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Sent: Mon, 30 May 2022 20:08:53 +1000
To: hvc@huonvalley.tas.gov.au;lachie.kranz@gmail.com
Subject: Planning Representation - Lachlan Kranz and Madeleine Gasparinatos - {Application No:7}

Your representation has been submitted.

Please note: This representation may be subject to the provisions of the Right to Information Act 2009 which may result in its disclosure to a third party.

I/We (name)
Lachlan Kranz and Madeleine Gasparinatos
Are you lodging as a Individual, Company or Organisation
Individual/s
Of Address
54 Turners Rd
Town or Suburb
Cradoc
Postcode
7109
Email
lachie.kranz@gmail.com
Phone Number
0421808022
File
<ul style="list-style-type: none">• 54-Turners-Rd-Cradoc-LPS-rep.pdf
Submit Application
<ul style="list-style-type: none">• Yes Submit

To whom it may concern,

Madeleine Gasparinatos of 54 Turners Rd Cradoc makes this representation to the draft Huon Valley Local Provision Schedule.

Madeleine Gasparinatos. Email madeleine.gasparinatos@gmail.com ph 0438 025 370

On the merits submitted below, our representation establishes that the characteristics of our property, 54 Turners Rd Cradoc (PID 5857089), are better aligned to the Rural Zone as opposed the Agriculture Zone as drafted.

Our representation is based on the application of two reports: *Decision Tree and Guidelines for Mapping the Agriculture and Rural Zones (2018)* and *Agricultural Land Mapping Project - Identifying land suitable for inclusion within the Tasmanian Planning Scheme's Agriculture Zone (2017)*. The decision tree document was commissioned to "assist member Councils delineate the new Agriculture and Rural Zones which will be established from the existing Rural Resource and Significant Agriculture Zones under the new Tasmanian Planning Scheme."

The document comments that "Assigning land to either zone will not affect existing or future agricultural activity occurring...", and "The Agriculture Zone is designed to primarily protect the land for agricultural use, while the Rural Zone allows for a greater range of uses that are not necessarily related to agriculture."

The primary aim of the *Agricultural Land Mapping Project - Identifying land suitable for inclusion within the Tasmanian Planning Scheme's Agriculture Zone* project is to "identify Tasmania's existing and potential agricultural land, and to provide guidance to local planning authorities on the spatial application of the Agriculture Zone within their municipal area. This will avoid a repeat of the inconsistent use and application of the zones that occurred in the preparation of the Interim Planning Schemes."

Our summary of the report(s) as they apply to 54 Turners Rd Cradoc is as follows;

1. 54 Turners Rd Cradoc is mapped as *Potentially Constrained (2B)* in the *Land Potentially Suitable for Agriculture* layer established by the *Agricultural Land Mapping Project - Identifying land suitable for inclusion within the Tasmanian Planning Scheme's Agriculture Zone*
2. Titles that are mapped as *Potentially Constrained (2A, 2B or 3)* in the *Land Potentially Suitable for Agriculture* layer are intended to be investigated by Council to determine which zone (Ag or Rural) is more appropriate.
3. 54 Turners Rd Cradoc has draft zoning *Agriculture* applied due to its current zoning of *Significant Agriculture* under the *Huon Valley Council Interim Planning Scheme 2015* however Council has not investigated the appropriateness of the Agriculture zoning for this title.
4. Section 3.2 6 (e) of the *Agricultural Land Mapping Project - Identifying land suitable for inclusion within the Tasmanian Planning Scheme's Agriculture Zone* states:
"Land identified in the *Land Potentially Suitable for Agriculture Zone* mapping layer may be considered for alternate zoning if it can be demonstrated that:
(i) the land has limited or no potential for agricultural use and is not integral to the management of a larger farm holding that will be within the Agriculture Zone;
(ii) there are significant constraints to agricultural use occurring on the land; or

(iii) the Agriculture Zone is otherwise not appropriate for the land”

Therefore as a potentially constrained title, 54 Turners Rd Cradoc may be alternatively zoning by taking account of economic and physical constraints such as soil productivity, lot size, capital value and connectivity. To consider these constraints we submit the characteristics of our property against the decision tree for agriculture value as follows;

Characteristics of the title	Agriculture value of 54 Turners Rd Cradoc
Title size	Low value: - Smaller size (13 ha).
Development on the title	Low value: - House on site with a new architectural residential development completed in 2021. - Aged farm infrastructure (shed and fencing) is in disrepair and dates to the 1960's when the title was an apple orchard. All irrigation was removed when the orchard was decommissioned and the dam does not hold water through summer.
Connectivity. Other than non-agricultural developments topographical constraints, reserves, threatened vegetation, major water courses and roads, steep slopes, swampy ground etc can limit connectivity.	Low value: - Adjacent agriculture titles are small and all are encumbered by existing dwellings. - Huon Valley Councils Regional Ecosystem Model shows both potential threatened fauna habitat and threatened vegetation communities overlaying approximately 1/3 of the title area. - Immediate interface with Priority Vegetation Areas on five adjoining titles.
Current and potential use	Low value: - Current sheep grazing DSE is 49.5 with a DSE/ha of 7.07. This is orders of magnitude below commercially viable stocking numbers. - Potential agricultural uses are significantly fettered by existing residential developments on all adjoining titles draft-zoned as Landscape Conservation. - This title was not viable as an apple orchard as part of a much larger farm last operated in the 1960's. It has subsequently had failed attempts at commercial Blueberry and Hazelnut growing in the 80's/90's.
Land capability	Low value: - Mapped as LC5.
Water available for irrigation	Low value: - No irrigation resource.
Regional context	Low value: - Isolated from labour, facilities and markets. Huon producers have identified access to pickers is a worsening situation with larger

	growers relying on international labour hire while many smaller growers have left crops on the tree in the 2022 season for want of pickers.
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With reference to section 3.2 6 (e) of the *Agricultural Land Mapping Project - Identifying land suitable for inclusion within the Tasmanian Planning Scheme's Agriculture Zone*, the table above demonstrates that clauses (i) and (ii) are met as the land is low value for agriculture and constrained on every economic and physical measure. We believe this low agricultural viability means 54 Turners Rd Cradoc is better providing for rural support industry and therefore the title should be zoned Rural.

Whilst this is demonstrated for the single title, we understand achieving a consistent zoning pattern is a State priority as discussed within Table 4 of the Zoning Guidelines section of *Decision Tree and Guidelines for Mapping the Agriculture and Rural Zones (2018)*. This sets out that "to avoid spot zoning of individual titles a minimum of 3 titles should be investigated (depending on size and scale of titles) for a zone."

Our immediate neighbour at 111 Turners Rd Cradoc (PID 9958033) presents as a fragmented single title zoned as Rural sitting between Agriculture and Landscape Conservation zoned land. Zoning 54 Turners Rd and 100 Turners Rd (PID 5857118) as Rural would remove this spot zone, creating a 3-title group of PIDS, 5857118, 9958033 and 5857089 zoned Rural with the added benefit of providing a buffer between Landscape Conservation and existing Agriculture on titles at Lot 1 Turners Rd and Armstrong's Rd Cradoc.

In summary, we have evaluated the constraints to agriculture, established that Rural is a more suitable zone and addressed the opportunity to achieve a consistent zoning pattern with neighbouring titles.