

Re response to the letter dated 2 April 2026.ref DOC/26/36829) The Ireneinc report recommends my property [REDACTED] Gordon remains within landscape in conservation zone under the draft Kingborough local provision schedule.

Landowner name: Grant Mitchell Reynolds

Property address: [REDACTED] Channel Highway Gordon

Title Reference: [REDACTED]

Lot size: 81.12Ha

Locality: Gordon

Current IPS Zone: 14.0 Environmental Living

Draft LPS exhibited Zone: 22.0 Landscaping Conservation Zone

Ireneinc recommended Zone: Landscaping Conservation zone

Zone sought in this submission: Rural Living Zone. The specific subcategory I seek is

.Rural Living Zone C or Rural Living Zone D

Both these Rural Living Zones reflects the existing lot pattern of my locality (see attached planning map)

I have had no input or opportunity to submit my objections until receiving this letter ,after returning home on the 14 th of April 2026 as I have been in Melbourne Epworth icon cancer centre having treatment for a head/brain tumour.

The Lack of communication and correspondence is very frustrating and disappointing considering I am still in recovery mode and endeavouring to lodge a submission to challenge / contest the Landscape Conservation Zone.

This submission is from Grant Reynolds in regards to my property at [REDACTED] Gordon. I am Requesting that my property Zone be changed and seeking Rural Living Zone (which is more in line with my current Environmental Living Zone) and contesting/ opposed to Landscape Conservation Zone.

I purchased my property December 2024 settlement February 2025 advertised as residential land 80.19 hectares under Environmental living Zone where residential living and development is the primary purpose, a rural native vegetation bush block with potential approval for a home site .The Purchased of my land is part of my superannuation investment as this parcel of land has 5 separate titles.(approximately 16 hectares per title)but my main objective and intention is to maintain the property as is and this to be my residences to live in a quite peaceful rural bush(native vegetation) setting .This is my only property.

.i would definitely not have purchased the land where the primary purpose was conservation especially after reading the Negative Impacts Reference Document LCZ and RZ compared to RLZ kingborough LPS direction 69.



Historically my property has the remains of at least two pre-existing dwellings / ruins, old dry rock wall fences and evidences of clearings where original paddocks would have been.

Gordon is set in a rural setting with most properties having an area of cleared ground around their dwellings with the balance of the land covered in native vegetation.(Vegetation is already protected under the Natural Asset Code.)The primary land usages were timber milling, logging industry, small apple orchards and general farming area in the past.

I am finding difficulties to navigate and comprehend the Tasmanian Planning scheme Kingborough draft with limited time and knowledge to address the criteria's.

I am utilizing the Tasmanian Planning Commission Kingborough LPS submission Template T1 (contesting LCZ Retention seeking RURAL LIVING ZONE) guideline to lodge a submission.

Due to the limited time, lack of communication and short notice of receiving the letter regarding the re zoning of my property I have not had the opportunity to obtain professional planning advice.

Grounds for this Submission

D1.1: The Zone Guidelines prohibit LCZ where priority is residential;

My property was purchased in January 2025 primary use for Residential purposes under the current Zoning Environmental Living.

D1.2: The LCZ is not a replacement zone for the ELZ

No comprehensive site specification reports supplied for my property

D1.3: The RLZ is the appropriate zone under the zone Guidelines.

My property comprises an area of 81.12ha which is applicable and consistent with Rural Living Zone C or D. .(This is my potential home base I have no other options.... homeless)

D2.1 My Property has a strategic residential intention.

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

My Property is situated within a network of predominantly rural properties with established dwellings and farming land. Adjoining [REDACTED] Gordon and [REDACTED] Gordon. These neighbouring properties with substantially similar characteristics (elevated bushland vegetation) and the same identical current code overlays and proposed code overlays are being proposed 20.0 rural and my locality received LCZ.No clear reason for the difference.

Neighbouring properties as listed.

[REDACTED] 56.18 ha zoned Rural Resource

[REDACTED] 34.96 ha zoned Rural Resource

[REDACTED] 10.52ha zoned Rural Resource

[REDACTED] 9.88ha zoned Rural Resource

[REDACTED] 93.79ha Zoned Rural Resource

Vegetation is already protected under the Natural Asset Code.

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

My property has an area of 81.12 ha. My preferred RLZ subcategory I am seeking is

.Rural Living Zone C or Rural Living Zone D with intention of residential use (full time) and development is the primary purpose.

D3.3 Visible rural activity is not required for RLZ

D3.4 Analogy to accepted RLZ localities

The Ireneinc reports has recommended full ELZ to RLZ transitions for several localities within the Channel and Kingston localities Kettering East, Oyster Cove, Howden, Blackmans Bay, Albion Heights and Tinderbox West a mix of residential/rural zones which has the same characteristics very similar /identical coastal, bushland settings same scenic coastal landscape pattern as my property at Gordon yet I am been disadvantaged by the rezoning from ELZ to LCZ. This inconsistency is very unfair and discriminative as I purchased my residential land under ELZ to build a dwelling and reside at Gordon on full time basis. Why is my property been treated differently from the other Channel localities and that my southern adjoining neighbours' (approximately 8 properties) come under Rural.

D4.1 Consistency and Fragmentation Arguments

My property is sandwiched between (mainly surrounded by predominantly) rural farming land with vast pockets of native vegetation on the southern /Eastern sides all zoned Rural and with the back boundary adjoining Environment Management (crown reserve).

The application of LCZ to my property creates a fragmented and isolated pocket of LCZ within the preponderantly rural setting Zone.

D4.2 Inconsistency with adjoining or comparable properties.

The network of neighbouring properties adjacent to mine (11 lots Rural) and within my property locality as listed covers a total area of 218.82ha and all zoned Rural with several pre-existing dwellings. These properties have been zoned Rural and share the same Landscape values, native vegetation cover, current and proposed Council code overlays. There are no identified differences between my neighbours' properties yet my property is been treated individually negatively due to the changes from ELZ to LCZ .Major Negative Impact.

[REDACTED] Gordon

[REDACTED] Gordon

D5 Council's approach has been history inconsistent.

Vegetation is already protected under the Natural Asset Code.

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[REDACTED] Gordon

[REDACTED] Gordon

D5 Council's approach has been history inconsistent.

The Lack of communication and notification associated with the alterations to my property rezoning from ELZ to LCZ the Ireneinc report has been very disappointing.(uninformed). The only information / correspondence I have received was after the 14 Th April 2026 from Tasmanian Planning Commission.

Re Tasmanian Planning Scheme Kingborouh draft Local Provisions Schedule.

DUE to the late information (letter) and short timeframe to respond and prepare a submission I have had no chance to obtain access to any Legal or professional planning advice(potentially disadvantaged.)

