

From: "Prue deVries" <sleddogadventurestasmania@gmail.com>
Sent: Wed, 27 Apr 2022 13:46:19 +1000
To: hvc@huonvalley.tas.gov.au;"Prue deVries"
<sleddogadventurestasmania@gmail.com>
Subject: Rezoning of 1333 Lonnvale Road - Property ID 7589356

To Mr Browne
General Manager

We wish to request an extension of time to look at the impacts of the rezoning of our property, 1333 Lonnvale Road, Lonnvale which is currently zoned Rural but is proposed to move to the new Landscape Conservation Zone so that we are able to then lodge a submission. This has only recently been brought to our attention and we have not had the time to engage a consultant/planner to advise us of how this new zoning will impact upon us and we don't have the knowledge ourselves to understand all of the implications.

We have lived and worked this property for more than 35 years, we are a working farm, with originally a market garden and now under blueberry production along with our property at 1340 Lonnvale Road (this property is not being rezoned to LCZ). We also own and operate Sled Dog Adventures Tasmania and run an eco tourism business operating sled dog tours each winter with people travelling from all over Tasmania and the mainland to take a tour with us.

An extension of time would be of great assistance to us.

Sincerely,
Prue and Peter deVries

HUON VALLEY COUNCIL

Action
Officer:

27th May 2022
General Manager
Huon Valley Council
PO Box 210
Huonville TAS 7109

27 MAY 2022

HUON VALLEY COUNCIL

27 MAY 2022

File No:

Set ID:

CUSTOMER SERVICE

Attention: General Manager and Elected Members of Council,

RE: Representation for the Huon Valley Council's advertised zoning of 1333 Lonnavaile Road, Lonnavaile, Huon Valley. PID 7589356.

Executive Summary

Our names are Peter and Prue de Vries and we are the landowners of the above property which we have resided at for the past 35 years. The following is our representation in objection to the proposed Landscape Conservation zoning assigned by the Huon Valley Council (herein HVC) as part of the advertised draft Local Provisions Scheme (LPS) submission.

We believe that the more appropriate zone of **Rural** should be applied because the said property does not meet the Landscape Conservation Zone criteria but meets the criteria for Rural Zone under State Planning Provisions – Tasmanian Planning Scheme 2020 V3 (at as 19th February 2020) (TPS) which supports the Southern Tasmania Regional Land Use Strategy 2010–2035. Specifically, the Rural Zone criteria corresponds with our land characteristics, surrounding similar zoned folios, historical use and alteration of the land, and recognised land improvements.:

Our property is currently zoned as **26.0 Rural Resource** under the interim Huon Valley Planning Scheme 2015.



Property Identification Number

7589356

Locality

LONNAVAILE

Planning Zones

26.0 Rural Resource

Certificate of Title Reference (Volume/Folio)

242407/1

Municipality

Huon Valley

Planning Codes Overlay

Bushfire Prone Areas, Waterway and Coastal Protection Areas, Biodiversity Protection Area, Landslide Hazard Area

