

Thursday, 14 September 2023

Ref: 305028-01_L01_Rev0

The General Manager
PO Box 63
Latrobe TAS 7307

Written submission to significant modification amendment 1.1t

Dear Sir,

We herewith submit a representation to the draft amendment of the Latrobe LPS regarding a property at 345 Squeaking Point Road, Thirlstane (FR227658/1) owned by Matthew and Melissa Carter.

A representation was submitted to the initial process (Representation 17) requesting that the property be zoned for rural residential purposes to allow for residential development. Council recognised that the land should be zoned rural residential by recommending the Rural Living Zone D, which is now proposed as part of the significant modification.

While our clients are supportive of a Rural Living Zone being applied to their land, we consider the Rural Living Zone A classification to be more appropriate. It is generally accepted that the strategic directions set by the Cradle Coast Regional Land Use Strategy are outdated in regard to predicted population growth of the area. Evidence has been provided that there is insufficient land supply particularly for the popular choice of rural living. Other planning instruments will provide protection for natural values such as waterways, vegetation, and fauna, and bushfire safety. Rural living has proven to be a popular and sustainable lifestyle choice for many residents of the Latrobe municipality area, particularly in the vicinity of our client's land.

Additionally, the application of the Rural Living Zone instead of the Agricultural Zone requires the application of the priority vegetation overlay to the site. While it is acknowledged that the protection of threatened and endangered vegetation communities is important, the extent over previously cleared and pastureland appears too extensive and potentially restrictive for future development.



FIGURE 1: AERIAL PHOTO OF SITE WITH PROPOSED VEGETATION OVERLAY (SOURCE: LIST)

The aerial image shows above clearly shows areas of mostly undisturbed vegetation and previously cleared areas. It is noted that there are known and identified threaten species in the north-eastern corner of the property. A report (attached to this representation) was prepared to identify the vegetation community. The report recommends a defined habitat protection zone, which has been established by the owner (clearly shown on the aerial image).

We respectfully request to consider the Rural Living A Zone for this land as well as a potential redefinition of the priority vegetation overlay.