D6 Any landscape values present can be managed without LCZ

The current code overlays (KIPS2015) for Environmental and Rural Living applicable to lot [REDACTED] and [REDACTED] Gordon

E1.0 Bushfire-Prone Area Code

E3.0 Landslide Code

E10.0 Biodiversity Code

E11.0 Waterway and coastal Protection Code

E14.0 Scenic Landscape Code

Proposed Code Overlays (TPS) Rural 5370 Channel highway

C7.0 Waterway and coastal Protection Area.

C7.0 Priority Vegetation.

C8.0 Scenic Protection area.

C13 Bushfire-Prone Areas

C15.0 Landslip Hazard

My property can be appropriately managed with the relevant overlay controls especially with the SPA/PVA overlays and the combination of RLZ zoning to maintain the landscape values identified in the locality without the need for LCZ.MY Rural Zoned neighbours 'properties have the same overlays and manage their Landscape values under Rural.

D7 Inconsistency in the Ireneinc Frame Work (Attachment A)

The ireneinc inconsistency analysis per locality re Tinderbox West,Howden and Blackmans Bay,Kettering west(initially LCZ proposed however the TPC intervened.... common sense prevailed and a correction made from LCZ to RLZ)Kettering East and Oyster Cove all these location have been recommended for RLZ.

All these Channel localities that have been zoned for RLZ Kettering East and Oyster Cove zoned ELZ converts to RLZ

Kettering West zoned RLZ but initially LCZ proposed and the TPL has made a correction and now recommended to RLZ. Also in reference to the CROSS LOCALITY ARGUMENT REFERENCE GUIDE #9

625

Councils 85% to 75% reduction history (Ireneinc LCZ review) TPC comments the initial LCZ application inconsistent with the Zone guidelines. Re attached letter Independent Planning Review Accepted shows a reduction in the number of properties to be zoned LCZ from 1631 to 869. I am being forced into a non-living zone and fighting for my land use rights.

Kettering East and Oyster Cove outcome zoned full RLZ where the Southern Channel has been subjected to bulk LCZ yet the characteristics of Kettering East and Oyster Cove should apply for the Southern Channel Region. Evidences to support these inconsistencies to have my property to come in line from ELZ to RLZ as in other and my own localities can be seen from reviewing and comparing the Ireneinc Report Zone Review. My property shares the same or near identical D'Entrecasteaux Channel coast setting, identical landscape value, SPA coverage, priority vegetation area overlay plus several other council overlays all these aspects equates with land protection without the need of LCZ. Same as Kettering west/east and Oyster cove. (NORTH Channel)

I totally disagree and argue against the compulsory Land Conservation Zoning and propose the appropriate zone and request to be reclassified RLZ. As all my private local neighbours are Rural.

According to Glamorgan Spring Bay Council "Local Provision Schedule section 35 F report LCZ 4 The LCZ should not be applied to (a) land where the priority is for residential use and development (see RLZ); or (b) state-reserved land (see EMZ)..... Guideline no.1 very clearly states that residential purposes should be directed to RLZ."

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I purchased My property at Gordon as Residential Environmental Living and my ecosystem diversity meets the same criteria and characteristics as RLZ as in the other Kingborough localities (Kettering West /East and Oyster Cove) and Rural within close proximity .My [REDACTED] Property has a slight elevation, scenic coastal/rural outlook and is situated well below the ridgeline of the surrounding hills. The landscape values are covering of native vegetation with several pockets of cleared land.

Where is the justification with numerous inconsistencies and why should I be penalized and put at an unfair disadvantage with the proposed LCZ?.....plus all the negative impact.

Part E Locality –Specific Context

Locality name Gordon (Channel Region)

The Ireneinc report recommends LCZ bulk with rural activities.LDRZ strip: small coastal residential.

TPC panel comments specific to your locality (from day 20 hearing guide)”At 02.33.54 Commissioner Dan Ford noted that at Kettering West: effectively forced the concession that the priority vegetation area (PVA) overlay does the landscaping-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”

This statement supports my submission please refer to my comments in section .(particularly D7)

Also the 3 other delegate statements would be supportive.

Any Specific landscape value statement for your locality and how it relates to your property.

Please refer to my in section D and re attached property report for [REDACTED] Gordon Tas 7150 dated 01/05/2024.

re:

CR 7

Existing zoning Context for your locality:

The Gordon area includes within my area (#s [REDACTED]) Re the Kingborough Interim Planning Scheme 2015 indicates

11 Rural properties (218.82 ha)

1 Environmental Management Crown Land Conservation Area (325.64 ha) property

4 Environmental Living (84.48ha) properties

Plus my property ELZ 81.12 ha with 5 lots on the title, my property adjoins and is in close proximity to the above properties listed. The EMZ crown Land lies behind and to adjacent side boundaries North and East. The southern, South East and Western boundaries interface with rural farming properties complete with dwellings and sheds.

Gordon's coastal Low density residential zone strip zoned ELZ is nearby.

I am sandwich in between Rural, Environmental Management (Conservation Area) and Environmental Living.(Fragmentation pockets).

Re Cross Locality Argument #8: Fragmentation avoidance applies in all localities (Ireneinc Localities Reports). Direction 69/Ireneinc report Part E.

CR
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However my property has the same current / proposed code overlays and has been recommended to be zoned Landscape conservation.

The property boundaries Behind and adjacent to me [REDACTED] ...325.64 hectares falls under Environmental Management (crown land).

I Submit that the application of the Landscaping 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 Rural Living Zone (RLZ) is the appropriate zone for my property under the draft Kingborough LPS

[REDACTED]

GRANT REYNOLDS

TASMANIAN PLANNING COMMISSION

2 April 2026

Our ref: DOC/26/36829
Officer: Linda Graham
Phone: (03) 6165 6828
Email: KingboroughLPS@planning.tas.gov.au

GRANT MITCHELL REYNOLDS

LOWER SNUG TAS 7054

Tasmanian Planning Scheme Kingborough draft Local Provisions Schedule (LPS)

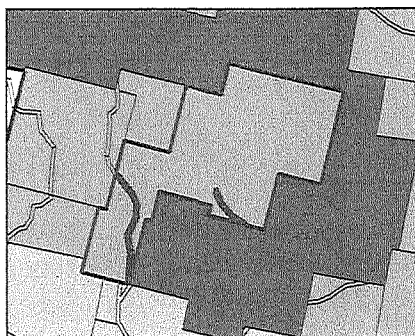
Dear Landowner,

The Tasmanian Planning Commission has received a submission from the Kingborough Planning Authority in the form of a report prepared by Ireneinc. The report was commissioned by the Council and is a review of the zones applied to former Environmental Living Zone land within the exhibited Kingborough draft Local Provisions Schedule (LPS). The review is a response to Direction 69 which was issued by the Commission on 10 October 2025.

