
From: Graeme Johnson [REDACTED]
Sent: Thursday, 30 April 2026 7:41 AM
To: Kingborough LPS
Subject: Submission to Ireneinc report Title [REDACTED]
Attachments: Graeme Johnson objection to LCZ.pdf

Dear sirs,

Please see attached submission.

Regards,
Graeme Johnson

Submission to the recommendations made in the Ireneinc report

Landowner: Graeme Johnson
Address: [REDACTED] Tinderbox 7054
Title reference: [REDACTED]
Lot size (approx.): 2.5ha
Current IPS zone: Environmental Living Zone (ELC)
Draft LPS exhibited zone: Landscape Conservation Zone (LCZ)
Ireneinc recommended zone: Landscape Conservation Zone (LCZ)
Zone sought in this submission: Rural Living Zone (RLZ)

Preamble:

The eastern side of Tinderbox Peninsular comprises a continuous strip of approx. 150 lots currently zoned ELZ and proposed to become LCZ. My property is one of them.

My objections to the proposed LCZ equally applies to them all.

Objection 1 **By Lot Size**

LCZ specifies a minimum lot size of 50ha. Not a single lot in this strip approaches 50ha. 90% of those lots are less than 5ha.

ELC minimum is 10ha; RLZ minimum is 1~10ha.

LCZ is an inappropriate choice.

RLZ is the nearest fit.

Objection 2 By Historical Use

Over the past 50 years this area has been subdivided and developed as hobby farm sized residential lots. Many of these lots can be identified as hobby farms – Mine has a vineyard, others have cattle, sheep, goats, bees etc.

RLZ is the appropriate choice.

Objection 3 By Zone Definition

LUPAA states that the new zone should be closest match to the current zone.

The zone purpose statements (ref Ireneinc report Appendix A) are as follows:

ELZ primarily residential; landscape values secondary consideration.

RLZ primarily residential; landscape values secondary consideration.

LCZ primarily landscape values; residential secondary consideration.

RLZ is the best fit.

Objection 4 By Least Restrictive Change

LUPAA states that if a choice becomes between two zones, “the least restrictive” should apply.

In LCZ the discretionary nature of all new residential developments is the major detrimental factor possible over the current ELZ.

RLZ is the least restrictive choice.

Objection 5 By Fairness

According to real estate sites, the median property value in Tinderbox is \$1.5m

The “discretionary residential” restriction in LCZ will create uncertainty in the minds of buys and lenders. They will apply a risk factor to their valuations, making many properties unsellable.

LCZ is clearly unfair to current landholders.

Objection 6 Flawed Decision Tree in the Ireneinc Report

The final decision in the Ireneinc report that is the deciding factor on all these properties as to whether RLZ or CLZ should apply is “could those landscape values be appropriately managed outside of LCZ?”.

Yes = RLZ

No = LCZ

Neither the landscape value in question is defined, nor is the risk factor to that value.

How can a management plan be assessed against a non-existent risk to a non-existent landscape value?

It can't, therefore RLZ is the correct choice.

Objection 7

Ireneinc Author's Doubts

In her presentation of the report to Kingborough council, Kate Heckelmann expressed doubts that LCZ was the correct choice for this area ie the east side of Tinderbox Peninsular.

The only other option is RLZ.

Signed:

A black rectangular box redacting the signature of Graeme Johnson.

Graeme Johnson

Date: 30/04/2026

email:

A black rectangular box redacting the email address.

Phone:

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