

From: www.wwtas.wvtas
To: Development
Cc: wwtasptyltd@gmail.com
Subject: RZ2020/03 - West Brighton Specific Area Plan
Date: Sunday, 22 November 2020 11:27:38 PM

Hi

Please accept this representation in regards to the proposed West Brighton Specific Area Plan amendment.

I make the following comments:-

1. The proposed rezoning of the quarry at 252 Elderslie Road is completely inappropriate. The quarry has existed for some 60 years and the works extend across the entire 2ha site. The quarry is actively worked and has a number of years remaining before the available resource is sold and the site rehabilitated by the import of clean fill. The site has no current or future potential for the quarry site to be utilised for an intensive agricultural use. After the rehabilitation of the site except the land could only utilised for very restrictive and low intense grazing - something reflective of the current zoning. The quarry is sited between the 110m-150m contour and is exceptionally steep. The site has no potential for irrigation or to be serviced by TasWater mains. The zoning of the quarry site is best suited to Rural Resource. It is not appropriate to rezone the land given it's long term use and inherit constraints. In addition; your own "West Brighton & Rosewood Zoning Review" report provides that Council should give "consideration be given to applying a Rural Zone to the Stonefield reception centre and the Elderslie quarry". The quarry should be removed from the proposed West Brighton Specific Area Plan.
2. Similarly; the zoning of land on both the west and east side of the quarry side should also be zoned Rural Resource above the 110m-120m contour line. These properties are; not arable, steep (with a slope of approximately 1 in 2.5) and have a land capability of class 5 or worse which is by definition not suitable for cropping. The Rural Resource zoning would also reflect the zoning of the land to the south of the ridge line. These areas should be removed from the proposed West Brighton Specific Area Plan.
3. The zoning of the long standing commercial site at "Stonefield" should be Rural Resource. The site is a commercially viable reception site that has an existing dwelling and conjoined accommodation premises. A rezoning of this premises is unjustified. It would appear to only be suggested as an attempt provide a bulk zoning and does not reflect the long term use of the site.
4. Part 3.4.1 of the amendment - a commercial agricultural use is defined as "an agricultural use making or intended to make a profit". This definition does not rightfully quantify the intensity of the agricultural use required to suitably protect the area from pseudo rural residential living whilst at the same time enabling the area to be promoted for future agricultural use and protecting the current and future agricultural character. The Performance Criteria provides that the residential use must provide an income and contribute to the region's agricultural economy. This statement is worthless and provides no minimum standard of investment or expected income. Any permitted new dwelling should have an agricultural use that produces an intended profit over and above a specified definition or value. Although profit equals income plus variable costs plus overhead costs which include owner's labour, the profit must be significant enough to justify the residential activity and expenditure. By definition a commercial agricultural use is a large scale farming activity. The commercial agricultural use must be detailed and quantified by a

qualified agricultural consultant and accountant.

Regards

Michael Whelan