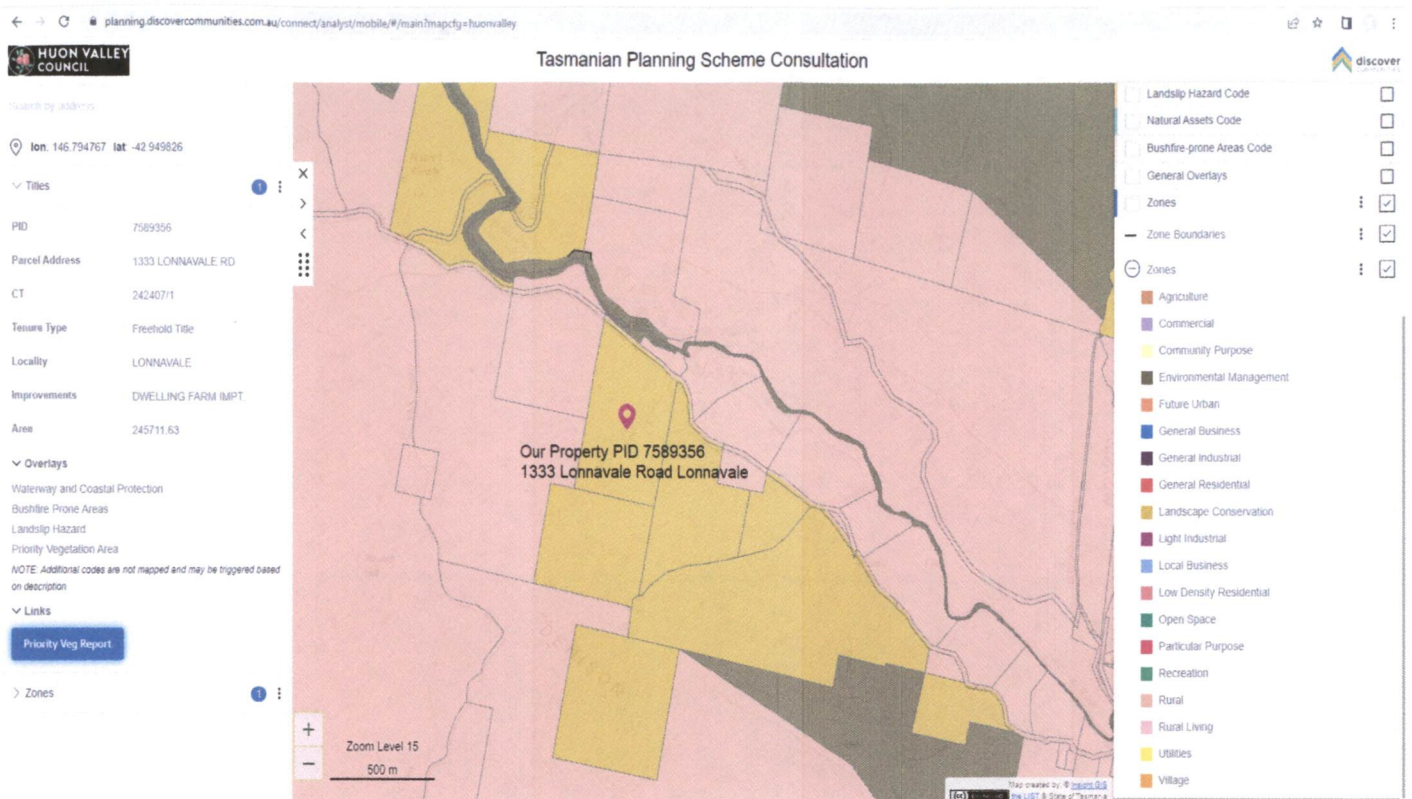


Figure 1 – Our Property location and the proposed Landscape Conservation zoning of neighbouring properties

