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**Sent:** Tue, 24 May 2022 09:24:26 +1000  
**To:** hvc@huonvalley.tas.gov.au;cruickedd@netspace.net.au  
**Subject:** Planning Representation - Jonathan Cruickshank & Monica Wedd - {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.

<b>I/We (name)</b>
Jonathan Cruickshank & Monica Wedd
<b>Are you lodging as a Individual, Company or Organisation</b>
Individual/s
<b>Of Address</b>
3475 South Arm Road
<b>Town or Suburb</b>
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<b>Postcode</b>
7022
<b>Email</b>
<a href="mailto:cruickedd@netspace.net.au">cruickedd@netspace.net.au</a>
<b>Phone Number</b>
0400160103
<b>File</b>
<ul style="list-style-type: none"><li>• <a href="#">100-Turners-Road-Cradoc-Representation-Draft-LPS.pdf</a></li></ul>
<b>Submit Application</b>
<ul style="list-style-type: none"><li>• Yes Submit</li></ul>

To The General Manager,  
Huon Valley Council,

**Representation to Draft Huon Valley Local Provisions Schedule  
Re: 100 Turners Road, Cradoc, Tasmania**

Jonathan Cruickshank and Monica Wedd, owners of 100 Turners Rd Cradoc make this representation to the draft Huon Valley Local Provision Schedule.

On the merits submitted below, our representation establishes that the characteristics of our property, 100 Turners Rd Cradoc (PID [5857118](#), refer to Map 1 below), 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 100 Turners Rd Cradoc is as follows;

1. 100 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. 100 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, 100 Turners Rd Cradoc may be alternatively zoned 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;

<b>Characteristics of the title</b>	<b>Agriculture value of 100 Turners Rd Cradoc</b>
Title size	Low value: <ul style="list-style-type: none"> <li>- Smaller size (10.96 ha).</li> </ul>
Development on the title	Low value: <ul style="list-style-type: none"> <li>- No existing buildings.</li> <li>- Aged fencing infrastructure largely in state of disrepair.</li> <li>- Two small dams of unviable volume for irrigation purposes.</li> </ul>
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: <ul style="list-style-type: none"> <li>- Adjacent agriculture titles are small and all are encumbered by existing dwellings.</li> <li>- Draft LPS REM raw data mapping (Map 2) indicates Priority Vegetation around the title edges and through a central corridor linking habitat remnants on adjacent titles.</li> <li>- Immediate interface with Threatened Native Vegetation Community 14 (Eucalyptus amygdalina forest and woodland on sandstone) on four adjoining titles. Community 14 encroaches into the property in three locations.</li> </ul>
Current and potential use	Low value: <ul style="list-style-type: none"> <li>- The property was unused and derelict when purchased by the current owners in 2020 and is now in an early stage of remediation. 3.3Ha (approx. 30%) of the title area is mapped as having High Waterlogging Hazard (Map 3), reducing potential winter usage. Existing pastures are extremely impoverished and weed infested.</li> <li>- Previous attempts at farming this title have included pigs, goats and mixed grazing between the 1970's to early 2000's. None of the ventures proved to be commercially viable.</li> </ul>

	<ul style="list-style-type: none"> <li>- Southern Tasmania Regional Land Use Strategy (page 28) lists the Huon Valley SLA Production Value per hectare at \$2032. If applied to the full land area, the title would return an unviable \$22,000 annually.</li> <li>- Potential agricultural uses are significantly fettered by existing residential developments on all adjoining titles draft-zoned as Landscape Conservation.</li> </ul>
Land capability	Low value: <ul style="list-style-type: none"> <li>- Mapped as LC5.</li> </ul>
Water available for irrigation	Low value: <ul style="list-style-type: none"> <li>- No irrigation resource.</li> </ul>
Regional context	Low value: <ul style="list-style-type: none"> <li>- 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.</li> </ul>

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 100 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.”

The adjoining property 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 100 Turners Rd and 54 Turners Rd (PID [5857089](#)) 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.

Regards,

**Jonathan Cruickshank**



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**Monica Wedd**



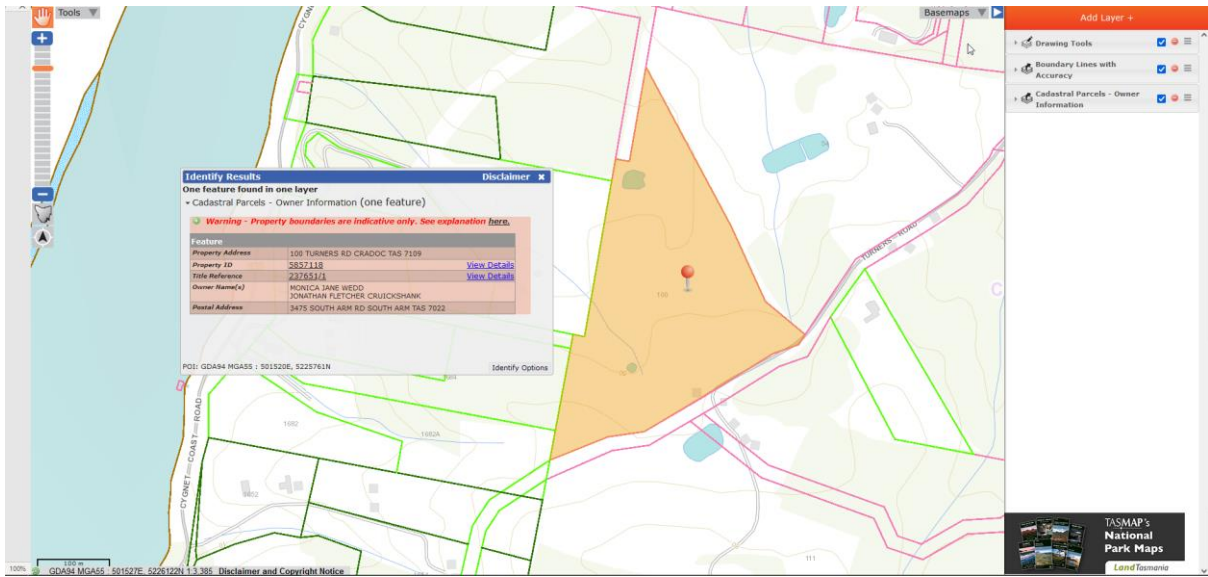
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## Map 1.

### Listmap: Cadastral Parcels – Owner Information



## Map 2.

### Draft LPS raw REM Priority Vegetation Area Overlay



### Map 3.

### Listmap: Soil Vulnerability - Waterlogging Hazard

