
From: [REDACTED]
Sent: Sunday, 3 May 2026 9:15 PM
To: Kingborough LPS; [REDACTED]
Subject: Submission — Kingborough LPS Direction 69 — Title [REDACTED]
Snug
Attachments: 8ha title - To the Tasmanian Planning Commission.docx; Attachment_A.docx

Hello,
Please see the attached documents for consideration, thank you for the opportunity to provide a submission.

Please note, I am not the property owner (John Wolf) however I am the power of attorney and can provide the documents supporting this if required. John Wolf is my father, and I live at the above property with him.

Kind regards
Sally Wolf
[REDACTED]

28/04/2026

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 be split between the Landscape Conservation Zone (LCZ) and the Rural Zone (RZ) under the draft Kingborough Local Provisions Schedule (LPS).

I did not make a formal representation during the public exhibition period and have not previously had correspondence with the Commission. I understand this letter has been sent to ensure I have a fair opportunity to participate. I take up that opportunity and submit as follows.

Landowner name(s)	John Wolf
Property address	██████████ Snug
Title reference (folio)	██████████
Total lot size (approx.)	8 ha
Locality	Snug
Current zone (IPS)	Environmental Living + Rural Resource
Ireneinc recommended zones	Split: Landscape Conservation Zone (LCZ) + RZ
Split boundary description	The LCZ applies to the northern vegetated portion (approx. 4 ha). The RZ applies to the southern vegetated portion (approx. 4 ha). Both lots are similar in vegetation and landscape, they are connected by a narrow section (laneway type portion between 2 square shaped larger sections) 
Approx. area in LCZ	4 ha — northern vegetated portion
Approx. area in RZ	4 ha — southern vegetated portion
Zone sought in this submission	Full Rural Living Zone (RLZ) across the entire property — specify subcategory below

I do not accept either zone recommended for my property. The split between LCZ and RZ does not appropriately reflect the character or lawful use of my land. I submit that the Rural Living Zone (RLZ) is the correct zone for my entire property under section 34 of the Land Use Planning and Approvals Act 1993 (LUPAA), the Section 8A Guideline No. 1 — LPS Zone and Code Application (the Zone Guidelines), and the Southern Tasmania Regional Land Use Strategy (STRLUS).

I make this submission on the grounds that apply to the whole property:

1. The LCZ portion: The LCZ is not appropriate for the portion of my property recommended for LCZ. The landscape values on that portion, to the extent they exist, can be adequately managed through the Natural Assets Code (NAC), the Priority Vegetation Area (PVA) overlay, the Scenic Protection Code (SPC), and the minimum lot size of the RLZ. LCZ is not required.

I request that the Commission determine that the RLZ applies to my entire property under the draft Kingborough LPS.

The RLZ subcategory I seek is:

- Rural Living Zone C (minimum lot size 5 ha)

The boundary Ireneinc has drawn between LCZ and Rural Zone on my property does not correspond to any visible feature on the ground. The vegetation on the so-called LCZ portion is the same as the vegetation on the Rural Zone portion. The land is uniformly vegetated. There is no ridgeline, creek, fence line, or change in vegetation density at the point where the split boundary falls.

The Ireneinc evaluation framework requires LCZ to be applied only where the landscape values are so significant that no other zone or code can adequately manage them. Where the LCZ portion of my property has the same or substantially similar characteristics to the RZ portion — the same lot pattern, the same land use history, the same code coverage — there is no basis for treating it differently. The LCZ portion (northern 4 ha) is un-cleared bushland that has not been developed in any way in the same way as the Rural Zone portion (southern 4 ha). Both portions are vegetated with a similar density of native trees. The Ireneinc Locality Report does not identify any specific landscape feature on the LCZ portion that is not also present on the Rural Zone portion.

Other properties in my locality with similar physical characteristics — a mix of cleared settled land and native vegetation — have been recommended for full Rural Living Zone without a split. Where those properties share the same combination of features as my whole title, there is no reason my property should be split while theirs is not.