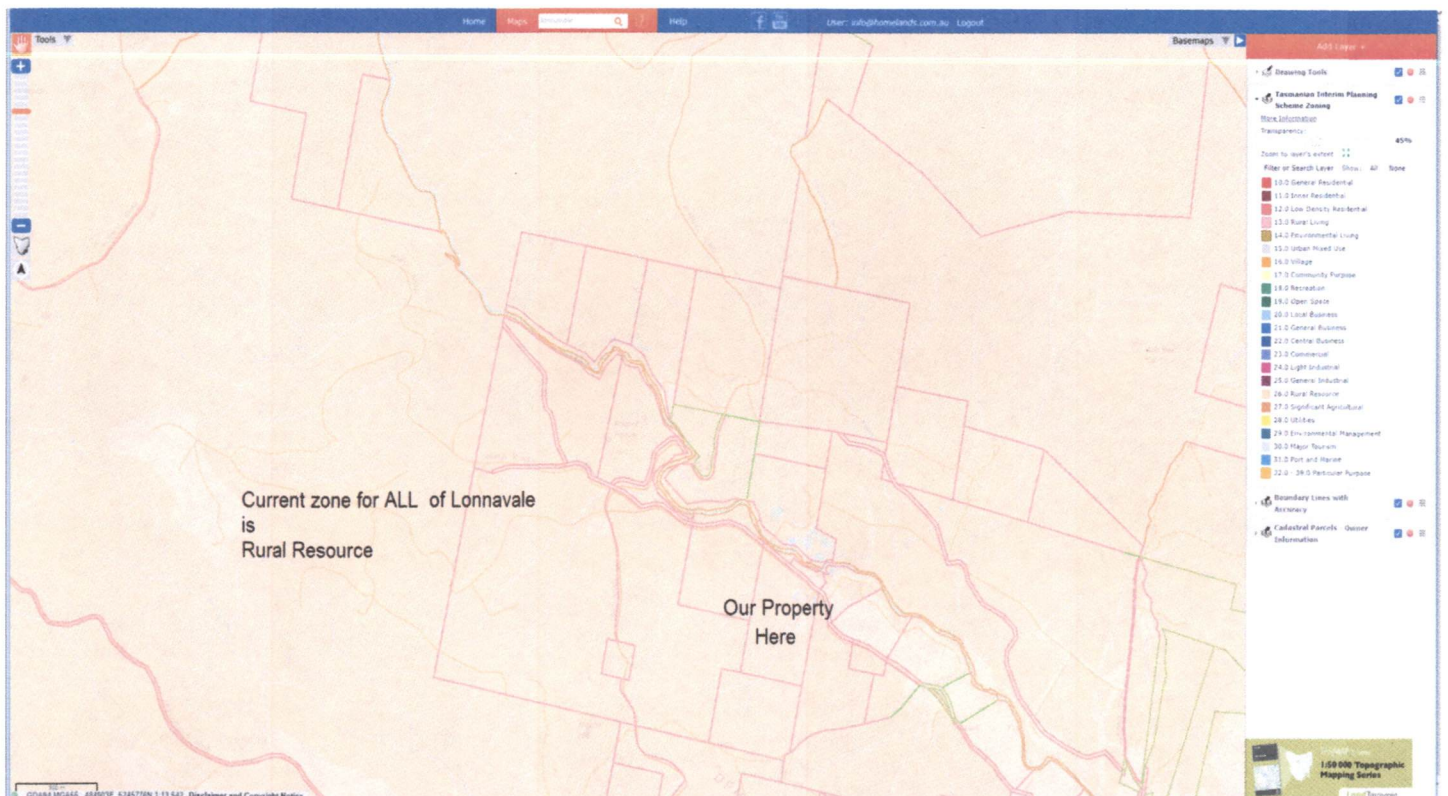


Figure 2: – Current Zoning for ALL of Lonnvale is Rural Resource

The property has a dwelling and associated sheds/storage as indicated on Huon Valley Council's interactive map. As a working farm, we have over the past three (3) decades had large commercial hothouses and market gardens. It is approximately 20% agricultural land. In 2018 we cultivated 1000 blueberry bushes and these were planted in 2020, complementing our blueberry orchards on our property located directly across the road at 1340 Lonnvale Road. At least 70% of our property is covered with regrowth, forestry operations were conducted by private harvesters in the 1900's with remnants of old sawmills still evident today, and for many years in the 80', 90s, and 2000's pig grazing occurred on many areas of the property for land clearing purposes. A bushfire went through the property in 1990.

