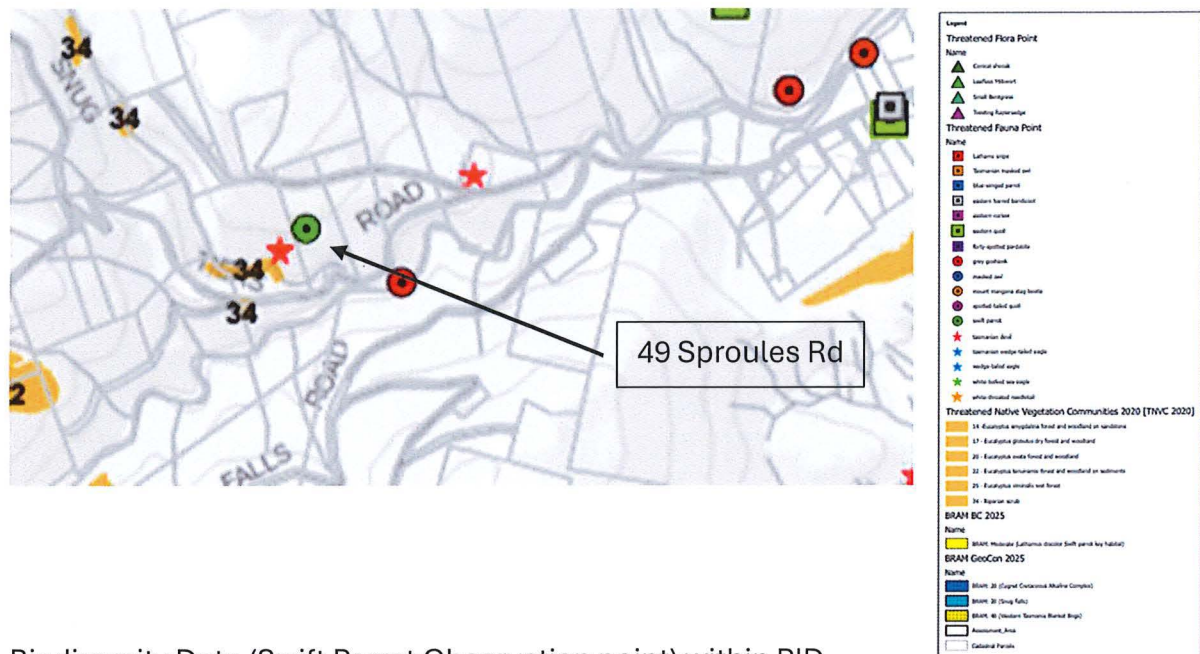


Evidence of old hand laid roadworks along the forest reserve road at the end of [REDACTED]
[REDACTED] used to extract timber(pre-1900's)

Landslide Polygon/Landslip Point/ Proclaimed Landslip Zone – The LIST



Proclaimed Landslip Area



Biodiversity Data (Swift Parrot Observation point) within PID

Only a single occurrence of natural value noted.

The residence of [REDACTED] was built in 1991 and was purchased by David Taylor in 2007 for use of rural residential lifestyle. This includes the planting of fruit trees, grapes, kiwi, vegetable garden along with the maintaining of a poultry flock.

PID [REDACTED] land is currently being managed by the owner to safeguard both the residence and outer building as prescribed in Planning Directive 5.1. In addition, natural value habitat trees are protected by removing the accumulation of ground fuels which surround the sites.



Image 1: PID [REDACTED] Asset Zone the area adjacent to building defined by manicured lawn, and placement of native and exotic shrubs



Image 2: PID [REDACTED] Protection Zone 1 area adjacent to asset zone, removal of ground fuel, understory and lesser vegetation, only dominant trees remain. Area has horticulture and agriculture activities (note habitat tree in foreground area cleaned and raked around base to protect against bushfire impact) minimum fuel level maintained 1-2 t/ha



Image 3: PID [REDACTED] Protection Zone 2 area ground fuel removed along with lesser vegetation, dominant and co-dominant trees remain (2-5 t/ha)



Image 4: PID [REDACTED] Protection Zone 3 area accumulation of dead ground fuel is removed on a 15–20-year cycle reducing the fuel load (10-15 t/ha)



Image 5: Land adjacent Unmodified Stand showing the vegetation arrangement and present fuel loads (20t/ha plus)

SUMMARY

Analysis from available data regarding landscape values (flora, fauna, biodiversity, Natural Value observations, landslip hazard and active) indicate very little activity or current observations. The area surrounding [REDACTED] has supported historical, recent horticulture and agriculture practices which support the strategic intent for rural living settlement for over 100 years.

Throughout the LPS process, Kingborough Council has failed to consult the community and has not followed the objectives of LUPAA, which emphasise fair land use and community involvement. Their focus on environmental protection seems aimed at removing private land rights, risking long-term harm to residents' well-being and creating potential future financial and legal challenges.

I appreciate the TPC taking in consideration my concerns within this document and respectfully ask for rezoning properties from ELZ to more restrictive zones to be stopped. Specifically, I request that the TPC direct my property to be zoned from the ELZ to the **Rural Living Zone B**, with environmental priorities managed by existing natural values codes.

Yours sincerely,

Please feel free to contact to discuss further.

[REDACTED]

David Taylor

[REDACTED] Snug

[REDACTED]

[REDACTED]

Retired Strategic Fire Planning Officer

for Parks and Wildlife Service Tasmania