Your sincerely

Jana Rockliff
Town Planner

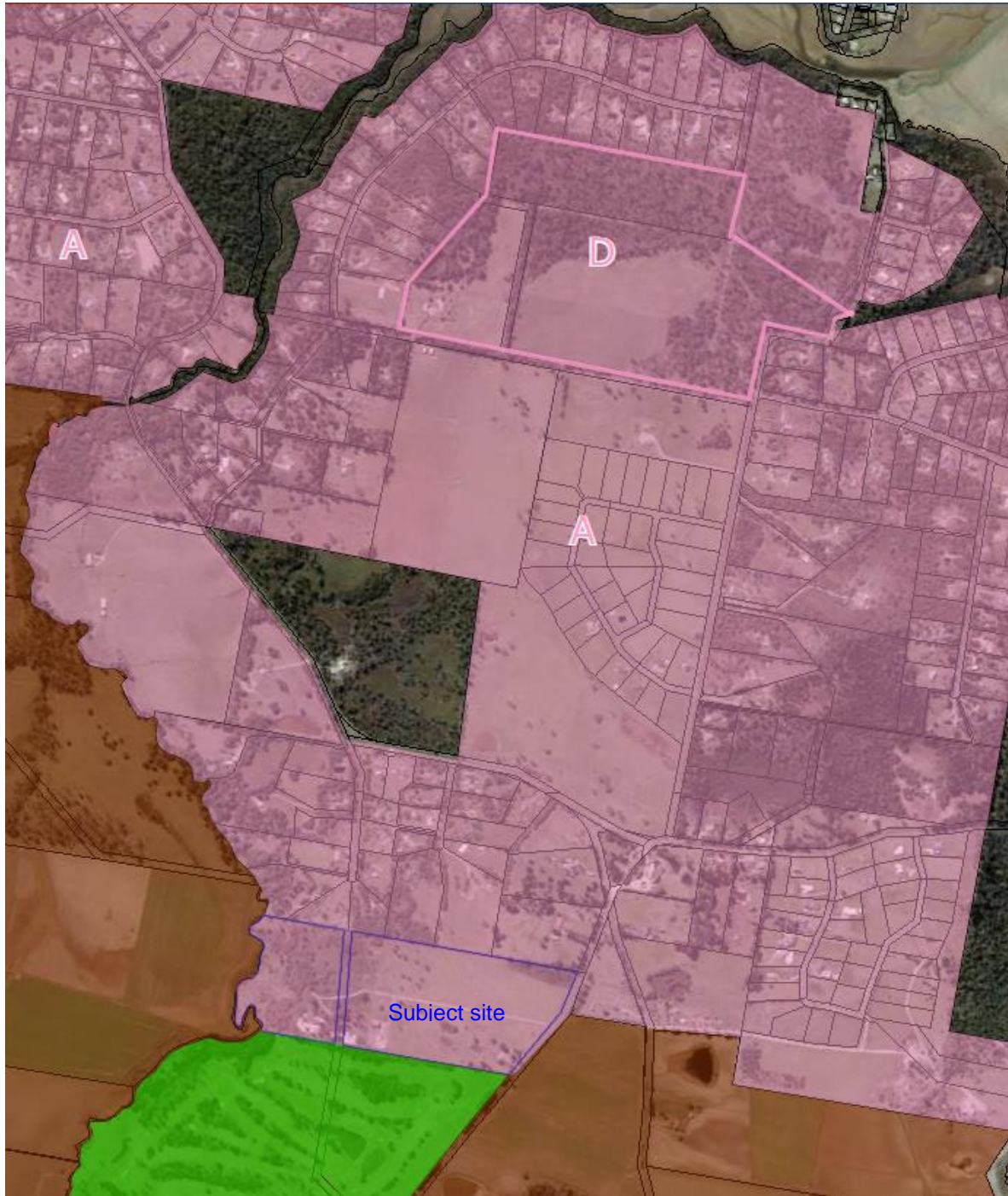


FIGURE 2: APPLICATION OF RURAL LIVING ZONE A TO DESIRED AREA¹

¹ The Rural Living Zone A is shown for all land existing under the current Planning Scheme and proposed as part of the draft Latrobe LPS process via representations

Latrobe Council is taking a conservative approach in applying the Rural Residential Zone D due to a lack of knowledge of supply and demand for Port Sorell. The Section 35F report states that Council will undertake a separate project to determine residential land demand; however, no timeframe is indicated. The enclosed Port Sorell Supply and Demand analysis prepared by Veris concludes that there is insufficient supply to satisfy demand for rural residential type properties. Property sale data in Squeaking Point show that the Moorings Drive subdivision was sold out in 2020 (except for four properties still in ownership of the developer) and Elphin Drive was fully sold at the beginning of 2022. Real estate agents advise that sales within the rural residential market are slowing down only to the fact that no supply is available.

The subject site would allow for a maximum yield of 20 lots (18 additional residential lots). Veris has submitted additional justification for other clients resulting in a potential of 71 additional rural residential lots, if it is decided to provide the Rural Living Zone A for all of these properties. There is therefore a potential for 87 additional lots if all land identified within the PSSP and subject to a representation in regard to the draft Latrobe LPS are zoned Rural Living Zone A. The first scenario would result in a forward supply of 6.7² years while the second scenario results in a slightly higher forward supply of 7.3² years. Allowing for the subject site to be included as Rural Living Zone A land would result in a forward supply of 7.3² years (7.9² years respectively), which is still below common practice strategic planning targets of 10-15 years.

Considering the need for a substantial update of the Port Sorell Strategy and the Cradle Coast Regional Land Use Strategy, a forward supply of land available for immediate development of around 7 years is considered appropriate to allow the continuous growth of the locality.

We herewith request to consider the application of the Rural Living Zone A to land identified as 345 Squeaking Point Road, Thirlstane (FR227658/1).

Your sincerely

Jana Rockliff

Town Planner

² Based on population growth scenario 2 including land identified as unconstrained only

***Cassinia rugata* at the Carter Property: 345 Squeaking Point Road, Thirlstane, Tasmania.**

Phil Collier, 26 July 2012

Background

Cassinia rugata was confirmed in Tasmania by an email from Dr Tony Orchard on 9 April 2010, on the basis of pressed specimens collected at the *Collier/Garnett property* at 241 Parkers Ford Road, Port Sorell (Appendix 1). This prompted a search of roadsides nearby to find any additional populations. Observations of the few plants that were found are included in the Natural Values Atlas¹. The only natural habitat that looked promising for a larger additional population was the *Carter property* at 345 Squeaking Point Road, with some plants possibly being seen in flower over the fence in February 2011.

At the time *Cassinia rugata* was discovered in Tasmania, it was listed as a threatened species nationally because its only known population at Portland, Victoria was reported to be small and declining. There is a recovery plan for the population at Portland².

