From: Annette Ottway [redacted] >
Sent: Friday, 1 May 2026 3:29 PM
To: Kingborough LPS
Subject: submission [redacted]
Attachments: TPC letter NO LCZ - Snug Tiers 212530-1.docx; Snug Tiers Settlement by lot - MAP A.pdf; Snug Tiers Living Intent - MAP B.pdf

To whom it may concern,
I have attached my father Iain Freeman, [redacted], Snug submission for your review.
Kind regards
Annette Ottway
[redacted]
Snug, Tasmania 7054
[redacted]

Name(s)	Iain Hamilton Freeman
Date	29th April 2026
Property Address	[redacted] Snug Tasmania 7054
Requested Zone	Rural Living Zone

To the Tasmanian Planning Commission,

Hello, my name is Iain Freeman. Thank you for the chance to speak about my property at [redacted], Snug Tasmania 7054.

I object to its rezoning under the Kingborough Draft LPS and/or IreneInc review to the Landscape Conservation Zone (LCZ). Applying LCZ is inconsistent with section 34 of the Land Use Planning and Approvals Act 1993 (LUPAA), the LPS Section 8A Guideline No. 1, and the Southern Tasmania Regional Land Use Strategy (STRLUS).

Rural Living Zone (RLZ) D would be more suitable. I respectfully ask the Commission to apply this zone, in line with the original purchase, zoning allowances, and the site's current or future residential use. RLZ is also proposed for adjoining properties at [redacted].

The current dwelling which was built in 1994 and the shack which was built in 1969 and 2 sheds.

This property was bought by William Crosby in 1958 as a family home for himself and his two daughters.

In 1964 he gave the property to his youngest daughter Sandra Freeman as a wedding gift. He then purchased the property next door.

Sandra and I lived in this house until it burnt down in 1967. Improvements that had been made was a second level was added.

We built a shack on the sight of the house in 1969.

In 1994 we built the house which is here now.

Sandra died in 2011 and I inherited the property. Sandra's ashes are scattered here.

I still live in the house and my son Ken will inherit the house one day and he should have the right to continue to use this land as we have always done.

In the past we have farmed cattle, pigs and chickens for our own meet/eggs. We have fruit trees and a vegetable garden. I will continue to have fruit trees and vegetables for my food.

Prior to in 1967 this land was used for Canes and milling.

The original homestead burnt down in the early 1900's its location is West, South West of the current house.

This land was devastated by fire in 1967. The landscape so scared that seed drops by air were required to regenerate the vegetation. It was a rough guess at what proportion of species of seed needed to be dropped and what proportion would grow.

Our family has continued to maintain this property by burn offs, keeping the under growth down and land cleared around the out buildings.

We maintain the logging tracks as they make good fire breaks.

Due to the seed drops the farmland is mostly bushland with some vegetation. As the wattle trees come to the end of their life-span we fall the ones that become dangerous and could injure someone or damage property. We use this wood as firewood. We also use the trees that fall across the tracks or into the paddocks for firewood.

The shack that was built in 1969 and the house have always been seen from Kingston, Margate, Bruny Island. It is our view which has changed over the years as all the big housing estates have been built. We have managed this land well under previous zonings and not made an impact on the environment unlike the massive housing estates that we have watched grow over the years.

The sight of the original house and a mill track on the left. The track on the right was put in after the house burnt down.

While I agree that Tasmania's landscapes should be protected, I believe it can be done best through RLZ as it has been done historically through ELZ and Rural Residential zonings. Rezoning to LCZ would harm our continuous use of the land as allowed when purchased.

LCZ DOES NOT COMPLY WITH LUPAA ZONE GUIDELINES

Section 34 of LUPAA says the Commission must check if the LPS meets the Act's criteria, including zone guidelines. LCZ 4(a) states that LCZ should NOT be used where the land's '**priority is for residential use and development'**. The guidelines say LCZ is not for large residential lots 'characterised by native vegetation cover and other landscape values.'

Originally, my property was zoned Rural Residential. My property is currently zoned Environmental Living (ELZ). The **primary use and strategic intention of the land is and has always been residential**. It has a dwelling built in 1995, has been occupied continuously, and is serviced by roads, electricity, phone no sewage, water or rubbish removal. There's no evidence the land's primary use is anything other than residential.