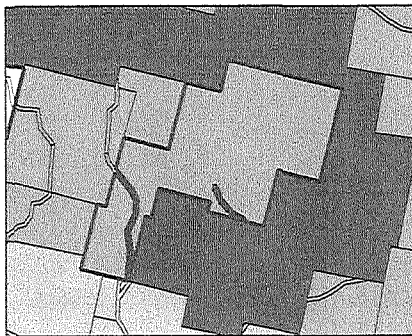
The Ireneinc report can be found on the Commission's website and interactive mapping prepared by Kingborough Council showing the recommendations in the report can be found on the Kingborough Council's website.

Under the draft LPS, your property was exhibited within the Landscape Conservation Zone and is recommended in the Ireneinc report to remain within the Landscape Conservation Zone as shown below.

Title:	Address:	Exhibited:	Proposed:
		Landscape Conservation	Landscape Conservation



Draft LPS zone



Recommended zone in Ireneinc report

Legend:
Landscape Conservation
Rural
Environmental Management



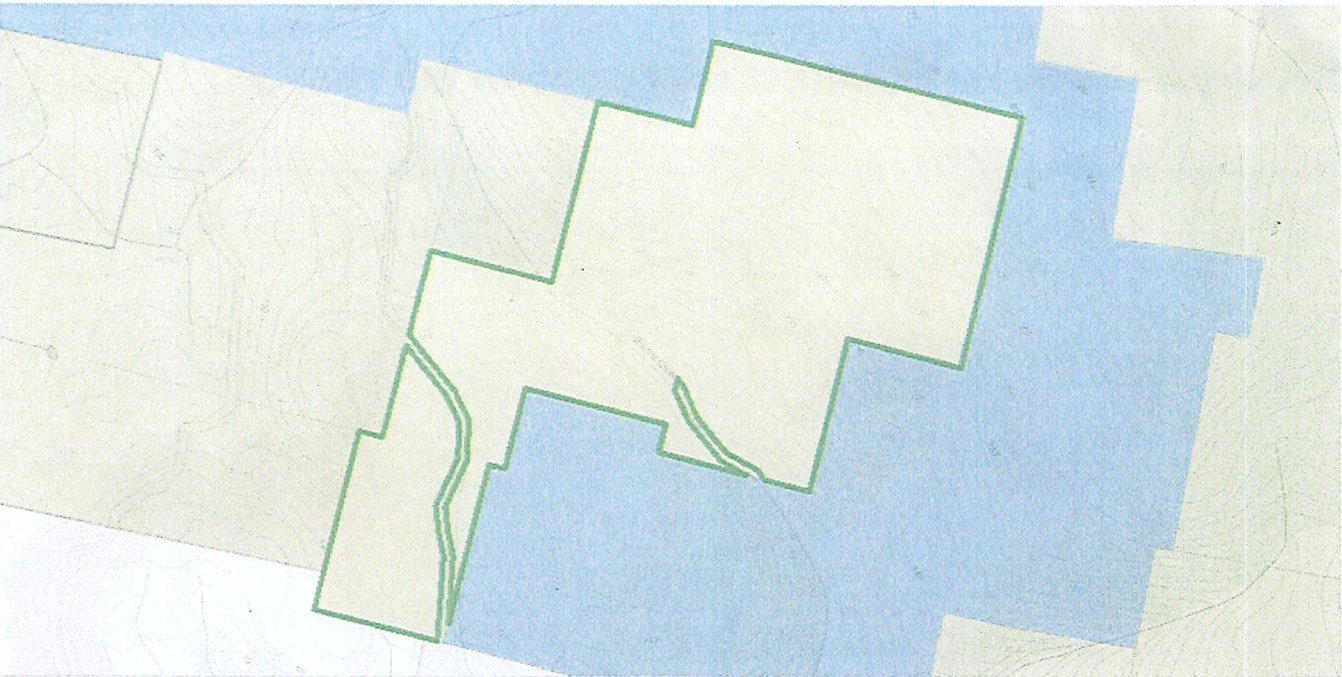
Interim
Planning
Scheme 2015
Zoning

4 other properties:
(84-48 ha)
ELZ
Plus my property
81-12 ha ELZ
165-6 ELZ
218-82 ha
Rural
325.64 ha
Environmental
Management
(Crown land)
Conservation Area

Gordon

Location Information

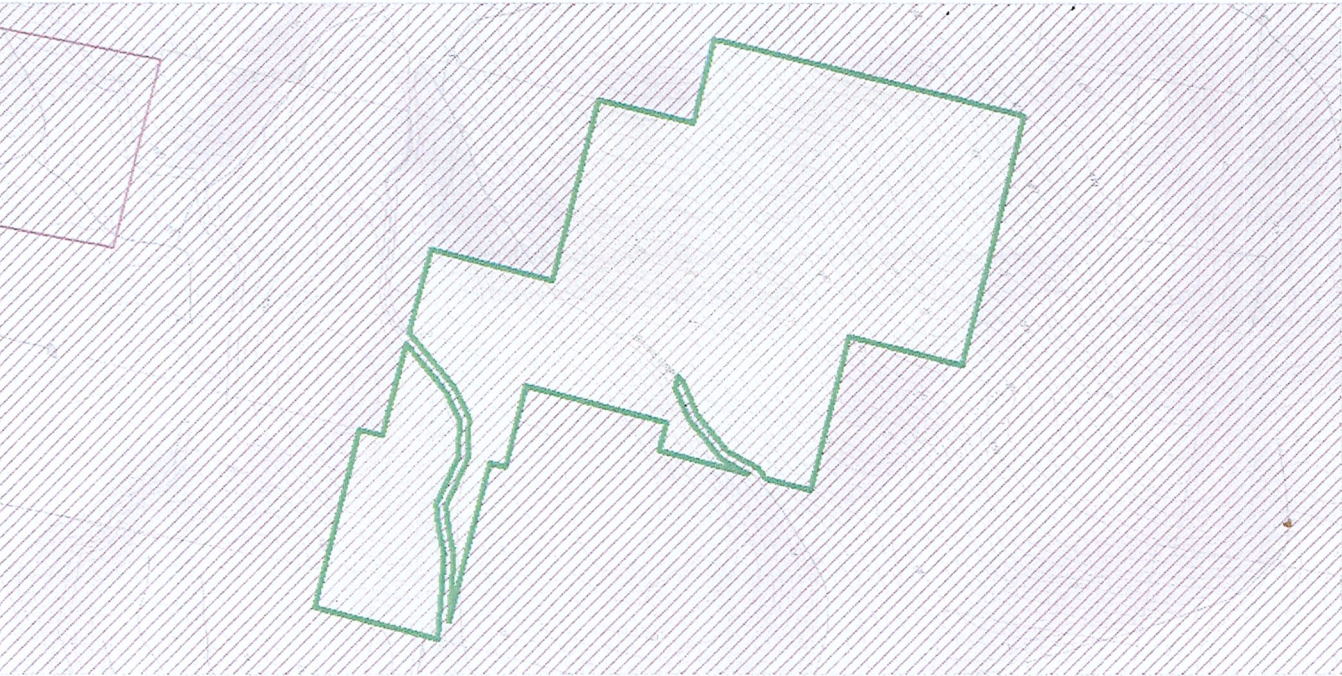
Interim Planning Scheme Zone



Interim Planning Zone

Zone	26.0 Rural Resource
Zone	29.0 Environmental Management
Zone	14.0 Environmental Living