In July 2012, with earthworks and other development activity obviously underway at the Carter property, a representation was made to the federal Department of Sustainability, Environment, Water, Population and Communities advising them of the earthworks and the known plants on the roadside. Subsequently one of the land owners, Matt Carter, spent some hours researching and searching for *Cassinia rugata* plants on his land. Matt later contacted me for assistance with his search.

Prior development works at 345 Squeaking Point Road

Matt Carter reports that he has been working towards clearing most of the land for his own purposes. The front of the land adjacent to the road is flat and supports a low-growing mixed sedge and heath community. Matt reported that he had arranged for the sedge and heath country to be slashed in December 2011, and subsequently sprayed with glyphosate earlier in July 2012. There is ample evidence of the slashing, with much slash debris still in place. The remaining slashed vegetation is approximately 200 mm tall on average. There is no obvious evidence of the spraying at this stage. Even if the spray is 100% successful for exposed plants, there are likely to be many plants under the slash debris that had limited access to the spray.

***Cassinia rugata* in Tasmania**

Appendix 2 discusses the known habitat and response to management actions for *Cassinia rugata* in Tasmania.

Survey for *Cassinia rugata* 19 July 2012

I met Matt Carter at 8am on 19 July 2012 to assist Matt find plants of *Cassinia rugata* on his land. We walked together through the more open areas of the Carter property. Walking away from the road in a westerly direction, the land starts to become better drained with denser shrubbery and bracken

¹ www.naturalvaluesatlas.tas.gov.au

² www.environment.gov.au/biodiversity/threatened/publications/c-rugata.html

understory in regenerating Eucalypt woodland. The drier shrubbier habitat is less suitable for *Cassinia rugata*. We returned towards the road near the northern boundary, which is approximately where plants were possibly seen over the fence in February 2011. This is where we found evidence of plants that were recovering well from the December 2011 slash. We walked through this population east-west several times and GPS-located plants and plant clusters, shown as yellow waypoints in Figure 1.



Figure 1 Satellite image of the Carter property, showing track walked (white line) and locations of *Cassinia rugata* plants seen (yellow GPS waypoints). An agreed set aside area is shaded with blue.

Matt and I agreed that there are approximately 100 plants in the vicinity of the GPS waypoints. This makes this population important in the Tasmanian context, where there are approximately 300 known plants on the Collier/Garnett property and very few others known on nearby roadsides. Matt asked me to include suggestions about how to manage the population of *Cassinia rugata* that was found on his property, which I have done in the next section.

Avoiding significant impact on the Carter population of *Cassinia rugata*

Suggested methods to manage the population of *Cassinia rugata* on the Carter property include:

1. Define an area that includes all of the plants discovered. Matt has agreed that the area shaded blue in Figure 1 can be set aside from further development. This area of approximately 7500 sq. m. (maximum dimensions 185m x 50m) covers all of the known plants with a minimum buffer of at least 7m from the boundary. The proposed set aside area is further specified in Appendix 3.
2. Create a permanent managed boundary that can be used as a fire break. Matt has agreed to slash a boundary of approximately 3m width within the perimeter of the set aside area.
3. Should new plants of *Cassinia rugata* be discovered outside the set aside area, there is scope to transplant them into the area near the roadside, where there has been some soil

disturbance to assist the Council with improved road drainage. Matt has access to excavators that can move 3 cu. m. of soil with plants to be relocated.

4. Should the recent spraying be highly effective, regeneration of the area may be assisted by a burn early this coming spring to encourage germination of the soil seed bank. Such a burn will not threaten the surviving *Cassinia rugata* plants, given past experience.
5. Should the spraying be less successful, it is desirable to allow *Cassinia rugata* plants to regrow and seed naturally before an initial burn.
6. Thereafter, a burn frequency of about 5 to 10 years is desirable to avoid growth of larger trees and shrubs that would shade out the *Cassinia rugata* population.
7. Ongoing monitoring for weed infestations or changes in hydrology of the soil are desirable. Some of the *Cassinia rugata* plants on the Collier/Garnett property are growing amongst some herbaceous weeds near a fence line, with no noticeable impact on their survival. However, it is desirable to limit incursions by herbaceous weeds. Any shrubby weeds that establish within the set aside area should be removed immediately by cutting and pasting, especially gorse which is present on a nearby roadside. The flat landscape and humus rich soil will probably be able to sustain its natural seasonal wetting if non-essential drainage is avoided in the immediate vicinity.