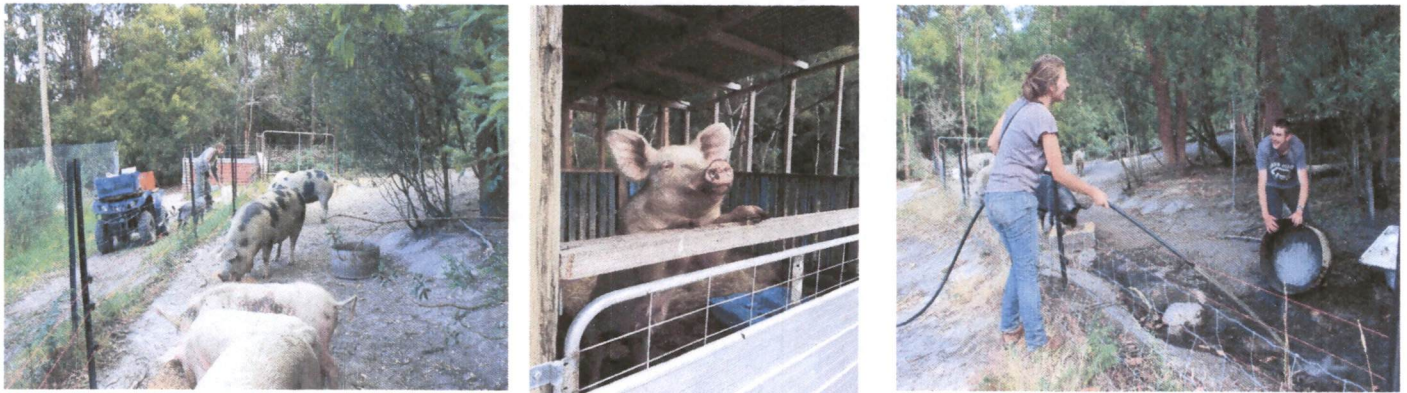
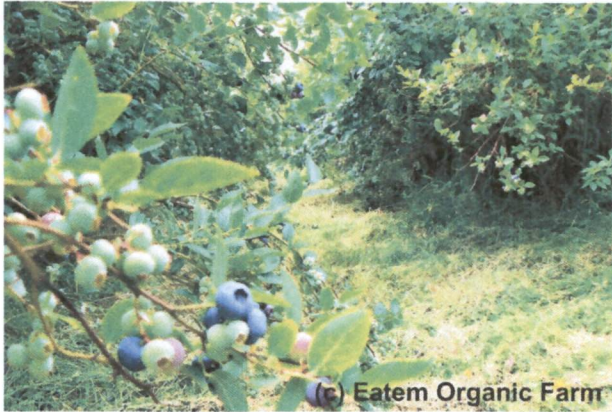


Figure 3, 4 & 5: in the 1980's, 90's and 2000's pigs were utilised on the land for land cultivation



Figures 6, 7 & 8: Our farming practices has been over the past 30 years – through development of the soils, to commercial operations growing produce for Tasmanian markets in both hothouses and in large open cropping beds

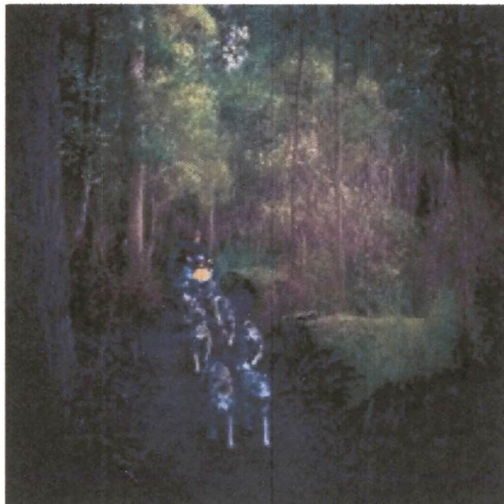
Our Farm has been Certified Organic for the past two decades and has been recognised for the quality produce grown through-out Tasmania. The farm is known as Eatem Organic Farm, and our ABN reflects our status as a primary producer. The approx.: 1 acre of fertile soil is productive land, and now under blueberry production – revenue from our farm and our tourism operation supports our family financially – one relies on the other to provide a liveable income.



Figures 9 &10: We have been growing and harvesting blueberries on our neighbouring property at 1340 Lonnavale Road for the past decade and 4 years ago we propagated over a thousand new bushes and planted those on our property at 1333 Lonnavale road to expand our orchard.