LUPAA guidelines also state LCZ is not a replacement for ELZ. The priorities don't match: ELZ Living priority permits dwellings, but LCZ prioritises conservation with discretionary dwellings.

In correspondence with the Planning Authority, the TPC noted that the LCZ "appears to have been used …to replace ELZ", a policy or strategy shift which should be 'comprehensively justified'. Neither the draft LPS nor

IreneInc's review has provided detailed, site-specific reasons for changing my land's priority. They based their decision on general landscape values and rural settlement judgments, neither had community input.

LCZ DOES NOT COMPLY WITH LUPAA OBJECTIVES

LUPAA Schedule 1, Objective (b), aims for 'fair, orderly, and sustainable' land use. Applying LCZ conflicts with this objective. It is unfair to remove permitted residential use; applying LCZ represents a **net reduction** in existing land use rights. Most Tasmanian councils moving to the Statewide Planning Scheme applied the LCZ sparingly or not at all. Only a few used it moderately or heavily. Most councils (such as Tasman) translated ELZ directly to the Rural Living Zone, yet IreneInc chose as their model three councils that applied LCZ heavily.

Many councils, including Kingborough in 2019, recognised that LCZ could lower property value, affect insurance and finance, and prevent future dwellings on empty blocks – not meeting the goal of sustainable development that supports communities to provide for their **social**, **economic** and cultural well-being...' (clause 1 (a), Schedule 1 – Objectives).

RLZ IS THE APPROPRIATE ZONE

RLZ Guideline RLZ 1(a) suggests the RLZ should be applied to residential areas with larger lots used for residential and lower order rural activities, while prioritising residential amenity. This fits my property.

RLZ Guideline RLZ 2(b) states RLZ may be applied to ELZ land where the primary strategic intention is for residential use in a rural setting and a **similar** minimum allowable lot size is being applied. My property's size of 10.89 ha aligns with RLZ D with a minimum lot size of 10 ha.

THE IRENEINC EVALUATION PATHWAY (DECISION TREE)

IreneInc uses a decision tree to decide zones. On Day 2 of the review hearing, the Commission was told that it's a tool, not a rule [Kate Heckelmann, 05:53:00], and alternatives can be used with good evidence. Even so, applying the evaluation pathway correctly, my property meets the RLZ criteria rather than LCZ.

EVIDENCE OF STRATEGIC INTENT FOR LIVING

Both the original LPS and IreneInc's report lack clear definitions of "primary strategic intent." They ignore existing rural-residential settlements, historical land use, cultural attachment, community ties, and intergenerational living. Neither STRLUS nor the Kingborough Strategic Plan restrict rural living growth. Past land allocations, subdivision approvals, and development applications show that residential use is the 'strategic intent' of the land.

The review for my locality (Snug/Coningham) is stated as generally meeting strategic intent for living. My property has an established dwelling, outbuildings, and signs of residential activity.

EVIDENCE OF RURAL LIVING SETTLEMENT

IreneInc's review states that the Snug Tiers community meets the 'strategic intent for living' because there is 'evidence of residential uses scattered throughout'. However, Rural Living Settlement status has been mostly denied, with the report citing a 'lack of consistent subdivision pattern with lots of the size which would contribute to a rural living settlement'.

This assessment appears biased, primarily due to two judgments. First, it favours smaller lot sizes, disregarding RLZ subcategories that limit subdivision of lots under 20ha and also minimises development on larger lots through needs of access and services (note: there is NO maximum lot size in RLZ).

Secondly, the 'consistent pattern' is only recognised if it resembles urban cul-de-sacs or road clusters, ignoring rural and lifestyle properties that are naturally sited around topographical features, inherited large lots, or purchased with future rural living in mind. For example, in Snug Tiers there's a clear pattern of large lot subdivision facing into the valley, on a Northwest to Southeast alignment around the topography.

These biases overlook the fact that residents live just minutes from Snug township, where they shop, support local businesses, send children to school, recreate, and work. The reliance on a desktop analysis, which can't see beyond tree canopies and often lacks on-the-ground insight, leads to subjective judgments about rural settlements. For example, the IreneInc report notes that three adjoining properties on Snug Tiers Road display 'a consistent pattern of rural living,' as does my property, yet it is still proposed to be part of the LCZ.

