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**Representation about the Draft West Tamar Local Provisions Schedule .**

Dear Mr Vos,

We wish to make representation and request review of draft zoning maps applied to our property at 2922 West Tamar Highway Loira, PID 2909322.

We note that the *West Tamar Draft LPS – Exhibited Zone Mapping 1 February 2021* has our property zoned in the new 'Agriculture Zone' (see figure 1 attached). We contend this is an incorrect zoning and suggest that the property is better assigned to Rural Zone.

Our primary concern with the present zoning is that in the Agriculture Zone, consideration is not given to Natural Assets including Priority Vegetation Areas as is afforded other rural zones.

We feel this is a fundamental oversight of the State Planning Provisions dealing with the Agriculture Zone in that retention and management of native vegetation is fundamental to healthy and sustainable agricultural production as well as critical to nature conservation, carbon storage and sequestration as well as the amenity and the unique scenic character of the West Tamar.

We have reviewed the Agricultural Land Management Planning Project reports and methodologies and we consider there is insufficient justification provided in the report to the SPP to support the exclusion of native vegetation retention from planning consideration under these state and local codes applying to the Agriculture Zone.

The LPS Exhibited Mapping is erroneous in that it fails to display the existence of Priority Vegetation Areas (as shown by TASVEG 4.0 ) in the Agriculture Zone.

Despite the fact that the SPP excludes consideration of Priority Vegetation in relevant assessment codes, the fact remains that the vegetation exists and is relevant and directly beneficial to sustainable agricultural systems in the Municipality. The presentation of the Priority Vegetation Area mapping in the Agriculture Zone would also be valuable in circumstances where land is rezoned and such mapping becomes assessable.

Our arguments for review of our land zoning for PID 2909322 in the draft mapping is as follows:

The report 'Agricultural Land Mapping in the West Tamar Municipality' prepared by AK Consultants (WT Report) provides rationale for more localised interpretation of the statewide Agricultural Land Mapping Project (ALMP). Both the WT report and the ALMP report rely on broad rules for allocating cadastral parcels to Zones.

Table 4 of the WT Report identifies 4 characteristic guidelines for zoning decisions. We consider based on two of these characteristics, our property is more appropriately zoned Rural rather than Agricultural. Reasoning in relation to each guideline characteristic is as follows:

#### *Consistency of land use patterns*

Our property adjoins a Crown Reserve allocated Environmental Management Zone, and that reserve adjoins significant areas of land zoned as Rural (see figure 1 below). The proximity of our property to the Rural Zone provides for consistency of land use, especially since our priority land use is rural residential and we are actively working to establish property that balances sustainable grazing with nature conservation and regeneration.

Private properties surrounding us are largely rural residential blocks, several of which immediately adjoining us to the north were excluded from Agricultural Zone in the ALMP but were subsequently rezoned to agricultural in the WT report. (see figure 2) We consider the ALMP was accurate excluding these parcels from the Ag Zone and that by inference, our property is similarly unsuited to the Agriculture Zone.

We note also that both the ALMP and WT Report zoned a cluster of 8 parcels close to our property as Rural. The rezoning of our property along with neighbouring small lots would establish a cluster which provides a consistent land use pattern

We note further that existing land capability mapping (see figure 3) for our area indicates our property to be broadly class 4 land, while this is a reasonable broadscale landscape allocation, we advise that riparian and lowlying land on the property is unlikely to meet this criterion due to waterlogging and topographical issues. These areas are unlikely to be viable or suitable for agriculture in the future. They are also carrying diverse and stable riparian vegetation which is important in itself for water quality outcomes into the Tamar Estuary. (see figure 5).