ECO TOURISM VENTURE

We own and operate Sled Dog Adventures Tasmania, and have a large working sled dog kennel situated on the property and utilise trails that we have developed on the property to run dryland sled dog tours. This is Australia's southernmost working sled dog tour company and attracts a large and growing number of tourists from right across the country with the business seeing a significant growth per annum in visitation. Our tours are recognised locally and internationally with growing acclaim. In fact HVC has regularly posted across social media platforms advertising our tours. Our 30 dogs, many whom have been rescued or rehomed with us live on our property in their purpose built kennels and our tours run between the River's Edge Wilderness Camping Ground located opposite our property and our property at 1333 Lonnavale Road. Hundreds of visitor's venture onto the property every year to view our working kennel as part of our kennel tours.



Our Website: www.sleddogadventurestasmania.com.au

Figure 11 & 12: The developed forest trails on our property and the team.



Figure 13: There has been a lot of focus and work developing a network of trails through our property for operating our Eco Sled Dog Tours – we have been mindful of having minimum impact on our surrounds – these trails though have a base of gravel down and are regularly maintained. We have plans to expand these network of trails

Responding to the proposed Landscape Conservation Zoning under the new Tasmanian Planning Scheme (effective 2019)

Table 12

Zone Application Guidelines	Comments
<p>LCZ 1 <i>The Landscape Conservation Zone should be applied to land with landscape values that are identified for protection and conservation, such as bushland areas, large areas of native vegetation, or areas of important scenic values, where some small-scale use or development may be appropriate.</i></p>	<p>The application of 80% native vegetation coverage coupled with the presence of either the Natural Assets or Scenic Landscape Code overlay as the first level of selection meets the intent of this guideline in that most of the property is constrained but there may be some potential for small scale use or development.</p> <p>A significant portion of the properties selected are located on the vegetated scenic hill slopes that characterise the Huon Valley. These areas have been spared from historical clearing due to being considered suboptimal for agriculture.</p> <p>The analysis of 'large areas of native vegetation' was attributed to a minimum native vegetation patch size of 20 ha. This links directly with the LCZ use standard 22.5.1 P1 minimum lot size of 20 ha.</p>

LCZ1 The property is based at the lower slope of the hillside, and has a very gentle slope across much of the property. The property has been selectively logged in the 1900's, and farmed for a range of crops for many decades, from berries, to flowers, to vegetables and now under blueberry production. Large tracks of the property were cleared at different stages of ownership, but have since revegetated.

<p>LCZ 2 <i>The Landscape Conservation Zone may be applied to:</i></p> <p><i>(a) large areas of bushland or large areas of native vegetation which are not otherwise reserved, but contains threatened native vegetation communities, threatened species or other areas of locally or regionally important native vegetation;</i></p> <p><i>(b) land that has significant constraints on development through the application of the Natural Assets Code or Scenic Protection Code; or</i></p> <p><i>(c) land within an interim planning scheme Environmental Living Zone and the primary intention is for the protection and conservation of landscape values.</i></p>	<p>Addressed by ensuring properties contain the Natural Assets Code overlay. The Huon Valley Natural Assets code is based on the 'Regional Ecosystem Model' which selected priority vegetation patches based on a range of criteria including, threat status, threatened species habitat, relative reservation, local scale fragmentation, and relative rarity.</p> <p>It is important to note that modelling is based on best available data. Portions of the Huon Valley, especially those with limited road access or in remote areas, have had limited sampling and are somewhat data deficient.</p> <p>The Huon Valley is privileged to have a high diversity and abundance of threatened species, placing additional importance on protecting not only core habitat areas but natural ecological corridors between them that allow for species dispersion.</p>
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LCZ2 - response

We question the threatened species and we ask that our property be assessed as in the past 35 years we have not identified any threatened species on our property. Referring to LCZ (C) we are currently zoned Rural Resource NOT Environmental Living

We are located in a remote area where insufficient data has not been available to support vegetation maps used to suggest the new Zone proposed to Landscape Conservation Zone.

With reference to the last paragraph it notes that the Huon Valley is privileged to have a high diversity and abundance of threatened species and yet the areas of Forestry operations neighbouring our property will continue to remove these habitats.