Should the spraying be so successful that little natural regeneration of the area occurs following a burn; there are options for rehabilitation that would need to be considered at that stage.

Concluding remarks

In an ideal world, the existence of a threatened plant species should be brought to the attention of a landowner before they develop their own plans for their land. Matt is to be commended for his patience and interest when advised that *Cassinia rugata* was likely to be on his land while conducting his earth works. With an adequate area of land set aside (Figure 1 and Appendix 3) and modest amount of on-going management, there is a high likelihood that a significant population of *Cassinia rugata* can be sustained into the future. It is through these modest but highly significant contributions from interested landowners that we will be able to sustain our natural heritage.

Appendix 1 Email confirmation of *Cassinia rugata* in Tasmania, 9 April 2010

Hi Phil

Thank you very much for sending me the *Cassinia* specimens. They are remarkably variable for such a limited population. However I think that there is no doubt that they represent a new and important record of *C. rugata*.

I have tried hard to make them stand alone as a new taxon, but I think the best solution is to include them in a slightly expanded concept of *C. rugata*. Some, but not all, have narrower leaves (others match the Vic material well in this regard), and some lack the slightly spreading tips to the involucre bracts, and not all have the bracts arranged in \pm vertical rows. The hairs on the upper leaf surface vary from coarse (as in my illustrations) to quite fine. However, I think these kinds of variation can be accommodated in a slightly broader *C. rugata*.

The good news of course is that the species is now a little more secure. Last time I looked at *C. rugata* near Portland the populations seemed to be struggling. It would be great if you managed to find this species in other localities in Tas, although I guess you have already looked.

I will lodge the material you sent in CANB.

Best wishes

Tony Orchard

Appendix 2 Habitat and management of *Cassinia rugata* in Tasmania

The evidence from the Collier/Garnett property is that *Cassinia rugata* favours open situations, often in places that are seasonally inundated with shallow water. We classify this habitat as the vegetation communities (TASVEG 1.0³) SHL *Lowland sedgy heathland*, extending into regenerating DOV *Eucalyptus ovata forest and woodland*, and the edge of ASF *Freshwater aquatic sedgeland and rushland*. A few plants of *Cassinia rugata* that have been shaded more deeply by blackwoods in *Eucalyptus ovata woodland* have been seen to become leggy and die.

As with most organisms, *Cassinia rugata* does not occupy all of the apparently suitable habitat. It tends to grow in a mosaic of dense clusters, looser clusters and isolated plants (Figure 2). The most vigorous plants are shrubs with numerous branches at ground level, forming a dense rounded canopy 1 m to 1.5 m tall. Less vigorous plants can have a few leggy branches. Plants are easiest to see when flowering in February. In particular, with a low light behind the observer the white flower heads (Figure 3) appear to glow. By mid-winter flower heads are finished, many leaves are browning off, and the plants tend to have an unhealthy scruffy appearance, only to burst into life again the following summer.



Figure 2 Massed flowering of *Cassinia rugata* plants February 2011

The management plan at the Collier/Garnett property requires burning/slashing of open SHL communities every 5 to 10 years and DOV communities every 20 to 30 years. Burning of SHL commenced in 2007 before *Cassinia rugata* was identified on the property. Most of the densest clusters of *Cassinia rugata* plants were burnt in 2007, with no pre- or post- survey work. However, plants that survived the burn re-grew rapidly from the rootstock and have flowered successfully for several years since 2007.

³ www.dpipwe.tas.gov.au/inter-nsf/ThemeNodes/LJEM-6PE7J4?open



Figure 3 *Cassinia rugata* flower head February 2011

In 2011, for the first time since *Cassinia rugata* was identified with certainty, some scattered plants were in burn areas and therefore deliberately burnt. We have been monitoring the response of some of these plants to the burn. Many plants regenerated vigorously from the rootstock (Figure 4), but fresh stems are subject to heavy grazing. The old dead branches, which can form a tangled mass at the base of previously vigorous plants, afford some protection from grazing. Presumably as the surrounding vegetation also grows up, grazing access will become more limited and branches will again grow to maturity.

We also monitored for seedling germination, to the extent that is feasible in an extensive native habitat. Seedlings (Figure 5) were seen in some numbers (30+) surrounding two of the burnt plants. Over time these thinned out from natural causes. It is too early to determine whether or how many seedlings will reach maturity. It is the seedlings that grow apart from existing plants that are likely to be of more value to expanding the population, but the observed germination pattern goes some way to explaining why there are dense clusters of adult plants in some instances. Given the typical daisy fruit of *Cassinia rugata* with a pappus that should enable the wind to spread seeds far and wide, it is surprising that germination is concentrated around adult plants.