Bushfire-Prone Area

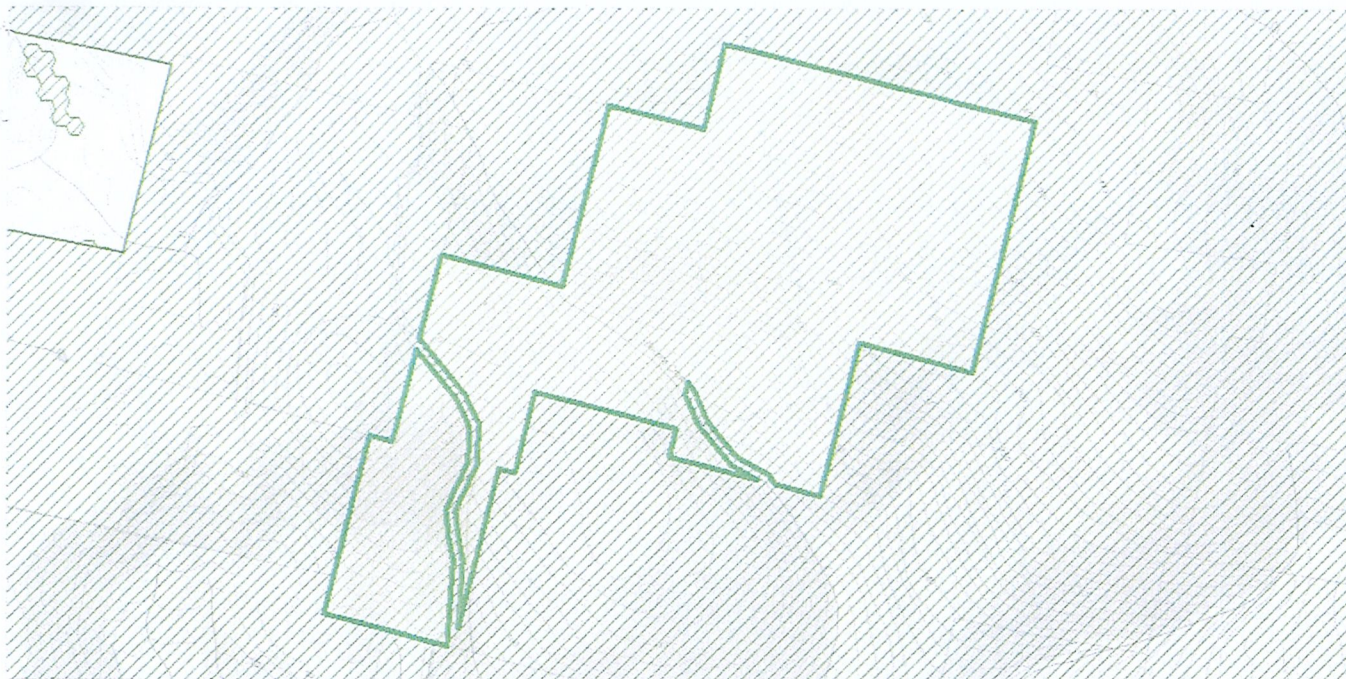


Bushfire Prone Area

The bushfire-prone area overlay applies in accordance with any overlay map approved by the Tasmania Fire Service for the relevant municipal area. The purpose of the bushfire prone code is to ensure that use and development is appropriately designed, located, serviced, and constructed, to reduce the risk to human life and property, and the cost to the community, caused by bushfires.

Overlay Name	Bushfire Prone Areas
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Biodiversity Protection Area



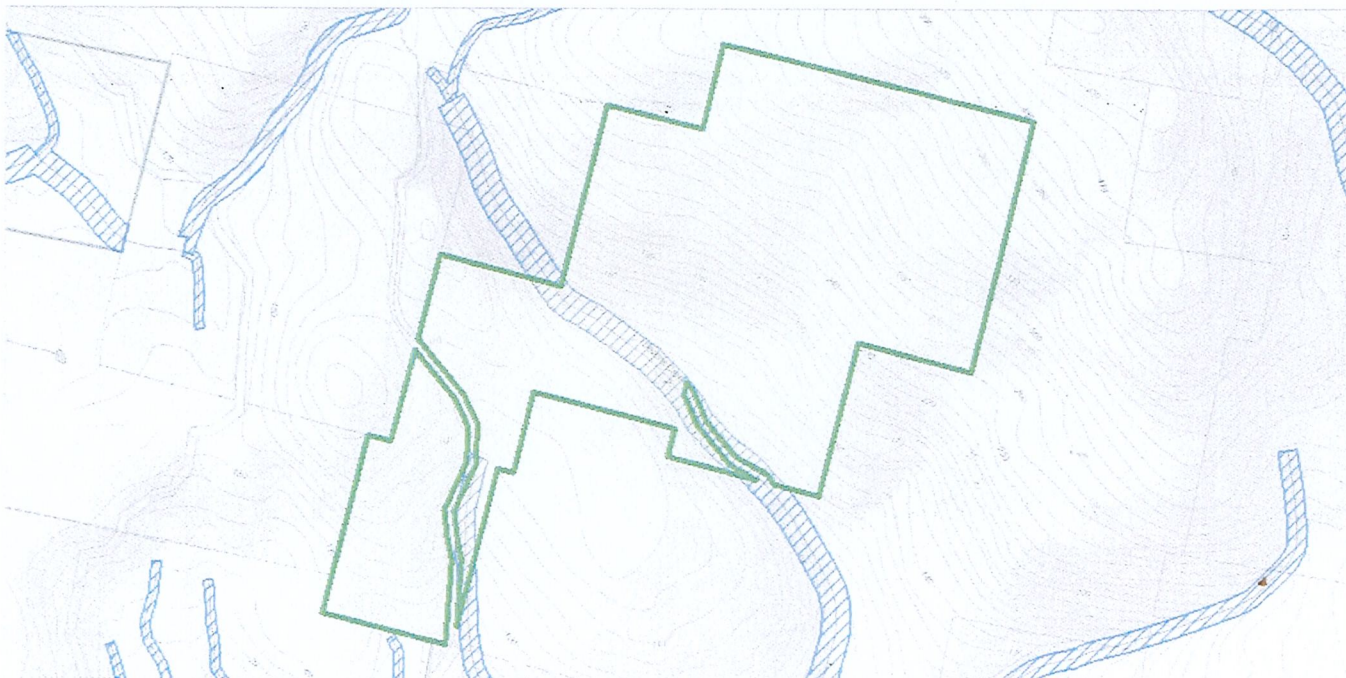
Biodiversity Protection Area

The biodiversity protection area identifies areas of threatened native flora and fauna communities and local biodiversity values.