Enterprise suitability mapping available on LIST Map supports this contention in broad terms based on contemporary soil and climatic variables. Investigation of enterprise suitability under climate change (CFT 2030 RCP scenario 8.5, as shown on List map) indicates declining enterprise suitability for agriculture on our property due to predicted very high to extreme frost risk. By 2050 the property is predicted to be unsuitable for table wine grape production,

We note that the 2019 Land Use mapping prepared by DPIWE (see figure 4) identified our property and many surrounding it as '*Rural Residential without agriculture*' or '*Residential and farm infrastructure*' we consider this mapping is evidence of existing and future land use potential for the smaller residential blocks in this area. Such a land use is more appropriately assigned Rural Zone on the basis of more diversified land use and also relevant to the application of the Priority Vegetation Area layers.

*Minimum three titles to make a zone.*

We note that despite one title (PID 1750962) zoned Environmental Management, our property adjoins a significant number of properties zoned Rural, we consider this is an adequate link to meet this guideline, we also reflect on the ALMP mapping of adjoining properties outside of the Agriculture Zone and the potential to connect zoning with the small island of parcels zoned rural surrounding PID 7751982. Such a connection to the existing rural zoned lots provides a corridor of lots to which the priority vegetation layer applies and despite the West Tamar Highway, provides a corridor for longer term wildlife habitat.

We have not considered the guidelines on split zoning or multiple ownership of contiguous titles as these are not relevant to our case.

We note further in the 'Assessed area summaries' provided in the WT report (see page 24), Loira area was lumped into Agriculture Zone based loosely on land capability and presumed suitability for wine grape production. Additional information available on LISTmap, notably the Enterprise Versatility index (a compilation of enterprise suitability mapping layers) suggest there are areas of moderate to low enterprise versatility on the property, mainly suited for pasture and grazing. Enterprise suitability for table wine grapes is largely only moderately suitable due to high frost risk and growing degree days.

This information suggests that the land is well suited to sub commercial rural uses and residential small property size blocks, which is what it is its present use as per Land Use mapping 2019.

We also suggest the decision of the drafters of the WT Report to exclude the cluster of titles near us from the Agriculture zone (as per quote below) is justified and that a similar or not identical rationale could be applied to the bulk of small residential properties in the Loira area, including our property.

*The exceptions were; a cluster of titles on the northern end of the assessed area (CT 74601/1, CT 63673/1, CT 27677/1 & CT 40352/1), these titles all have existing dwellings and are small in area (3 –8ha), and a cluster of titles to the south of the assessed area were also determined to be more suitable for the Rural zone (CT 122544/1, CT 60873/11, CT 44814/1, CT 223891/1, CT 240602/1 & CT 13934/1). The two northern titles of this cluster are entirely covered in native vegetation, with the most northern title also containing a dwelling, while, remaining titles are small in area, all contain a dwelling and are constrained from being farmed in conjunction with surrounding titles because of these existing dwellings.*

We encourage you and West Tamar Council to consider our representation and to revisit recommendations in the WT report as they apply to the Loira area. Our primary interest is in ensuring that priority vegetation and habitat are considered in resource development activities in our area.

We encourage you and West Tamar Council to refer the matter of making Priority Vegetation Areas assessable within Agriculture Zone on the basis of the integral value of native vegetation to sustainable farming.

West Tamar Municipality is a highly diverse and ecologically important region, a core range for nationally listed mammals (such as Eastern Barred Bandicoot, Eastern Quoll, Spotted tail Quoll ) it is critical for conservation of habitat for resident and migratory bird species and it adjoins a globally significant estuarine system, Excluding the consideration of priority vegetation from the Natural Assets code for large areas of the municipality weakens the significance and value of these natural assets for present and future generations.

We entreat you to consider as a Council reinstating the Priority Vegetation Area mapping to land zoned Agriculture, if only as a silent reminder of the presence of these areas and to act as a trigger for resource developers to investigate further their obligations to minimise impacts on these vulnerable areas.