<p>LCZ 3 <i>The Landscape Conservation Zone may be applied to a group of titles with landscape values that are less than the allowable minimum lot size for the zone.</i></p>	<p>This was addressed by using the following selection criteria to select LCZ suitability:</p> <ul style="list-style-type: none"> • Three or more adjoining properties • Borders existing Environmental
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LCZ3

There are three titles that border our property and are currently zoned Rural Resource. Two of those neighbouring properties are to move to the LCZ and the third will remain Rural Resource, due to it being state owned forest and is earmarked for logging. The two other properties have never had any development and are undisturbed bush with landscape aspect to the ridgeline and perfectly suits the Landscape Conservation Zoning.


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	Forestry Tasmania

<p>20.0</p> <p>Rural Zone</p>  <p>Red 228, Green 172, Blue 144</p>	<p>The purpose of the Rural Zone is:</p> <p>20.1.1 To provide for a range of use or development in a rural location:</p> <p>(a) where agricultural use is limited or marginal due to topographical, environmental or other site or regional characteristics;</p> <p>(b) that requires a rural location for operational reasons;</p> <p>(c) is compatible with agricultural use if occurring on agricultural land;</p> <p>(d) minimises adverse impacts on surrounding uses.</p> <p>20.1.2 To minimise conversion of agricultural land for non-agricultural use.</p> <p>20.1.3 To ensure that use or development is of a scale and intensity that is appropriate for a rural location and</p>	<p>RZ 1 The Rural Zone should be applied to land in non-urban areas with limited or no potential for agriculture as a consequence of topographical, environmental or other characteristics of the area, and which is not more appropriately included within the Landscape Conservation Zone or Environmental Management Zone for the protection of specific values.</p> <p>RZ 2 The Rural Zone should only be applied after considering whether the land is suitable for the Agriculture Zone in accordance with the 'Land Potentially Suitable for Agriculture Zone' layer published on the LIST.</p> <p>RZ 3 The Rural Zone may be applied to land identified in the 'Land Potentially Suitable for Agriculture Zone' layer, if:</p> <p>(a) it can be demonstrated that 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;</p> <p>(b) it can be demonstrated that there are significant constraints to agricultural use occurring on the land;</p> <p>(c) the land is identified for the protection of a strategically important naturally occurring resource which is more appropriately located in the Rural Zone and is supported by strategic analysis;</p>
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Zone	Zone Purpose	Zone Application Guidelines
	<p>does not compromise the function of surrounding settlements.</p>	<p>(d) the land is identified for a strategically important use or development that is more appropriately located in the Rural Zone and is supported by strategic analysis; or</p> <p>(e) it can be demonstrated, by strategic analysis, that the Rural Zone is otherwise more appropriate for the land.</p>

RZ1

The Lonnvale community is Rural with a large number of properties farming cattle or sheep. Our property lends itself to a wide range of uses as already outlined from vegetable and fruit production, animal husbandry and tourism ventures. This property has areas of fertile soils from many years of improving soil conditions utilising organic and biodynamic farming principles.

The vegetation maps show that we have the same or even less than neighbouring Crown Land as indicated and they will understandably remain zoned Rural

RZ2

The land is suited to some agriculture purposes as proven over decades of growing a wide variety of crops. (not suited to large areas of grazing for livestock) – but suited to a market garden

RZ3

The property lends itself to agricultural use and is not integral to the management of a larger farm holding within an Agricultural Zone.

Natural Assets Code and the Natural Values Atlas – OVERLAYS

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This Priority Vegetation Area overlay report shows a subset of the Regional Ecosystem Model. The overlay contained in the planning scheme is shown only over zones to which it can apply. The Regional Ecosystem Model (REM) is a comprehensive, high resolution spatial analysis that identifies:

- native vegetation and threatened species and their relative conservation status and management priority;
- the characteristics of the landscape that may affect its ability to sustain these elements.

