

Hearing for Tasmanian Planning Commission/Kingborough rezoning

While I commend the motive underpinning the zoning of parts of Kaoota/Allen's Rivulet as Landscape Conservation, I hold that the restrictions placed by this zoning classification is counterproductive to the aims of the zoning.

There are no broad-brush classifications and systems of control that are effective in all situations. The varied and fragmented topography of Tasmania, and of individual ecosystems within Tasmania require particular and individual land management. James Boyce, an historian, mentions the impact of Tasmania's fragmented topography on the development of the Tasmanian character. (Van Diemen's Land 2010). How more so, the impact on land management.

We know, and authors such as Charles Massey (Call of the Reed Warbler 2020) validate that flora and fauna are continually adaptive. At Kaoota we have seen agapanthus, previously thriving almost as weeds, now eaten to the ground by our local pademelons and wallabies. In other areas agapanthus still thrive on roadsides. This is only one trite example of very local differences. Each local ecosystem needs sensitive and individual attention. To be effective, there are no short-cuts; to broadly classify is to be ineffective.

The main argument of the paper I submitted to the Tasmanian Planning Commission is that in lieu of an apex predator, local herbivore fauna numbers are expanding exponentially, causing de-vegetation of our local landscape. Reading around regenerative agriculture on conservation (Yellowstone Park experiment, 1995; Charles Massey, 2020; Matthew Evans, 2022; Sam Vincent, 2022; Gabe Brown, 2018) stable vegetative cover is essential for landscape health. This means, among other factors, that the control of grazing by herbivores, whether native or introduced, is essential.

Vincent (My Father and other Animals 2022) quotes Aldo Leopold (A Sand County Almanac 1944 p129)

"The cowman who cleans his range of wolves does not realize that he is taking over the wolf's job of trimming the herd to fit the range. He has not learned to think like a mountain. Hence we have dustbowls, and rivers washing the future into the sea."

Prior to 1991, with the introduction of Gun Laws in Tasmania, and 1996 National Firearms Agreement, much of native herbivore management was done by hunter/gatherer methods. These methods are now not so commonplace. An alternative solution for controlling herbivores is fencing.

Charles Massey notes (Call of the Reed Warbler, p301) that conservation is never enough. The utopian landscape, the native landscape that was is gone and irretrievable. The key is to develop a functional landscape. He also states we need to avoid the illusion that we can induce stability and permanence; we need to embrace the "inexorable cycles of transformation."

This brings me back to our local fauna causing massive de-vegetation of our hillsides in Kaoota. A walk along the Tramway track will illustrate this. The inexorable cycle of change this leads to is

bare earth, erosion, tree fall particularly of the shallow-rooted Silver Wattle (*Acacia dealbata*), and continued erosion. Erosion is loss of soil, which in turn leads to no absorption of water when it rains, resulting in lots of runoff and increased chances of flooding down stream.

In our self-regulating universe this is being countered by pioneer plants that the padymelons and wallabies will not eat, that is, by foxgloves and thistles which are toxic non-native plants. Landowners are encouraged to eradicate these, which leads to more bare earth subject to more degradation.

By rezoning Kaoota/Allen's Rivulet as Rural or Rural living the criteria of use permit fencing and grazing. This would result in people living on these properties that see value and return in managing ground cover and judicious eating of that ground cover. Where there is ground cover, even grass, soil is retained, water can penetrate the soil rather than run off. Erosion is stilled and tree fall is minimized. Vincent (2022) says

“Many people I knew held that farming was inherently destructive, and “nature” was what happened if you stepped away. (p254)

The reality is that stepping away is abandoning our responsibility to our unquestionably compromised ecosystem.

I would urge the Tasmanian Planning Commission to consider wholistic land care/social response to rezoning, taking into consideration the benefits of rural land use and the personal agency and responsibility for improvement and rezone Kaoota and Allen's Rivulet, and many other properties potentially zones Landscape Conservation as Rural or Rural living.

Thank You.