The properties at [REDACTED] which are adjacent (we share boundaries) to mine and have a similar mix of cleared residential land and native vegetation on the upper portion, were recommended for full RLZ. My property is not materially different from that property. There is no documented reason in the Ireneinc report for the different treatment.

Kate Heckelmann (Ireneinc) confirmed at Day 20 [05:53:00] that the evaluation framework is a tool, not a statutory instrument. The Commission must assess my property against the Zone Guidelines. Where the Zone Guidelines support RLZ for the whole property — because the residential character is established, the lot size prevents subdivision, and existing codes manage landscape values — a split outcome is not required by the Zone Guidelines, even if Ireneinc has recommended one.

The Ireneinc LCZ Review report itself acknowledges that split zoning is a last resort, used only where one part of a title clearly meets LCZ criteria and the other clearly does not. That is not the case here — as set out above, neither portion of my property meets the criteria for LCZ or RZ over RLZ.

A formal comparison of the Ireneinc evaluation across localities is attached to this submission as Attachment A. That document identifies localities where properties with similar characteristics to mine — including a mix of cleared residential land and vegetated upper portions — were recommended for full Rural Living Zone without a split.

As shown in Attachment A — locality section, properties with a similar combination of cleared residential land and native vegetation were recommended for full RLZ D with no split. The landscape value descriptions for those properties are near-identical to the descriptions for my locality. There is no documented reason in the Ireneinc report for treating my property as a split when those properties received full RLZ.'

I request that the Commission have regard to Attachment A, and in particular the comparison rows identified above, which show that the split zone recommendation for my property is inconsistent with the outcome applied to similar properties elsewhere in the municipality.

Locality name – Kettering and Snug

What Ireneinc said about this locality Mixed outcome. Snug Tiers Road residential cluster → RLZ. Old Station Road / former PPZ footprint → Rural Zone (existing rural activities). LCZ retained for balance of locality. Four coastal parcels were 'parked' (not decided) due to complexity of coastal interface issues.

The Priority Vegetation Area overlay does apply, consistent with Kettering West Groombridges where the TPC found PVA does the landscape-protection work.'

For the reasons set out above, I submit that:

The split zone recommendation — LCZ for part of my property and RZ for the remainder — does not correctly reflect the character, use, or zone guideline criteria applicable to either portion of my land.

Rural Living Zone C is the correct zone for my entire property. Under this subcategory, the minimum lot size is 5ha, which significantly limits the possibility of further subdivision, directly addressing any concern about intensification of landscape values on the vegetated portion.

I respectfully request that the Commission:

- Apply the Rural Living Zone C to my entire property (folio of the Register [REDACTED]) in the Kingborough Local Provisions Schedule; and
- Not apply a split zone recommendation across this title, as neither portion of the property meets the criteria for LCZ or RZ over RLZ under the Zone Guidelines.
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Signed: [REDACTED] Full name: Sally Wolf, as power of attorney for the landowner, John Wolf	Date: 28/4/2026 _____ Contact email / phone: [REDACTED]
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ATTACHMENT A

Inconsistency Analysis — Ireneinc Zone Evaluation

PART 1 — SUBMISSION IDENTIFICATION

Submission reference	Sally Wolf [REDACTED] Snug — Direction 69 Land owner — John Wolf
Property title reference	[REDACTED]
Locality	Kettering and Snug
Submission template used	Template TS1 — Contest LCZ, seek RLZ
Date of attachment preparation	28/04/2026

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:

Speaker and timestamp	Statement and relevance
Delegate Rohan Probert [01:07:48]	Comparing Tinderbox East (LCZ) with Howden (RLZ): 'They are very similar if you only look at the description of the landscape values... one we say they can be managed and the other one we say they can't be managed. What we really need to say is the difference between those two.' This statement acknowledges that the Ireneinc framework produced inconsistent outcomes from very similar evidence, and that the difference between localities needs to be clearly explained. This analysis does exactly that for this locality.
Delegate Dan Ford [02:33:54]	At Kettering West: effectively forced the concession that the Priority Vegetation Area (PVA) overlay does the landscape-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.
Kate Heckelmann (Ireneinc) [05:53:00]	Conceded that the evaluation framework is a tool, not a legal requirement. Submissions can move away from it if supported by good evidence. This confirms that identifying inconsistencies in the framework's application — as this analysis does — is a legitimate basis for a submission.
Chair Nick Heath [06:45:48]	Confirmed that the Commission will decide on the basis of section 34 LUPAA criteria (Zone Guidelines and LPS criteria), not on the basis of Council's position or the Ireneinc framework alone. The Zone Guidelines require consistent application of zone criteria — inconsistency of the kind documented in this attachment is therefore directly relevant to the Commission's assessment under the law.