Yours sincerely

Peter Voller PSM, B App Sc

Joanna Voller, B Ag Sc

Figure 1 – Excerpt from West Tamar Exhibited Zone Mapping 1 February 2021 identifying PID 2909322

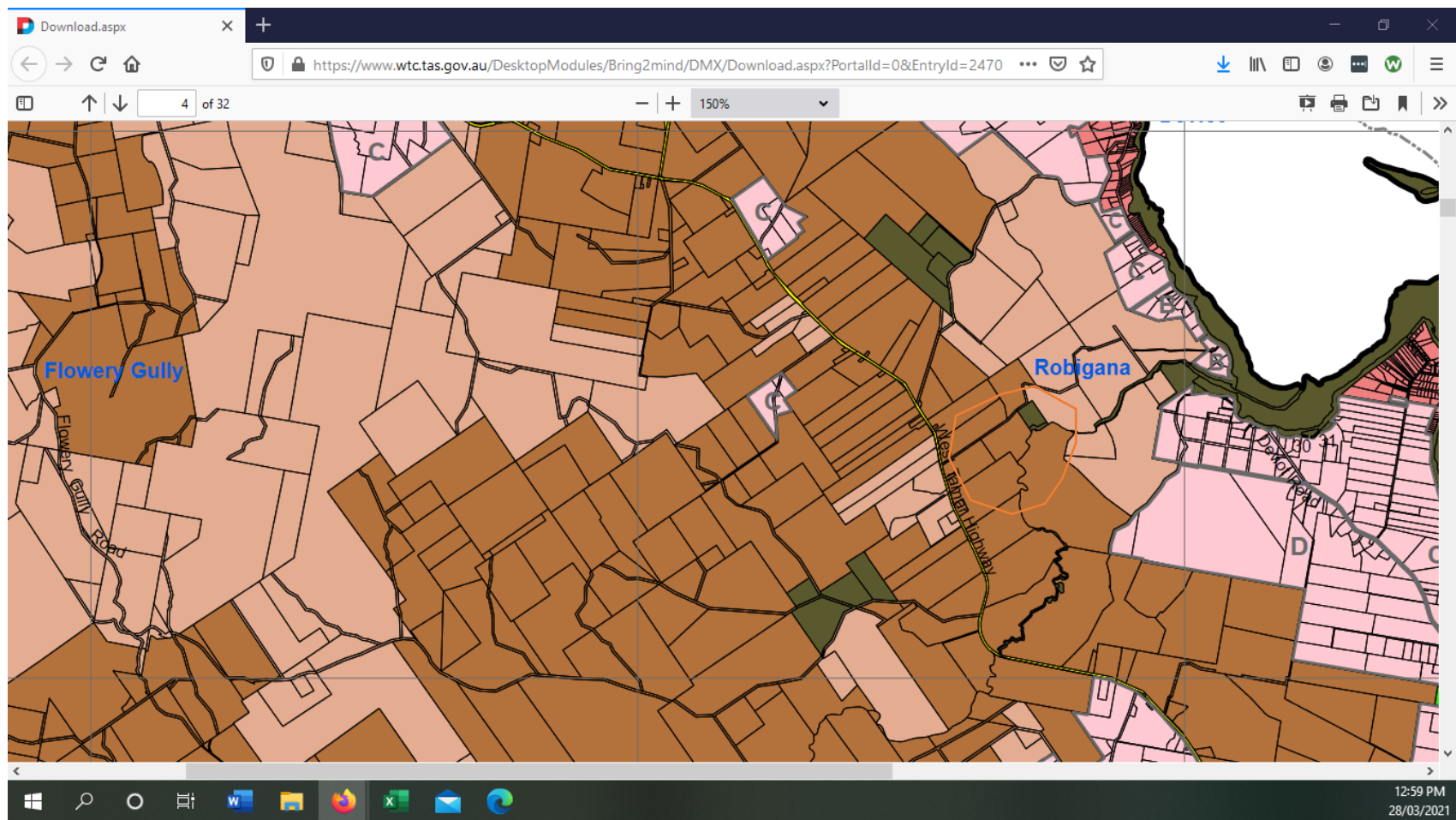