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Submission to Kingborough Council re: Re-zoning

Abstract: I am concerned that the strategies outlined under the Land Uses in the Landscape Conservation Zoning will not accomplish the stated purposes of protection and conservation of landscape values but rather lead to a further degradation of these landscape elements. I will argue that the lack of an apex predator makes the current, and further degradation inevitable. I will further argue that the strategies of management required to protect, conserve and even enhance landscape elements will more easily fall under the Rural Living Zoning.

Landscape Conservation Zone

22.1 Zone Purpose The purpose of the Landscape Conservation Zone is:

22.1.1 To provide for the protection, conservation and management of landscape values.

22.1.2 To provide for compatible use or development that does not adversely impact on the protection, conservation and management of the landscape values.

No Permit required:

Natural and Cultural Values Management Passive Recreation

Permitted:

Residential

Minor Utilities

Discretionary:

Domestic Animal Breeding, Boarding or Training

Resource Development

Rural Living Zone

11.1 Zone Purpose The purpose of the Rural Living Zone is:

11.1.1 To provide for residential use or development in a rural setting where:

(a) services are limited; or

(b) existing natural and landscape values are to be retained.

11.1.2 To provide for compatible agricultural use and development that does not adversely impact on residential amenity.

11.1.3 To provide for other use or development that does not cause an unreasonable loss of amenity, through noise, scale, intensity, traffic generation and movement, or other off site impacts.

11.1.4 To provide for Visitor Accommodation that is compatible with residential character.

No Permit required:

Natural and Cultural Values Management

Passive Recreation

Residential If for a single dwelling.

Resource Development If for grazing.

Utilities If for minor utilities.

Permitted:

Residential If for a home-based business.

Visitor Accommodation

Discretionary:

Business and Professional Services If for a veterinary centre. Community Meeting and Entertainment If for a place of worship, art and craft centre or public hall.

Domestic Animal Breeding, Boarding or Training

Discussion:

1.

The Landscape Conservation mentions the need to manage in the purposes of the Zoning. The Rural Living Zone implies management in the section “no permit required”. Both Zonings also mention the necessity of preserving landscape values.

Landscape conservation Zone:

22.1.1 To provide for the protection, conservation and management of landscape values.

Rural Living Zone:

11.1.1

(b) existing natural and landscape values are to be retained.

The particular Landscape values under consideration by the Zonings are not explicitly identified. These are some Landscape Values that I will be addressing as in need of conservation and management:

- Land stability, ie not erosion
- Vegetative cover
- Ecosystem balance

I am sure that those designing and quantifying the zonings have put in a lot of effort and did a great job on a difficult task. However, I find the zoning criteria inadequate for what I am seeing in the Kaoota environment. I suggest we need to be careful to pick the best fit for the current situation.

2.

The Current Situation:

I have lived in Kaoota for 12 years, and have visited a local property regularly since 1960.

My father was “bushed” on that property in the mid 1960’s, darkness having fallen while he was outside. A group of men went looking for him. Dad had lit a fire, but the searchers almost missed him because from 10 yards away neither the fire nor my father could be seen.

This was a landscape with a high level of vegetative cover, but barren of our common herbivores. It was not a balanced landscape. The 1967 bushfires brought this forcibly to public awareness.

When I looked at my block in Kaoota in 2012 there were numerous native herbivores. There was a thick understory of young and mature senecio (fireweed) and mature Ozothamnus (Summer Snow). These were the dominant features of the understory. The upper canopy was primarily Acacia Dealbata (Silver Wattle). There was some very young Acacia Dealbata in an area that had been clear 2-3 years previously, according to the Council geographical overlays. The Environmental Officer at the time was surprised that the paddock was now covered in trees. To lay a water pipe from the existing dam was a major task in “bush bashing”. When I put in my building application, fire safety was a major concern.

If a person now takes a walk along the Kaoota Tramway track, thirteen years later, the change in the landscape will be evident. The canopy is still intact. Below the canopy the ground is bare. Some walkers on the track have expressed surprise and concern at the change. Following is a photo taken in my bush 7th August, 2025.