Overlay Name

Biodiversity Protection Area

Waterway and Coastal Protection Area



Waterway and Coastal Protection Area

The waterway and coastal protection area overlay includes land within a specified buffer distance from Class 1 to 4 watercourses and wetlands, including Ramsar wetlands. Class 1 watercourses include lakes and tidal waters.

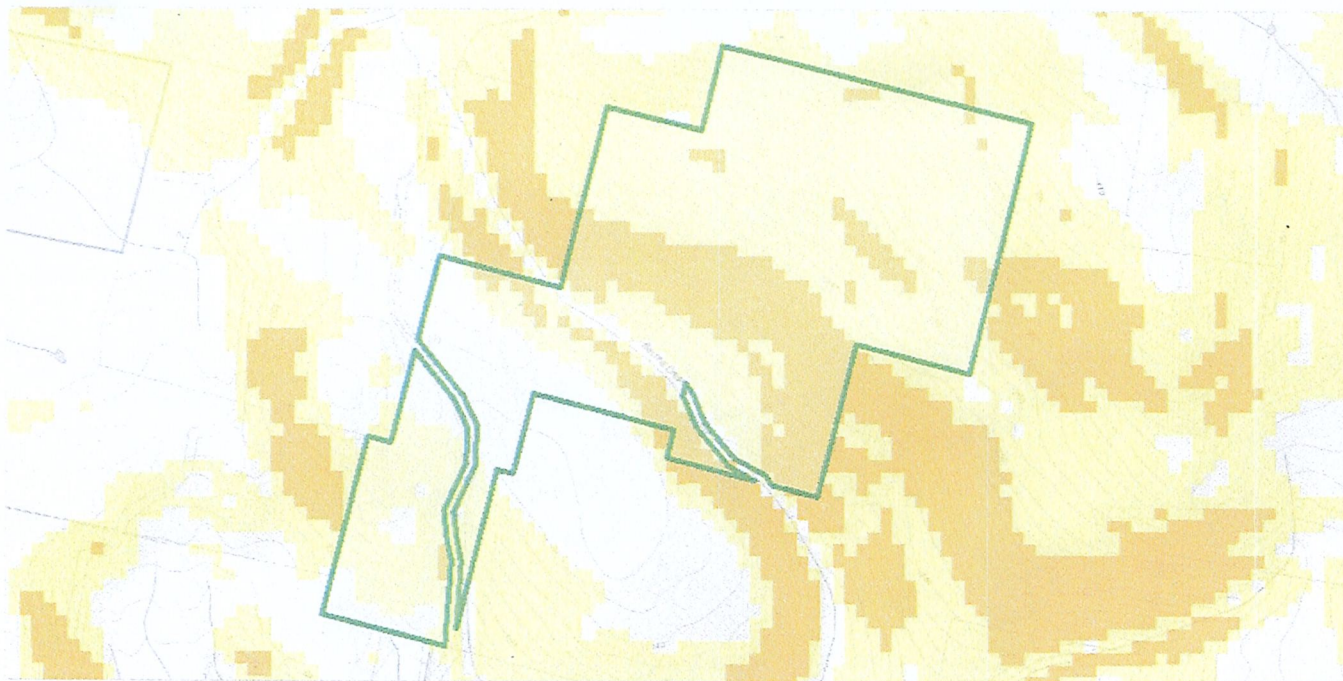
Description

Buffer width 30m

Description

Buffer width 20m

Landslip Hazard

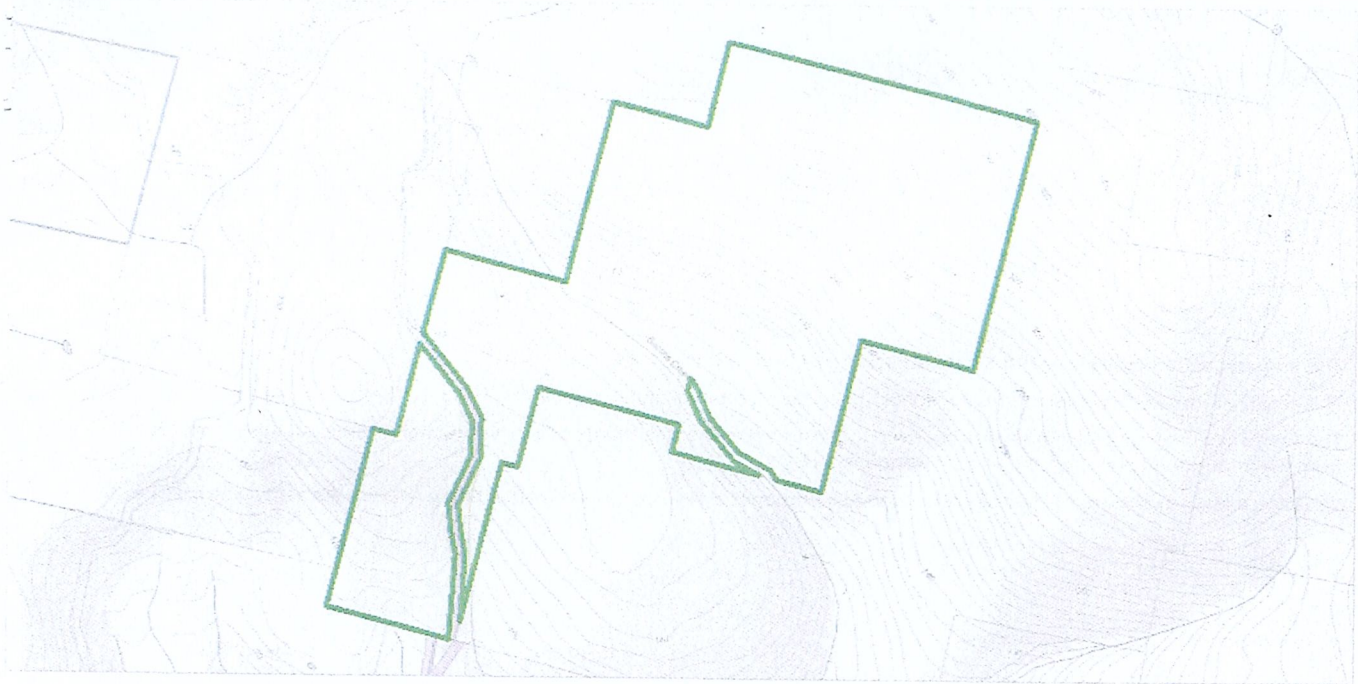


Landslip hazard bands: Colour coding

The coloured areas on the map represent the relevant Landslip Hazard Bands. The Low Risk Hazard Band is yellow, the Medium Risk Hazard Band is orange, the Medium to Active Hazard Band is purple and the High Hazard Band is Red. The presence of a Hazard Code on the property may affect the planning and building approvals required for development.