Figure 2 – Excerpt from ALMPS mapping identifying PID 2909322

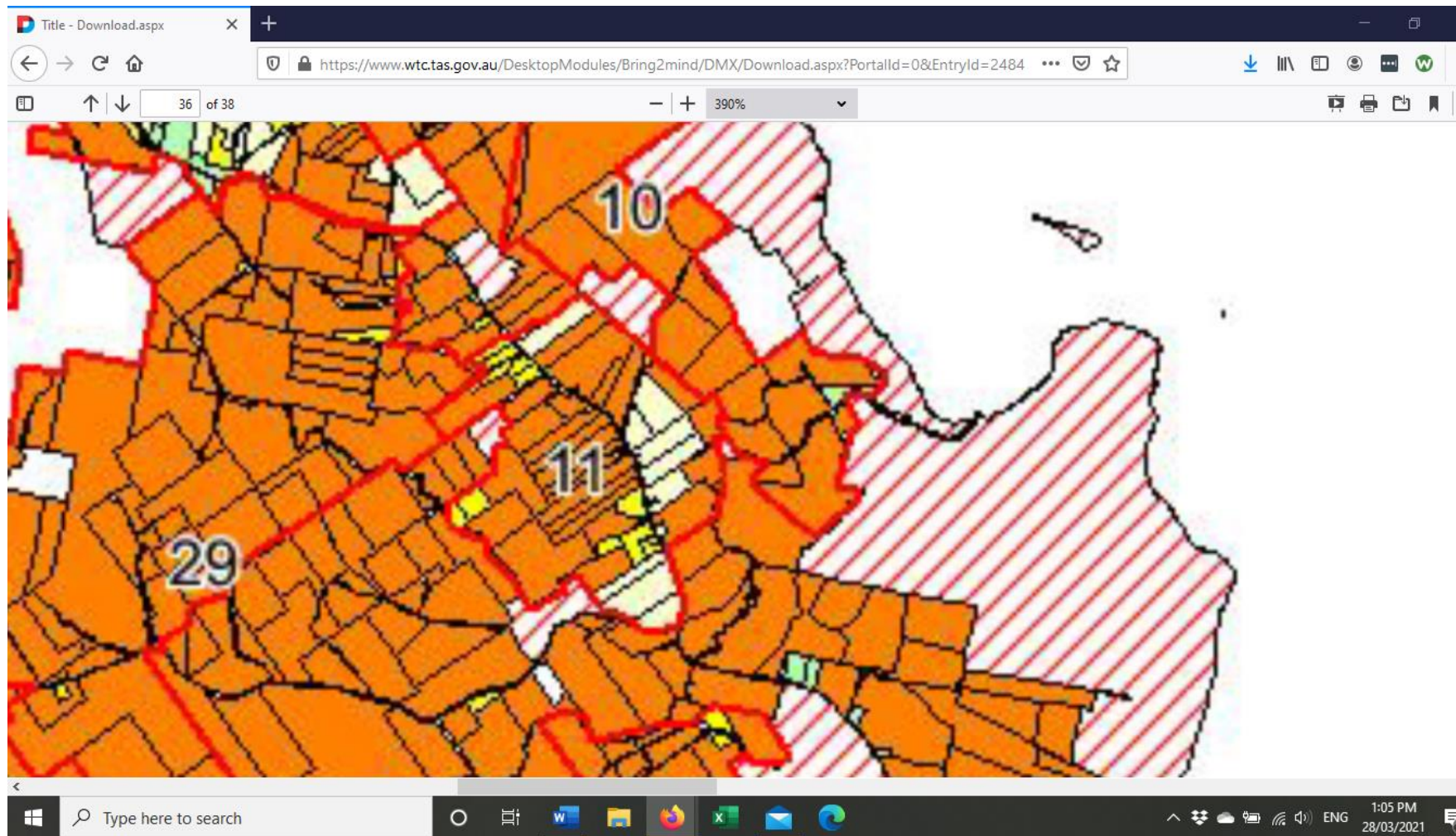




Figure 3 – Land use mapping (Grose 1999) as presented on LISTmap identifying PID 2909322