Neither the Tramway track, nor this section of bush have been managed for rural activities. They have basically been left for nature to take its course.

What has happened?

The photo shows a Landscape out of balance. Now there is an over-abundance of herbivores. The herbivores have eaten out the ground cover and the undergrowth. Any new green shoot is immediately consumed. The herbivores are undernourished and thin. There is an over-abundance of herbivores because there is not natural balance in our environment. Our environment is lacking an Apex predator.

Prior to European settlement the indigenous people of Tasmania /Lutruwita managed the landscape with fire, to control vegetation, and hunting to control the fauna populations. The Thylacine was still a major element in the ecosystem. Together, the Thylacine and the indigenous human population were the Apex predators that kept the landscape in balance.

I would like to refer to the Yellowstone Park experiment. (www.yellowstonepark.com) Prior to 1995 there was a situation of inadequate predation on elk, which browsed on aspen and willow. Elk decimated the park, almost extinguished the beaver population, and caused erosion and flooding. In a desperate bid, an experiment was launched in 1995 to reintroduce grey wolves. The results were spectacular. Elk populations declined and the elk gene pool improved as the predators took out the weaker elk individuals. Less herbivores meant that the vegetation had a chance to regrow as the wolves kept the elk moving. Beavers returned. They built dams which held back flooding and enabled moisture to penetrate into soil, extending the riparian system sideways. This meant that there was moisture available for vegetative growth, therefore less erosion and less flooding.

([Wolf Reintroduction Changes Yellowstone Ecosystem](#) 231214 [Brodie Farquhar](#) Updated Jun 22, 2023

www.yellowstonepark.com

There is an understanding in the Ecological Scientific community that Apex predators are essential to the health of the ecosystem. [Status and Ecological Effects of the World's Largest Carnivores | Science](#) 18 August 2025.

Current ecological knowledge indicates that large carnivores are necessary for the maintenance of biodiversity and ecosystem function.

And [Living alongside predators 231224 - Search](#) Dec 19, 2024

big predators are necessary to maintain healthy ecosystems. For instance, wolves and their co-predators could help solve Scotland's biodiversity crisis and bring balance back to Scottish ecosystems by regulating populations of deer, foxes and badgers. In doing so, big predators may also contribute to the fight against climate change by enhancing [carbon storage capacities](#). Overpopulation of herbivores can deplete plant species and trees which capture carbon dioxide emissions responsible for global warming.

We are in a similar situation to Yellowstone Park prior to 1995. With no undergrowth the landscape is ripe for massive erosion. With erosion and less soil, there is less water penetration into the soil meaning more water flows down to low-lying areas which are then prone to flooding. Water that travels faster will drag away more soil.

Looking further ahead, less soil means more tree-fall , particularly with Acacia having very shallow roots. This will lead to loss of canopy. Ideally this would encourage new tree seedlings, but with loss of soil and an abundance of hungry herbivores this would be unlikely to occur. The only things to grow would be those plants that are unpalatable to our native herbivores, such as thistles and foxglove. Thistles and foxgloves are pioneer species that take advantage of open spaces and degraded soils. Kingborough is seeing a lot of thistle and foxgrove infestation. Luckily both thistles and foxgloves have good root systems, which will retain soil and prevent erosion. However, they are declared environmental weeds, and people are encouraged to get rid of them, once more leaving the soil vulnerable.

Our native herbivores eat grass in the same area every night, leading to "Wallaby Lawns: This is called "set stocking" in rural terminology. The grass does not have a chance to grow shoots. Consequently, the roots die back to roughly the same length as the shoots – maybe 2 cm. In a lot of places, the grass has disappeared completely, leaving a ground cover of lichen and moss. In summer the lichen and moss die back, leaving a bare space. This leaves areas of land vulnerable to erosion as well.

3.

Land management in lieu of Apex Predation:

In the light of current land degradation without predation the options available to the landowner is either culling or fencing.