Hazard Band	Medium
Hazard Exposure	The area has known landslide features, or is within a landslide susceptibility zone, or has legislated controls to limit disturbance of adjacent unstable areas.
Hazard Band	Low
Hazard Exposure	This area has no known active landslides, however it has been identified as being susceptible to landslide by Mineral Resources Tasmania (MRT).

Crown Land



Crown Licences

Crown Licences includes land under a current licence from the Crown within the State of Tasmania. Crown Licences are administered by the Crown Land Services Branch of the Department of Natural Resources and Environment (formerly DPIPWE). Licences are normally renewed annually but access licences may be for a fixed term. Licences do not give exclusive possession of Crown Land.

Licence Type	Licence
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Crown or Council Land



Crown or Council Land on or adjoining the property

Crown Land Authority includes land owned, vested or managed by a Commonwealth, State or Local Government Authority or Government Business Enterprise. Categories include Housing Tasmania, Hydro Tasmania, Councils, Education, Forestry Tasmania, TAS Water and more. This may include properties adjoining land owned by the Crown or the Council.

Tenure Type	Crown Land
Authority Type	Parks and Wildlife Service

Council Details

The local council where your property is located can provide advice on a proposed project.

Consult

Kingborough Council

Mailing address

15 Channel Highway
Kingston Tasmania 7050

Work: (03) 6211 8200

Disclaimer

This enquiry tool is a guide only and is not a substitute for professional advice.

This enquiry tool only provides information for common developments undertaken individually, for example, building a deck.

The Tasmanian Planning Commission, a court, council or other relevant authority may have an interpretation of the law that is different from the information provided as part of this enquiry tool.

You should always confirm that you are permitted to commence a development by contacting a relevant authority who may be:

- the local council; or
 - an independent Licensed Professional
-

Independent Planning Review Accepted

Kingborough Council has accepted an independent review into the application of Landscape Conservation Zones (LCZ) as part of moving to the Tasmanian Planning Scheme which is required as part of State Government planning reforms.

Kingborough Mayor Paula Wriedt said a majority of elected members voted in favour of the review being provided to the Tasmanian Planning Commission as part of Kingborough's draft Local Provisions Schedule (LPS).

"Councillors noted several times that the report was very comprehensive; however, several agreed refinements would be made prior to its submission this week," Cr Wriedt said.

"Council understands this issue has been extremely difficult for some landowners.

"The application of LCZ has caused concerns, and we have listened to this feedback and taken it on board.

"As Mayor, I am sorry people have felt worried and upset about this matter.

"Planning is complex, and we are trying to set a framework which will guide responsible land use in our municipal area.

"As was remarked during the debate, it is a shame the framework developed by our independent consultants as part of the review was not more clearly reflected in the State Government's guidelines about for applying zones under the new scheme right throughout Tasmania.

"This would have ensured greater consistency in application across different municipal areas.

"The review does not remove LCZ zoning from our draft LPS submission.

"However, it has significantly reduced the number of properties proposed to be zoned LCZ from 1631 to 869.

"While we know that some landowners believe we should not have any land zoned as LCZ.

There are legitimate planning reasons why some parts of our municipal area require this zoning to ensure their natural values are retained.

"Councillors amended the staff recommendation to make it clear to the TPC that if two zones could potentially apply to an area under the framework, that Council, acting as the Planning Authority, would prefer that the zone with fewer restrictions be applied."

Mayor Wriedt said the review would now be provided to the Commission, which was continuing to assess Kingborough's draft LPS and conduct hearings.

The Commission has indicated that any landowners whose property's zone has changed through this review will be advised and will be invited to participate in the hearings.

"Ultimately the final decisions on the application of zoning will be made by members of the Tasmanian Planning Commission which is an independent body comprising of members with specific expertise in land use and planning matters."

The submitted independent report will be made available on both Council's and the TPC website.

8:55

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ANNEXURE TO CERTIFICATE OF TITLE

3164 150

REGISTERED NUMBER

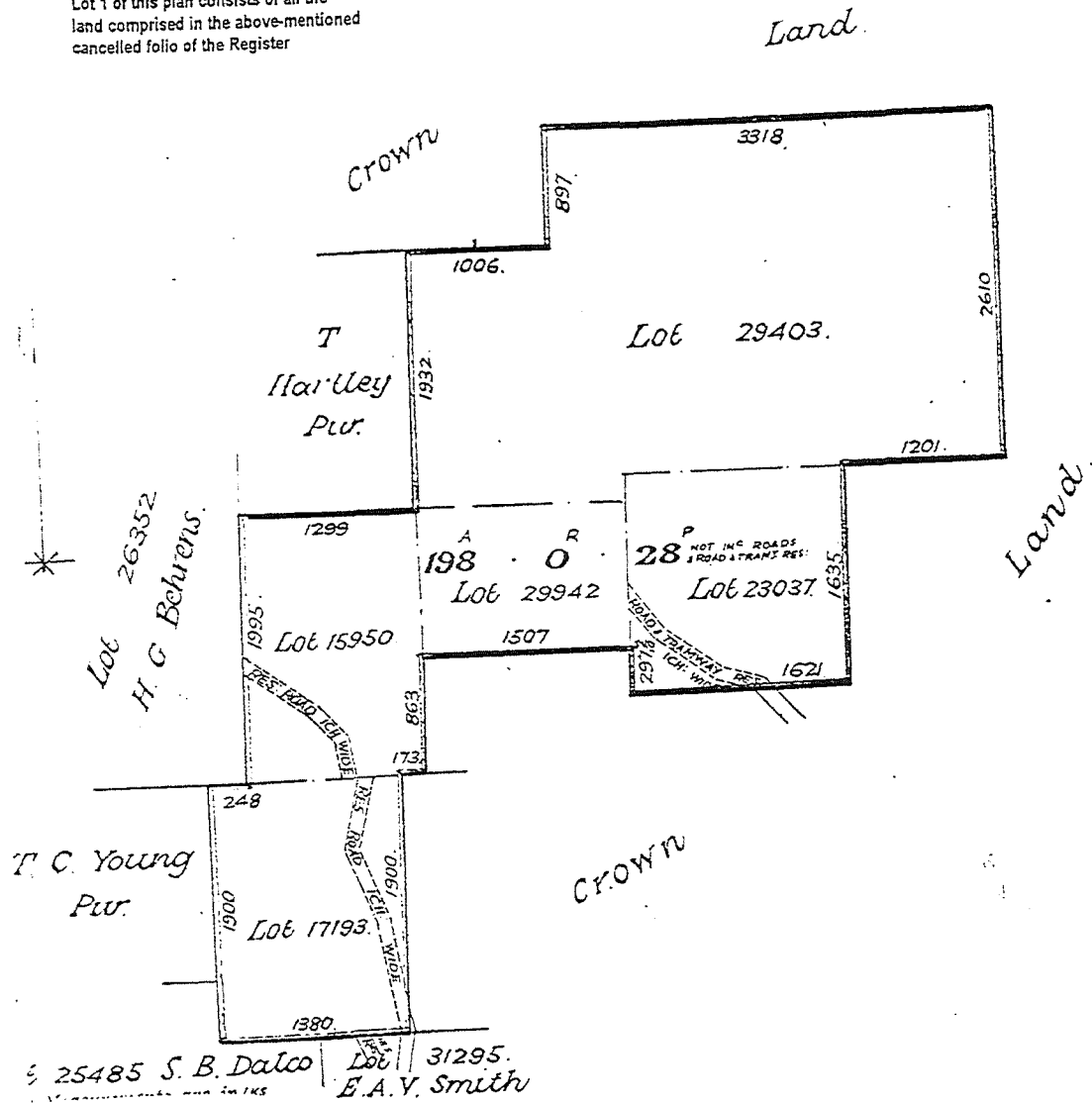
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Recorder of Titles