PART 4 — MOST RELEVANT COMPARISONS FOR THIS SUBMISSION

The following table identifies the specific comparisons within the attached Inconsistency Analysis that are most directly relevant to this submission. The full comparative tables for this locality appear in the pages that follow.

Characteristic compared	Similar locality cited in Attachment A	Why this comparison supports my submission
Both sections of the parcel are identical and have the same characteristic of the larger properties surrounding this parcel	Snug falls Rd Powers Rd The remaining hectares that form part of the address to 2274 Channel Highway Snug	No clear reason why the title has been split between LCZ and RZ when surrounds are RLZ
<i>— Add further rows as needed</i>		

PART 5 — PROPERTY-SPECIFIC DIFFERENTIATION

This attachment identifies inconsistencies at the locality level. The submission itself provides the property-specific evidence explaining why those inconsistencies apply to this individual property. In summary, the following characteristics of this property are consistent with the similar localities that received RLZ, and are not consistent with the reasons cited by Ireneinc for LCZ retention:

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:



Full name: Sally Wolf

Date:

28/04/2026

Contact email / phone:



To the Tasmanian Planning Commission,

I write in response to a letter dated 2 April 2026 (ref: DOC/26/36829) advising that the Ireneinc report recommends a different title on my property be included within the Rural Zone (RZ) under the draft Kingborough Local Provisions Schedule (LPS), rather than remaining in the Rural Living Zone (RLZ) as exhibited. This letter refers to the main title of the property at the same address, this property I understand is to be changed from RLZ to RZ.

I did not make a formal representation during the public exhibition period and have not previously had correspondence with the Commission. I understand that this letter has been sent to ensure procedural fairness and provides me with a clear opportunity to formally participate in this stage of the process. I take up that opportunity and submit as follows.

Landowner name(s)	John Wolf
Property address	██████████ Snug 7054
Title reference (folio)	██████████
Lot size (approx.)	120 ha
Locality	Kettering – Snug
Current IPS zone	Rural Resource
Draft LPS exhibited zone	Rural Zone
Ireneinc recommended zone	Rural Zone
Zone sought in this submission	Rural Living Zone (RLZ)

I do not consider the Rural Zone (RZ) to be the most appropriate outcome. I submit that the Rural Living Zone (RLZ) better reflects the existing use, settlement character, and residential intention of my land, and is more 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), and the Southern Tasmania Regional Land Use Strategy (STRLUS).

I request that the Commission determine that the RLZ is the appropriate zone for my property under the draft Kingborough LPS.

- Rural Living Zone D (minimum lot size 10 ha) — appropriate where lot sizes exceed 10 ha and no further subdivision is intended

The RZ purpose is directed at land in non-urban areas where agricultural use is limited or marginal and where the primary function is rural rather than residential. The RZ does not give priority to residential amenity and treats dwellings as a discretionary use that must demonstrate compatibility with surrounding rural activities.

Zone Guideline RLZ 1(a) provides that the RLZ should be applied to residential areas with larger lots where the existing and intended use is a mix between residential and lower-order rural activities, with priority given to the protection of residential amenity. This is a precise description of my property. Zone Guideline RLZ 2(b) further confirms that the RLZ may be applied to ELZ land where the primary strategic intention is for residential use and development within a rural setting, my property is used primarily as a residence. There are also hobby animals a workshop. This mix of residential use with lower-order rural activities is precisely what RLZ 1(a) describes.