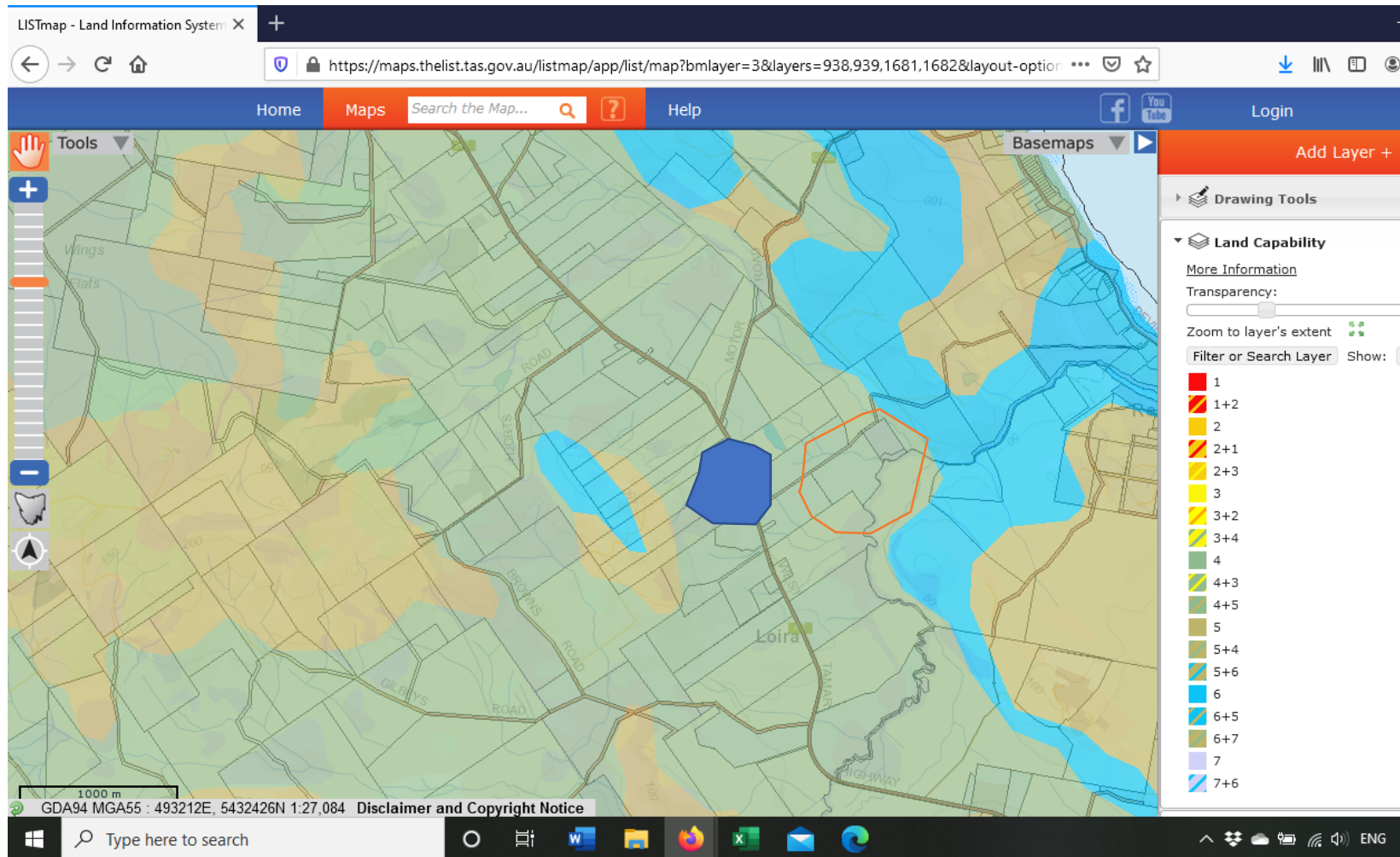


Figure 4 – Land Use Mapping 2019 – as displayed on LIST map identifying PID 2909322