Without applying rural living settlement criteria consistently and with ground-truthing, the evaluation then fails to consider whether landscape values can be managed through planning codes **nor recommends any other outcome than LCZ**, unless the area has no landscape values, which is unlikely given its rural nature and the subjective, non-consulted definition of 'landscape values'.

Homeowners in my area **strongly disagree** with IreneInc's narrow assessment. We can demonstrate that the Snug Tiers community meets all three rural living settlement characteristics:

1. A pattern of **at least** 10 smaller blocks, **generally** between 1–15 ha, with a consistent lot pattern. The attached map a shows' my property among 41 others in Snug Tiers, with lot sizes from 0.18ha to 29.89ha, a pattern established since the early 1800s. As you can see all properties can be managed by available RLZ lot sizes to minimise subdivision potential. Our settlement at Snug Tiers adjoins property proposed for RLZ at [redacted]

2. A pattern of 'detached dwellings and outbuildings', which IreneInc admits is "generally met, as many lots have identified residences and cleared areas". As you can see from the attached map b, you can see that dwellings and outbuildings are located on nearly every property in my community. This also includes properties with development applications or strategic plans for living on empty blocks.


You can see the house, sheds and water tanks.

3. Visual evidence of rural activities such as 'clearings, grazing and hobby farming etc'. IreneInc states that "some residential uses are associated with farming", yet at the review hearing, it was clarified that the criteria list is only an example. My property shows


This area is where we grow potatoes and righthand photo is the wood shed and on the left is the enclosed garden with fruit trees and vegetable garden. The trees in the back ground were all canes up until 1967.


On a non-hazy day you can see the Margate train, Redwood Village and on the other photo you can see Bruny Island. Please observe that we have not damaged the skyline as the trees grow our view becomes less and we have not attempted to change that. We fully understand that these trees are juvenile oldest being around 58 years old.

ASSESSING LANDSCAPE VALUES

The STRLUS CV 4.1 states that **community consultation** should determine landscape values. IreneInc admits in review hearings that they didn't consult. This means the assessment of whether properties meet 'landscape values' is now entirely based on the Planning Authority's judgment.

IreneInc's choice of dictionary terms 'hilly places' and 'bushland,' and focus on tree-centric descriptions, i.e.: 'predominantly bushland,' 'allotments set within native bushland,' 'dwellings are … nestled into vegetation,' and 'bushland backdrop' are the main basis for our locality's landscape values.

This overlooks the value of other features like waterways, fields, foraging areas, and the importance of varied terrain (grasslands, clearings, open areas, trails) for different species habitat. Such diversity is vital for a healthy rural or biodiverse landscape and aligns with evidence that people prefer varied scenery, including homesteads, sheds, and domestic animals.

The lack of consultation and reliance on terminology that favours the Planning Authority's narrow definition results in a flawed or biased assessment:

1. Large areas of bushland and vegetation alone do not justify LC zoning. As confirmed at the TPC review hearing on 14/4/26, "LCZ is not for managing vegetation—that is the role of the Natural Assets Code", which applies to

all properties. IreneInc stated that for properties in our area proposed RLZ, overlays will likely (and logically) protect the natural values they identify.

2. Describing dwellings and large lots around topography as 'scattered' implies no strategic planning or intent, which is untrue. You can see on the attached map b that there's overwhelmingly strategic intent for living.

3. Biased reasoning: noting large vegetated spaces on rural properties (and comparatively less dwelling area, as set by development criteria) is worded in the report as though this is a choice or evidence that OUR preference was conservation over living: "integration of residential use … is largely within a small proportion of a parcel", "the remaining natural setting reinforces the area's natural values".

4. Owning private property in natural settings doesn't mean residents prioritise landscape conservation over residential amenity. IreneInc implies this repeatedly, both in review references to "built form" being "secondary to the natural landscape" and, in hearings, that lots in bushland reinforce or "contribute" to the area's "natural values". Snug Tiers residents purchased homes in natural areas because they **value the contribution this makes to their Rural Living**, not to add to Kingborough's undefined scenic or "landscape values".