Culling is done on some rural properties. It could conceivably be allowed under “Rural Living” zoning. Could this be included in “Landscape Conservation” zoning? Culling would require a gun licence, and sufficient acreage to make shooting allowable. It would not fit with some properties. Some property owners may not be willing or able to take out a gun licence which would limit their ability to use culling as a management tool.

Fencing is another option. Fencing is integral to “Rural Living” zoning. Could it be included in “Landscape conservation” zoning?

Following is a photo of a bank that needed stabilizing. I had left it for a few years, but the bank was beginning to erode, and nothing grew on it. I fenced herbivores and planted *Muehlenbeckia gunnii* (Maquarie Vine), a creeper. The bank has regenerated with *Ozothamnus*, *Senecio*, some *Acacia* and lots of grass.



Fencing has further issues. Once an area is fenced, and vegetation grown, the vegetation needs to be managed in the light of fire safety. Areas could be physically mown and timber harvested. This would require machinery and a topography that allows the machinery to be used safely.

Introducing animals would enable judicious management of vegetation, as well as enabling the micro flora and fauna in the soil to thrive. This would increase carbon in the soil, soil fertility and retention of water in soil. Native species could be used. There would be difficulties in maintaining a stable native fauna population in an enclosed space. Native herbivores reproduce rapidly once they have adequate feed. Regular culling would be essential. Again, gun licences, or people with gun licences would need to be employed.

Non-native fauna, which has been domesticated, is easier to handle in fertility control and culling. They are also more accepted as produce.

Fertility management and culling would increase some landscape values such

- Land stability, ie not erosion
- Vegetative cover
- Ecosystem balance

but would more readily fall within “Rural Living” than “Landscape Conservation”.

Council members may be aware of the recent rise in awareness of Regenerative Agriculture. Permaculture began a change in land use awareness in the late 1900’s and early 2000’s. David Holmgren’s book, *Permaculture, Principles and pathways Beyond Sustainability* came out in 2002. This was followed by the innovative work of Gabe Brown, *Dirt to Soil* in 2018, Charles Massey, and Australian *Call of the reed Warbler* in 2020, and Matthew Evans in Tasmania, *Soil* in 2022.

Matthew Evans presents a lot of studies on developing soil biomass and the positive effects of that. Charles Massey includes the spectacular regeneration of native vegetation and landscape following Regenerative farming practices. Including water penetration into soil, return of vegetative species that had now been seen for many years, and return of native fauna. He particularly noted the return of the Reed Warbler to an area where it had not been observed for many years.

This development in thinking is very recent in the general consciousness and may not have been taken into consideration when the new Zoning structures were being developed. This new understanding needs to be taken into consideration with the re-zoning process.

“Rural Living” zoning in today’s agricultural scene would be stepping into an era of agricultural change that endeavours to enhance natural habitats and environment in balance with food production. Regenerative agriculture results in the conservation of soil, the return of waterways, the return of long unseen flora and fauna, water retention in soil rather than run-off and carbon sequestering in soils.

Under “Rural Living” Regenerative Farming practice, even on a small scale would enhance the Landscape values of:

- *Canopy cover*
- *Understory species* regeneration
- *Plant diversity*
- *Bird diversity as a result of plant diversity.*

Fencing needs money and energy. Such an expenditure of money and energy from a purely altruistic motivation of landscape conservation would be nice but would be unlikely. The outlay of finance and energy is more likely where there is a material return to self and family.

To summarise: Sadly, one size does not fit all and the unique issues in Kaoota do not easily fall into the categories specified in the Zoning document. The topography of Kaoota would suggest Landscape conservation, but Landscape conservation needs management in lieu of an apex predator. Culling or fencing are useful management tools. Both culling and fencing, with attendant management needs fall more easily into “Rural Living” than “Landscape Conservation” zoning categories as they currently stand.

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(for the Zoning Hearing, November 11, 2025, 10 am. No. 383)