Recorder of Titles



Lot 1 of this plan consists of all the
land comprised in the above-mentioned
cancelled folio of the Register



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.

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.

WRITTEN SUBMISSION TO THE

TASMANIAN PLANNING COMMISSION

Kingborough Local Provisions Schedule — Direction 69 / Ireneinc Report

TEMPLATE T1

Contesting LCZ Retention
Seeking Rural Living Zone

Use this template if you received:

- Letter 1 — Representor, already heard, LCZ retained
- Letter 3 — Representor, not yet heard, LCZ retained
- Letter 5 — Non-representor who contacted TPC, LCZ retained
- Letter 7 — Non-representor, no prior contact, LCZ retained

⚠ DEADLINE: Submissions must be lodged by midnight Monday 4 May 2026. This deadline is hard and fast (Chair Nick Heath, TPC hearing Day 20). Late submissions cannot be accepted.

IMPORTANT DISCLAIMER: This template is provided for guidance only and represents personal interpretation of the TPC hearing and associated documents. It is NOT professional planning advice. Before lodging your submission you should read the source documents yourself, form your own view, and speak to a qualified planning professional or legal adviser about your specific circumstances. Do not rely on this template alone.

HOW TO USE THIS TEMPLATE

This template is structured in six parts. Work through each part in order:

- Parts A–B: Select your procedural opening (match your letter type) and complete your property details.
- Part C: Review and personalise the statement of position — delete the RLZ subcategory options that do not apply.
- Parts D–E: The arguments are pre-drafted. Work through each argument and insert the evidence specific to your property where indicated by amber boxes.
- Part F: Complete the conclusion and sign.
- Delete all amber instruction boxes and this 'How to Use' section before lodging.
- Lodge by email to KingboroughLPS@planning.tas.gov.au quoting your property title reference.

PART A — PROCEDURAL OPENING (select one variant)

SELECT THE VARIANT BELOW THAT MATCHES THE LETTER YOU RECEIVED. Delete the other three variants before lodging.

VARIANT A1 — USE IF YOU RECEIVED LETTER 1 (REPRESENTOR ALREADY HEARD, LCZ RETAINED)

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 previously made a representation on the draft LPS and that representation has been heard by the Commission. I understand that by this letter the Commission is providing me with the opportunity to make a further written submission specifically in relation to the recommendations contained in the Ireneinc report.

I take up that opportunity and submit as follows.

Title reference (folio)	<i>This appears under 'Title' in your letter from the TPC</i>
Lot size (approx.)	
Locality	<i>e.g. Tinderbox / Howden / Kettering West</i> <i>Ref attached submission</i>
Current IPS zone	<i>Environmental Living Zone (ELZ)</i>
Draft LPS exhibited zone	<i>Landscape Conservation Zone (LCZ)</i>
Ireneinc recommended zone	<i>Landscape Conservation Zone (LCZ) — unchanged</i>
Zone sought in this submission	<i>Rural Living Zone (RLZ) — specify subcategory below</i>

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.

—Select and keep the RLZ subcategory you are seeking — delete the others Choose whichever subcategory best reflects your lot size and existing development pattern

The specific subcategory I seek is:

- ☐ Rural Living Zone A (minimum lot size 1 ha) — reflecting the existing lot pattern in my locality
- ☐ Rural Living Zone B (minimum lot size 2 ha) — reflecting the existing lot pattern in my locality
- ☒ Rural Living Zone C (minimum lot size 5 ha) — reflecting the existing lot pattern in my locality
- ☒ Rural Living Zone D (minimum lot size 10 ha) — appropriate where lot sizes exceed 10 ha and no further subdivision is intended

—Add one sentence explaining why this subcategory reflects the existing pattern e.g. 'The predominant lot size in [locality] is approximately [X] ha, consistent with RLZ [X].'

PART D — GROUNDS FOR THIS SUBMISSION

The arguments below are organised by pillar. Work through each one and personalise the evidence placeholders. Arguments that do not apply to your property may be removed, but retaining more arguments generally strengthens a 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

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.

—Describe the existing residential evidence on your property e.g. 'My property contains an established dwelling, associated outbuildings including [garage/shed], and [garden/cleared areas/fruit trees/fencing]. Aerial photography over a period of [X] years confirms the consistently residential character of the property.'

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.

—Describe the settlement characteristics around your property e.g. 'My property is situated within a cluster of [X] properties along [road name], each with lot sizes ranging from approximately [X] ha to [X] ha. The settlement pattern is consistent and has been established since [year]. Neighbouring properties contain detached dwellings with associated rural activities including [hobby farming / grazing / orchards / etc].'

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].

—Describe the overlays and codes applicable to your property e.g. 'My property [is / is not] within a Scenic Protection Area (SPA). It [is / is not] subject to the NAC / PVA overlay. These overlay controls provide adequate management of any landscape values present, without the need for the more restrictive LCZ.'

—State whether any landscape values are actually present on your title e.g. 'The property is predominantly [cleared / cultivated / developed]. There is [no / limited] native vegetation on the title. The landscape values identified in the Ireneinc locality baseline relate to [describe] which is located [distance/direction] from my property 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 [A/B/C/D] 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.

—Confirm that your preferred RLZ subcategory does not enable further subdivision e.g. 'My property has an area of [X] ha. Under RLZ [D], the minimum lot size is 10 ha (with an 8 ha performance criteria). Subdivision of my property under this subcategory would [not be possible / be significantly constrained], addressing any concern about intensification.'

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.

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.

—List the specific overlay controls that apply to your property e.g. '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.'

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.

—Identify the specific comparison in Attachment A most relevant to your property e.g. 'As documented in Attachment A — [your locality] section, the comparison with [similar locality] shows that Ireneinc applied near-identical landscape value descriptions and settlement findings to both localities yet recommended [LCZ] for [your locality] and [RLZ] for [similar locality]. The sole differentiator cited — [state it] — does not apply to my individual property because [specific reason].'

