

Representation No. 23

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From: Simon Roberts <simonroberts2@gmail.com>
Sent: Wednesday, 8 April 2020 1:15 PM
To: Circular Head Council <council@circularhead.tas.gov.au>
Subject: Simon Roberts- submission to LPS

Dear Sir/Madam,
Please find attached my representation to the Circular Head LPS public comment process.

Yours Sincerely,
Simon Roberts

Simon Roberts
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Scott Riley
General Manager
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Representation for the Draft Circular Head LPS – Application of the Landscape Conservation Zone (LCZ).

This submission is in response to the council's process of applying the Landscape Conservation Zone to a very limited number of properties.

Apart from transitioning 105 properties from Environmental Living to LCZ the supporting report of council used the Tasmanian Planning Commission Guidelines (the guidelines) to identify 17 properties on the basis of their current ecological status, current use or potential impact on scenic values. Each landholder was consulted and the LCZ was applied if their preference was not to retain their agricultural rights.

The council provides very little supporting information on the process used to identify these properties. It is unclear whether a standard methodology was applied across the whole of the municipality and if so what specific criteria were used and how they were weighted? Appendix A provides some insight into some of the planning decision criteria that have lead to LCZ being applied such as:

- Riverine/Coastal property near to shack and residential development, containing large areas of quality native veg.
- Low grade farmland bound by conservation land and reserve.
- High conservation remnant veg adjacent to Indigenous Protected Area and Coast -Less than 30% of property used for grazing Ag.
- High conservation value land – highly restricted farmland + Tourism use.
- Land bound by state reserves and zoned Env. Man therefore more appropriate to be Landscape Conservation Zone
- dune area – shacks
- Large lot (includes two small lots) largely intact high value coastal bushland adjoining sensitive wetlands
- High conservation value bushland with small ag component - located between Env. Man reserve areas

The guidelines provide a number of opportunities for planners to consider the LCZ as an alternate zoning in particular circumstances:

LCZ 1 The Landscape Conservation Zone should be applied to land with landscape values that are identified for protection and conservation, such as bushland areas, large areas of native vegetation, or areas of important scenic values, where some small scale use or development may be appropriate.

RZ 1 The Rural Zone should be applied to land ... which is not more appropriately included within the Landscape Conservation Zone or Environmental Management Zone for the protection of specific values.

AZ 6 Land identified in the 'Land Potentially Suitable for Agriculture Zone' layer may be considered for alternate zoning if:

(c) for the identification and protection of significant natural values, ... which require an alternate zoning, such as the Landscape Conservation Zone or Environmental Management Zone;...

There is a large area of the Circular Head municipality that would potentially meet the criteria of LCZ 1, RZ 1, and AZ 6. The priority vegetation mapping is widespread over most of the municipality and a number of significant wetlands and reserves are present. Inspection of the LIST map "threatened native vegetation communities" layer shows that there are many areas of threatened vegetation that are currently zoned Rural

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and Agricultural which are likely to meet the criteria used by the council and could be more appropriately zoned LCZ.

The LCZ is recognition that there are large areas of Tasmania that contain significant broad scale environmental and scenic characteristics that may be compromised if the traditional “rural” or “agricultural” zonings are applied. The LCZ allows for many rural and residential uses if it does not compromise these values. The broad scale use of this zoning in areas with relatively intact bushland is consistent with the fact that many of our threatened plant and animal species and threatened vegetation communities are underrepresented in the reserve estate and are threatened by inappropriate development on private land. These areas are also often critical to the survival of many of our threatened species. The LCZ should be considered in vegetated non residential areas where resource extraction or agricultural use are restricted, as is the case for many areas in the Circular Head municipality.

Land capability in most of the municipality is class 5 or greater with only a very small percentage of land class 3 or less which would classify it as “prime agricultural” land under the State Policy on the Protection of Agricultural Land 2009. As most of the municipality is classified as “non-prime agricultural land” its conversion to non-agricultural use should be considered in relation to its local and regional significance to agricultural use. There is no analysis provided on the relative significance of agricultural use in different parts of the municipality or the North-West region of Tasmania which could be used as a basis for identifying areas that could be appropriately zoned LCZ.

Similarly the use of the Regional Ecosystem Model (REM) as a tool to identify areas that may need further ecological protection than that provided by the Rural and Agricultural Zone would seem logical. The REM integrates spatial data on the distribution of the major components of biodiversity, and the factors affecting them, it;

- Models key biodiversity attributes that derive from multiple inputs;
- Analyses the relationships among the components of biodiversity and the environment; and
- Spatially identifies areas which have immediate or potential conservation concerns, and provides indicators of their relative importance, to inform approaches and priorities for management.

The REM output specifically identifies areas using an integrated measure of biological sensitivity called Landscape ecological function (LEF). The LEF is defined as - the ability of the landscape to maintain the elements of biodiversity it contains. The LEF output is particularly relevant to the use of LCZ as it provides mapping of areas defined as either;

Landscape function – **Potential**. Landscape function is sensitive to further loss or degradation. Consider what action can be take to secure landscape attributes; or

Landscape function – **Immediate**. Landscape function is degraded. Consider what aspects of can be improved – condition, patch size, riparian vegetation or connectivity.

Clearly these attributes are relevant to the use of LCZ as the zones purpose is to:

22.1.1 To provide for the protection, conservation and management of landscape values.

22.1.2 To provide for compatible use or development that does not adversely impact on the protection, conservation and management of the landscape values.

The guidelines note that:

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

Together the Landscape Conservation Zone and the Environmental Management Zone, provide a suite of environmental zones to manage use and development in natural areas.

The very low application of the LCZ in the Circular Head Municipality indicates that there has been only limited consideration of the potential natural values present in the landscape and no systematic process to determine the potential use of LCZ as a broad scale “rural” zoning in areas with the characteristics described in LCZ 1. It is also relevant that many of the objectives of the State Coastal Policy would be more appropriately managed if

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land within the coastal zone was zoned either Environmental Management or Landscape Conservation where appropriate.

A more holistic and systematic approach to the use of LCZ as a broad scale zoning in conjunction with the Rural and Agricultural Zone would also be consistent with a number of objectives of the Resource Management and Planning System of Tasmania, specifically the Part 1 objectives;

(a) To promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity.; and

(b) to provide for the fair, orderly and sustainable use and development of air, land and water.

And the Part2 objectives;

(c) to ensure that the effects on the environment are considered and provide for explicit consideration of social and economic effects when decisions are made about the use and development of land

(d) to require land use and development planning and policy to be easily integrated with environmental, social, economic, conservation, and resource management policies at State, regional and municipal levels;

Yours Sincerely,

Simon Roberts