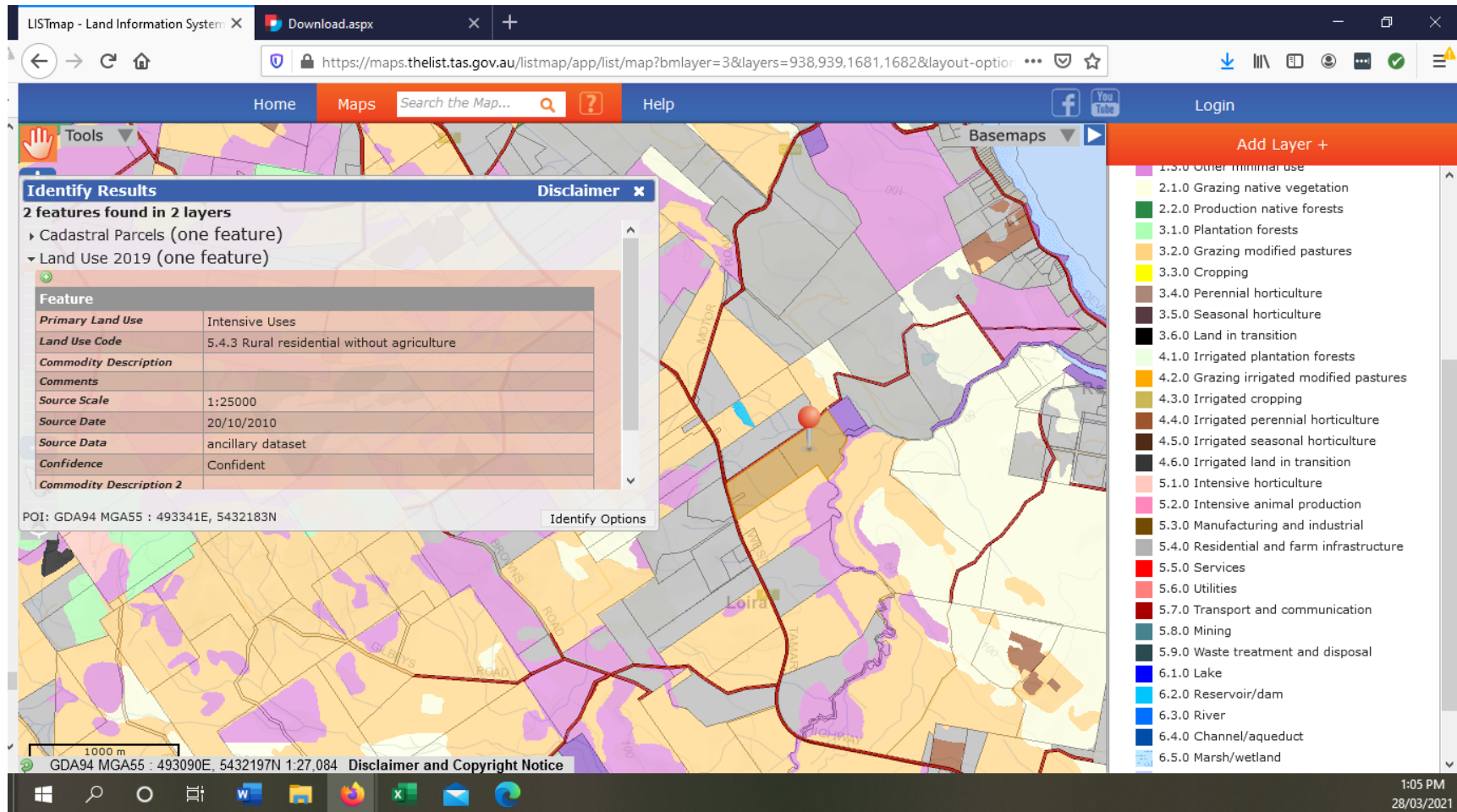




Figure 5 TASVEG 4.0 / Live mapping showing threatened communities as shown on LISTmap identifying PID 2909322