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

Acronym/Term	Meaning
ELZ	Environmental Living Zone
Ireneinc report	Review of the LCZ Kingborough (Review of the Methodology and Zone Application and Locality Baseline and Alternative Zone Evaluation)
LCZ	Landscape Conservation Zone
LPS	Draft Kingborough Local Provisions Schedule
LUPAA	Land Use Planning and Approvals Act 1993
NAC	Natural Assets Code
PVA	Priority Vegetation Area
RLZ	Rural Living Zone
SAP	Specific Area Plan
SPA	Scenic Protection Area
SPC	Scenic Protection Code
STRLUS	Southern Tasmania Regional Land Use Strategy
TPC	Tasmanian Planning Commission
Zone Guidelines	Guideline No. 1 — Local Provisions Schedule: Zone and Code Application

ATTACHMENT A

Inconsistency Analysis — Ireneinc Zone Evaluation

⚠ DEADLINE: Submissions must be lodged by midnight Monday 4 May 2026. Complete, sign and attach this cover note as the first page of Attachment A to your submission. Delete all amber instruction boxes before attaching.

IMPORTANT DISCLAIMER: This analysis has been prepared to support a written submission to the Tasmanian Planning Commission. It represents a personal analysis of publicly available Ireneinc reports and hearing records and is NOT professional planning advice. All references to Ireneinc locality reports and hearing transcripts should be verified against the primary source documents before being relied upon. The primary documents — Ireneinc Locality Baseline and Alternative Zone Evaluation, the Ireneinc LCZ Review and Findings Report, and the Day 20 TPC hearing transcript — are publicly available on the Commission's website and Kingborough Council's website.

PART 1 — SUBMISSION IDENTIFICATION

—Complete the table below with your submission details

Submission reference	GRANT MITCHELL REYNOLDS	Gordon
Property title reference	This appears under 'Title' in your letter from the TPC	
Locality	e.g. Tinderbox / Kettering East / Howden ...	Gordon
Submission template used	e.g. Template T1 — Contest LCZ, seek RLZ Template T1 - contest LCZ seek RLZ	
Date of attachment preparation	4/5/26	

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:

→List 2–4 specific property characteristics that align with the comparable RLZ locality and differ from any reason cited by Ireneinc for LCZ in your locality e.g. '1. My lot is 3.2 ha — consistent with the 1–5 ha range accepted for RLZ at Howden, and within the range for which Ireneinc found codes manage landscape values adequately. 2. My lot is predominantly cleared with an existing dwelling — it does not display the elevated vegetated ridgeline character cited as the basis for LCZ retention. 3. Priority Vegetation Area overlay applies to my lot — consistent with Kettering West Groombridges where the TPC found PVA does the landscape-protection work.'

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.

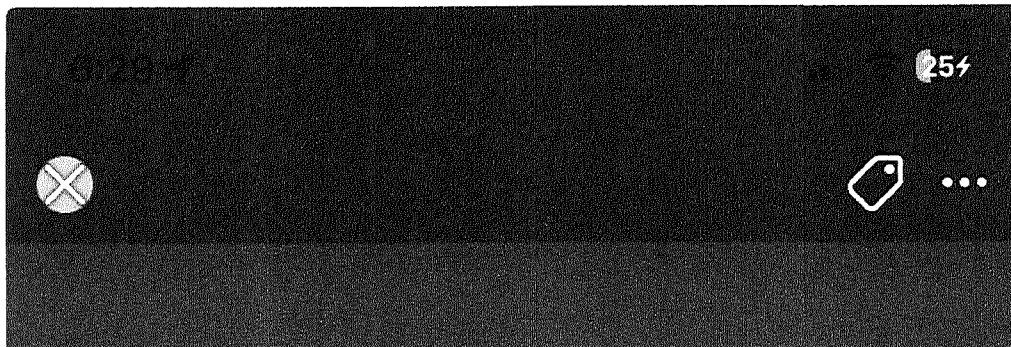
PART 7 — DECLARATION

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 authorised representative of the property identified in Part 1 above.

Signed: 	Date: 4 5 26
<u>GRANT REYNOLDS</u>	
Full name:	Contact email / phone:

LODGEMENT: Email your completed submission and Attachment A to KingboroughLPS@planning.tas.gov.au with the subject line: 'Submission — Kingborough LPS Direction 69 — [your property address]'. The deadline is midnight Monday 4 May 2026. Attach only the locality section of the Inconsistency Analysis that is relevant to your property — not all 20 sections.



Local Provision Schedule Section 35F Report



Representations that seek such changes, regardless of extent, cannot be considered without revoking the transitional status of these provisions. This entails Council justifying the provisions as if they do not exist and involves significant risk that the same or similar provisions may not be approved as part of the LPS. This process would create significant risk for the Council and the affected property owners.

Absent a significant change in policy position by the Council, the reality is that changes cannot be made to the transitional provisions.

Representations 33 is the exception to this, because the matters under discussion relate to the translation of existing provisions to a different type of control under the SPP and LPS structure. This issue will require further examination through the hearings to confirm that the transitional status will not be revoked as a result.

Landscape Conservation zoning and Conservation Covenants

Reps 1, 2, 6, 7, 11, 18, 45, 48, 53, 55, 56

Many representations have demanded the landscape conservation zone as they have conservation covenants over their property. It is understood that these submissions have been encouraged by Conservation Landholders Tasmania, based on the Commission's Guideline number 1.

Discussions with the Tasmanian Land Conservancy provided further clarity for the representations regarding this issue. Landscape Conservation zoning is preferred for conservation covenanted land because it provides for the assessment of vegetation removal and does not allow for extractive industries.

The Guideline statements are inconsistent with the zone provisions, which also lack clear guidance about application of priority vegetation and scenic management overlays within the zone. The requests are consistent with guidelines LCZ 1, 2 and 3.

The landscape conservation zone cannot regulate biodiversity, which is done through the Priority Vegetation overlay and Natural Assets Code. Guideline LCZ 4(a) provides the following:

LCZ 4 The Landscape Conservation Zone should not be applied to:

- (a) land where the priority is for residential use and development (see Rural Living Zone); or*
- (b) State-reserved land (see Environmental Management Zone).*

Note: The Landscape Conservation Zone is not a replacement zone for the Environmental Living Zone in interim planning schemes. There are key policy differences between the two zones. 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.¹

While it is not a planning issue, there is a risk to the property owners that the requested change to the Landscape Conservation zone may affect financing for properties. Guideline No. 1 very clearly states that residential purposes should be directed to the Rural Living zone.

¹ P20 Guideline 1

No compulsory Landscape Conservation Zoni...

Jamie King · 29 Sep 2025 ·

Useful information?