The subsets of information that are included are:

- Threatened native vegetation communities is based on TasVeg 3.0, but has been corrected for inherent logical consistency issues and includes credible field-based mapping where it was available.
- Threatened flora and fauna species locations and habitat are modelled using two methods:
 - Rules applied to Natural Values Atlas (NVA) records that are customised for each species to reflect their patterns of local distribution (e.g. riparian species), based on a limited number of habitat variables; and
 - More detailed habitat models for about 100 threatened fauna species that reflect agreed habitat definitions used by the Forest Practices Authority but utilise a much wider range of data, including landforms and vegetation structural maturity, to more accurately identify habitat and potential habitat.
- Native vegetation of local importance includes:
 - a subset of threatened fauna species habitat models,
 - native vegetation with limited bioregional reservation and extent and native vegetation remnants on heavily cleared types of land where local factors affect ecological sustainability of the landscape.

Each local area contributes to the survival of threatened vegetation communities, threatened flora and threatened fauna within a State wide mosaic that enables the distribution of species to be maintained and provides for mobility of fauna through connected habitat. Each subset of data that is identified on the property is described below.

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Priority Vegetation Details

Relative Rarity



Relative rarity, or extent, is scaled to reflect increased importance for vegetation types which are more restricted, and less importance for those which are relatively extensive. The threshold of 2,000 ha is used by the Forest Practices Authority.

Why is it included?

- Less than 2000 hectares of the community in the bioregion

Data Source:

- TasVeg 3.0 (minor exceptions)

• (NAV) *Allocasuarina verticillata* forest

Reliability:

- Highly variable

Management:

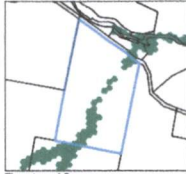
- Check TasVeg for field verification
- Consider local extent, condition & management options
- Potentially require on-ground field verification

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Threatened Fauna and Significant Habitat



These are species listed as threatened fauna under the Tasmanian Threatened Species Protection Act (1975) or Commonwealth Environment Protection and Biodiversity Conservation Act (1999). Listed threatened species have statutory recognition that they are likely to become extinct if the factors causing them to be threatened are not managed. Species may be listed due to historical loss since settlement, natural rarity giving rise to potential risk, or impacts of particular land use and land management practices.

Threatened fauna habitat characteristics are extremely varied and are modelled as significant based on Natural Values Atlas records with a limited number of habitat variables or more detailed customised models for about 100 fauna species. Some species habitat occurs across the landscape but not all sites may be essential for species survival and not all suitable habitat may be occupied. Species that rely on this type of habitat are classified as landscape-dependent and are regarded as being of local importance, however the relative importance of the site to the survival of the species can only be known in response to field verification, the context and the nature of a proposal.

Threatened Fauna
• mount mangana stag beetle



Threatened Fauna Habitat
• eastern quoll

Why is it included?

- Statutory recognition that species extinction is likely, however not all sites are important or occupied

Data Source:

- NVA records combined with REM point-based modelling rules
- Habitat-based models

Reliability:

- Variable

Management:

- Check species observation source
- Check data on habitat and local context
- Potentially require on-ground field verification

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priority_veg_report.php

Priority Vegetation Report

PID	CT	Address	Locality	Improvements	Area (m ²)
7589356	242407/1	1333 LONNAVALE RD	LONNAVALE	DWELLING FARM IMPT	245712

Priority Vegetation Overview

PRIORITY VEGETATION OVERVIEW MAP



This Priority Vegetation Area overlay report shows a subset of the Regional Ecosystem Model. The overlay contained in the planning scheme is shown only over zones to which it can apply.

The Regional Ecosystem Model (REM) is a comprehensive, high resolution spatial analysis that identifies:

- native vegetation and threatened species and their relative conservation status and management priority;
- the characteristics of the landscape that may affect its ability to sustain these elements.

The subsets of information that are included are:


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priority_vsq_report.php

Threatened Fauna and Significant Habitat



These are species listed as threatened fauna under the Tasmanian Threatened Species Protection Act (1975) or Commonwealth Environment Protection and Biodiversity Conservation Act (1999). Listed threatened species have statutory recognition that they are likely to become extinct if the factors causing them to be threatened are not managed. Species may be listed due to historical loss since settlement, natural rarity giving rise to potential risk, or impacts of particular land use and land management practices.