The Ireneinc evaluation framework identifies specific suitability indicators for RLZ, including: evidence of residential use; a settlement pattern of 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. My property and the surrounding settlement satisfy these indicators, which is why RLZ — not RZ — is the appropriate outcome.

The Ireneinc report applies RZ in some localities primarily to avoid fragmented LCZ application and to reflect the Rural Resource Zone under the KIPS2015 — not because the land lacks residential character. The modifications table in the Ireneinc Locality Report confirms that RZ was considered 'another alternative in place of RLZ' in some instances, not necessarily the preferred outcome where residential character exists. Where my property has residential characteristics, RLZ is more appropriate than RZ even where Ireneinc defaulted to RZ for administrative consistency reasons. The Ireneinc report applied RZ to my property primarily because it was previously zoned Rural Resource. These reasons do not override the residential character of my specific property, which clearly satisfies the RLZ criteria.

The Ireneinc modifications consistently note that 'RZ should be considered as another alternative in place of RLZ, potentially as being more suitable than LCZ in some instances.' This framing makes clear that RZ is a fallback — not a preference over RLZ — where residential settlement characteristics do not clearly establish RLZ. Where those characteristics are present, as on my property, RLZ is the preferred outcome.

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 must assess my property against the Zone Guidelines, not the Ireneinc framework alone. Where the framework defaults to RZ but the Zone Guidelines support RLZ, the Zone Guidelines prevail.

The Ireneinc report and the Zone Guidelines both identify the risk that RLZ could enable further subdivision that might adversely affect landscape values. However, this risk is addressed by selecting the appropriate RLZ subcategory. Zone Guideline RLZ 2(b) specifically contemplates applying RLZ D (minimum 10 ha) to ensure no further subdivision occurs where lot sizes are large. Similarly, RLZ C (minimum 5 ha) or B (minimum 2 ha) can limit subdivision where current lots are in that range. Furthermore, where landscape values exist in the broader locality, they can be appropriately managed through the Natural Assets Code (NAC), the Priority Vegetation Area (PVA) overlay, and the Scenic Protection Code (SPC). Ireneinc's position was that landscape values can be managed through overlays. The Commission has not yet determined this matter. [02:33:54], finding that overlay controls do the landscape-protection work, not the zone itself.

My property is within a Scenic Protection Area (SPA) and Priority Vegetation area. The NAC/PVA does apply. These controls, combined with the RLZ minimum lot size, provide sufficient protection of any landscape values without requiring RZ.

Applying RZ rather than RLZ to a property with clear residential settlement characteristics creates an inconsistency with comparable properties in the municipality that have been recommended for or confirmed in RLZ. Where neighbouring or nearby properties with substantially similar characteristics — lot size, existing dwelling, rural setting — have been recommended for RLZ, there is no principled basis for treating my property differently.

For the reasons set out above, I submit that:

1. The RZ does not adequately recognise the established residential character of my property.
2. My property satisfies the criteria for RLZ under Zone Guidelines RLZ 1(a) and RLZ 2(b): it is a residential property with larger lots in a rural setting, with a mix of residential and lower-order rural activities, and the primary strategic intention is residential.

3. The appropriate RLZ subcategory for my property is RLZ D, which reflects the existing lot size and settlement pattern and does not create a pathway for further subdivision.
4. Any landscape values in the broader locality can be appropriately managed through existing overlay controls — NAC, PVA overlay, and SPC — in combination with the lot size controls of the RLZ subcategory, without requiring RZ.

I respectfully request that the Commission:

- Determine that the draft Kingborough LPS should be modified to include my property within the RLZ D; and
- If the Commission proposes any alternative outcome, that I be provided with an opportunity to respond before any final determination is made.

I request that the folio of the Register [REDACTED] at [REDACTED] Snug, locality Kettering Snug, be included within the Rural Living Zone D in the Kingborough Local Provisions Schedule.

Signed: [REDACTED] _____ Full name: Sally Wolf, as power of attorney for the landowner, John Wolf	Date: 01/05/2026 _____ Contact email / phone: [REDACTED]
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