The observations to date, not only suggest that disturbance is necessary for the health of *Cassinia rugata* plants; it also suggests that adult plants are resilient to disturbance from burning and slashing. Plants regenerate vigorously from burnt rootstock. They also regenerate from slashing as seen at the Cater property. More systematic work would be useful to determine the proportion of mature plants that survive disturbance and whether/how many seedlings survive to maturity.



Figure 4 Regeneration of *Cassinia rugata* plant in August 2011, following a burn in April 2011



Figure 5 *Cassinia rugata* seedling

Appendix 3 Specifications of the set side area

The set aside area aligns with the northern and eastern boundaries of the Carter property, as shown in Figure 6.

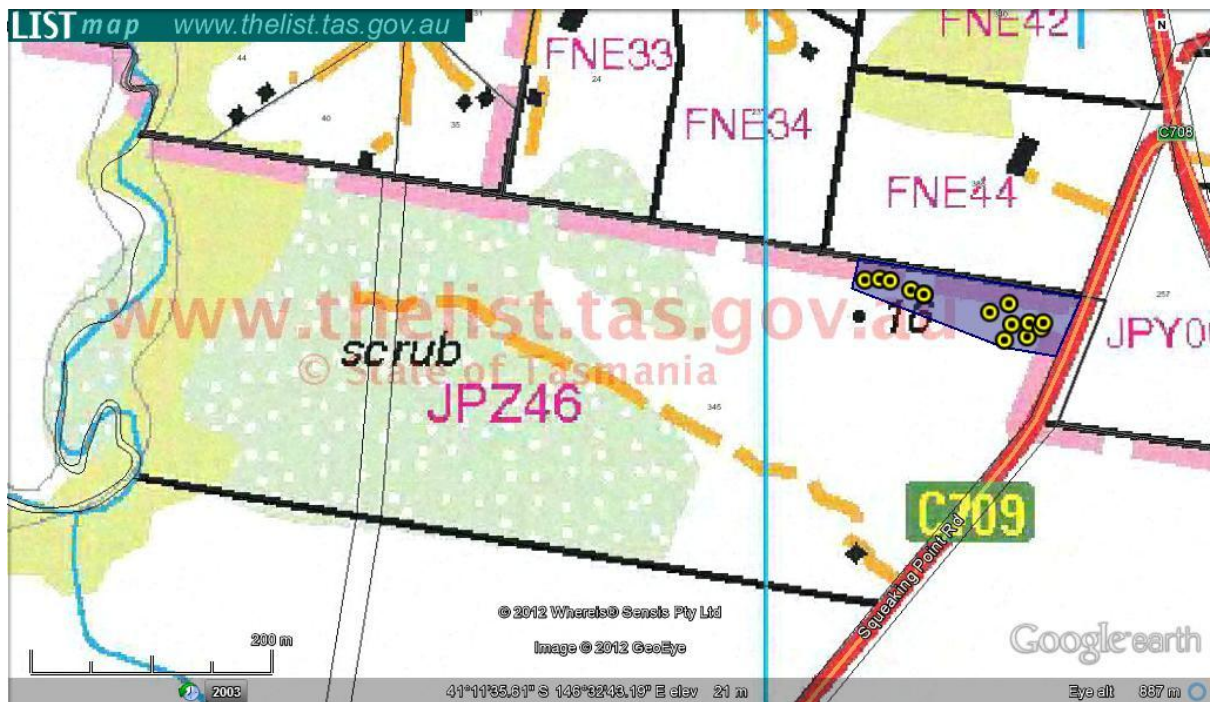


Figure 6 Set aside area with property boundary from thelist.tas.gov.au shown.

The set aside polygon is bounded by the following coordinates:

- S41 11 34.0 E146 32 59.9 (north east corner on property boundary)
- S41 11 35.6 E146 32 59.0 (south east corner on property boundary)
- S41 11 35.3 E146 32 57.2 (southern side of set aside area)
- S41 11 33.7 E146 32 51.8 (western side of set aside area)
- S41 11 32.9 E146 32 52.0 (north western corner on property boundary)

A Google Earth data file is supplied separately that includes all the details shown in Figure 1 and Figure 6.