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Why is it included?

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Data Source:

- NVA records combined with REM point-based modelling rules
- Habitat-based models

Reliability:

- Variable

Management:

- Check species observation source
- Check data on habitat and local context
- Potentially require on-ground field verification

Threatened Fauna

- mount mangana stag beetle

Threatened Fauna Habitat

- eastern quoll

Contacts

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Sustainable Timber Forestry

Forests + You Access + Permits Plans + Policies Our Responsibilities About Us Easy Read

land we manage
recreational hunting areas

For more information on our Access Map, contact us.

Contact Us



Access Map

1333 Lonnvale Road Lonnvale PID 07589356

Layers Legend

Three Year Plan Published

- 2021
- 2022
- 2023
- Contingency

Permanent Timber Production Zone Land (PTPZ)

Nomenclature Search

Sustainable Timbers are our immediate neighbour and they will remain zoned Rural under the new TPS – This land is scheduled for logging in 2022

PART 1 - Objectives of the Resource Management and Planning System of Tasmania

1. The objectives of the resource management and planning system of Tasmania are –

(a) to promote the sustainable development of natural and physical resources and the maintenance of ecological processes and genetic diversity; and

(b) to provide for the fair, orderly and sustainable use and development of air, land and water; and

(c) to encourage public involvement in resource management and planning; and

(d) to facilitate economic development in accordance with the objectives set out in [paragraphs \(a\)](#) , [\(b\)](#) and [\(c\)](#) ; and

(e) to promote the sharing of responsibility for resource management and planning between the different spheres of Government, the community and industry in the State.

2. In [clause 1 \(a\)](#) , **sustainable development** means managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural well-being and for their health and safety while –

(a) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations; and

(b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and

(c) avoiding, remedying or mitigating any adverse effects of activities on the environment.

In short...

The proposed zoning is not fair or orderly because of the regulatory impact on our property that neighbouring properties don't experience because of this differential zoning and does not facilitate the future economic development of our property.

Summary

It appears that there is glaring inequity in the application of the LC zoning to private land and Rural zoning to adjoining State forest, despite it being the same 'landscape'. This approach sets up inequities in the impacts on private businesses such as the endeavours that we undertake on our property. Regarding landscape, there is private land on the opposite side of the valley to the north of our property that is equivalent, or even higher elevation and that property is proposed to be zoned Rural.

The approach to zoning in the valley from all accounts has been inconsistent. If visual impacts on forested slopes are a concern (noting that the forestry operations adjoining our property will have a significant impact), then a scenic management overlay based on elevation and features is the appropriate approach, rather than the blunt instrument of zoning to boundaries that has a restrictive effect on existing primary industry and tourist enterprises. Long-standing agricultural and tourist operation uses **should not** be subject to discretions that may impede future enhancement of our operations. Our intention is to grow the tourism aspect of our business on our property.

Moving from the Landscape Conservation Zone to the Rural Zone is the most appropriate outcome for our property based on the information we have provided as overall it meets the criteria for the Rural Zone and not so much the criteria for the Landscape Conservation Zone. The property is rural and currently being used for rural purposes – There is an area on the property being utilised for small scale agricultural purposes and this has been the case for several decades. From vegetable and fruit cropping for the domestic market to offering a significant tourist destination for our growing and in demand Eco Sled Dog Tour business – both businesses are viable together and provide employment for ourselves with increasing employment opportunities in the foreseeable future. Our blueberry orchard propagated in 2018 and planted in 2020 complements our large existing orchard on our neighbouring property at 1340 Lonnvale Road. Our Eco Tourism business compliments the neighbouring River's Edge Wilderness Camping ground bringing visitors who then choose stay within the region.

What is Council's strategy that puts greater restrictions on productive properties in the municipality. From all accounts a blunt methodology for application of the zone that does not take into account locational nuances does not represent in our view 'sound strategic planning'.

Sincerely,
Peter and Prue de Vries



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LONNAVALE TAS 7109
sleddogadventurestasmania@gmail.com