5. IreneInc relied on overlays in a desktop assessment to identify landscape or environmental features across the locality, ignoring the challenges of topography and identifying these (i.e., through the tree canopy) by aerial images alone. Evidence-based alternative reports or maps of individual properties' natural settings are needed. This property has the same vegetation, flora and fauna as The Lark and Creese report done on the adjoining block [redacted].

6. The scenic protection overlay is broadly applied to properties over 100m above sea level. The photos used in the report, sourced from realestate.com, are aerial shots intended for sale and don't accurately reflect what is seen from local roads, towns, or waterways. Even IreneInc admits that in the locality "bushland, landform, and ridgeline features … remain visually intact," and the reality is that the siting of homes on Snug Tiers means

SPOT ZONING, SPLIT ZONING AND FRAGMENTATION

The TPS aims to prevent spot zoning, yet IreneInc suggests Rural/LCZ split zones on some properties in my locality, which could cause mismatched zone priorities and land use. It's also **more logical** that the rural activity forms part of an **overall Rural Living community pattern**. There is arguably less fragmentation created by leaving one spot zoned Rural property within an RLZ settlement, than proposing multiple restrictive split zonings.

IreneInc have also shown that their application of this method is inconsistent. For example, a large lot of 108.84ha at 2274 Channel Highway is split zoned Rural/RLZ and abuts ELZ, RLZ, and Low Density Residential zones, while smaller ELZ parcels have been denied RLZ at all.

BALANCING LANDSCAPE VALUES AND LAND USE

In their S35F report, Kingborough council states that applying the Rural Living zone to rural residential areas **may** "risk that the predominant land use pattern and characteristics of the area could be eroded over time…". This ignores the long-standing rural nature of the area and the fact that rezoning to LCZ would significantly restrict ongoing private land use, **absolutely guaranteeing** a change in "character and amenity".

The report notes a "medium/high" risk of RLZ uses in this locality but doesn't specify what those risks are, how **likely** they are considering the topography, vegetation, and existing settlement patterns, or whether they could be managed through overlay codes, SAPs, or other mechanisms. IreneInc acknowledged that future reviews could reconsider RLZ decisions, and that any short-term risks could be mitigated. This supports the case that RLZ is appropriate for my property, not LCZ.

At the review hearings, Kate Heckelmann admitted there are **no land uses** that would impact landscape values which aren't already managed by building codes or overlays. This suggests overlaps through stricter zoning isn't necessary because landscape "values can be appropriately **managed through the application and operation of the relevant codes**" (Kingborough LPS guidelines, RLZ 4b).

Assuming LCZ is the only way to protect generic 'landscape values' ignores existing land management, bushfire mitigation efforts, biodiversity initiatives, and conflicts with the intent of the evaluation pathway of **balancing** landscape protection with existing land uses. It is illogical to rezone properties to LCZ to 'protect' the landscape that we've proven we can already care for on our own.

IreneInc suggest that LCZ zoning near Snug Recreation Area is necessary to provide connectivity to the EMZ and act as a buffer between living zones. Not only have National Parks (EMZs) already been put aside for state management, nearly every other Tasmanian council placed other living zones: Rural Living, Residential, Rural, Agricultural, and even Industrial zones next to National Parks or EMZs. It is also contradictory to the placement of Low Density Residential lots beside Coningham's EMZ reserve.

Rural Residential owners provide a significant free workforce to manage areas on the interface of bush, coast, country and town. They need to be able to continue to mitigate natural disaster, care for native species, maintain trails, carriage ways and fire access, and remove invasive pests, which is at risk in the LCZ. Our efforts help protect biodiversity, reduce financial and disaster risks, and improve resilience and food security for all - work that cannot be replaced by council staff or State Parks and Wildlife service.

SUMMARY

Throughout the LPS process, Kingborough Council has failed to consult the community and has not followed the objectives of LUPAA, which emphasise fair land use and community involvement. Their focus on environmental protection seems aimed at removing private land rights, risking long-term harm to residents' well-being and creating potential future financial and legal challenges.

I appreciate the TPC taking heed of the concerns within this letter and respectfully ask for rezoning properties from ELZ to more restrictive zones to stop. Specifically, I request that the TPC direct my property to be zoned from the ELZ to Rural Living Zone D, with environmental priorities managed by existing natural values codes.

Yours sincerely,

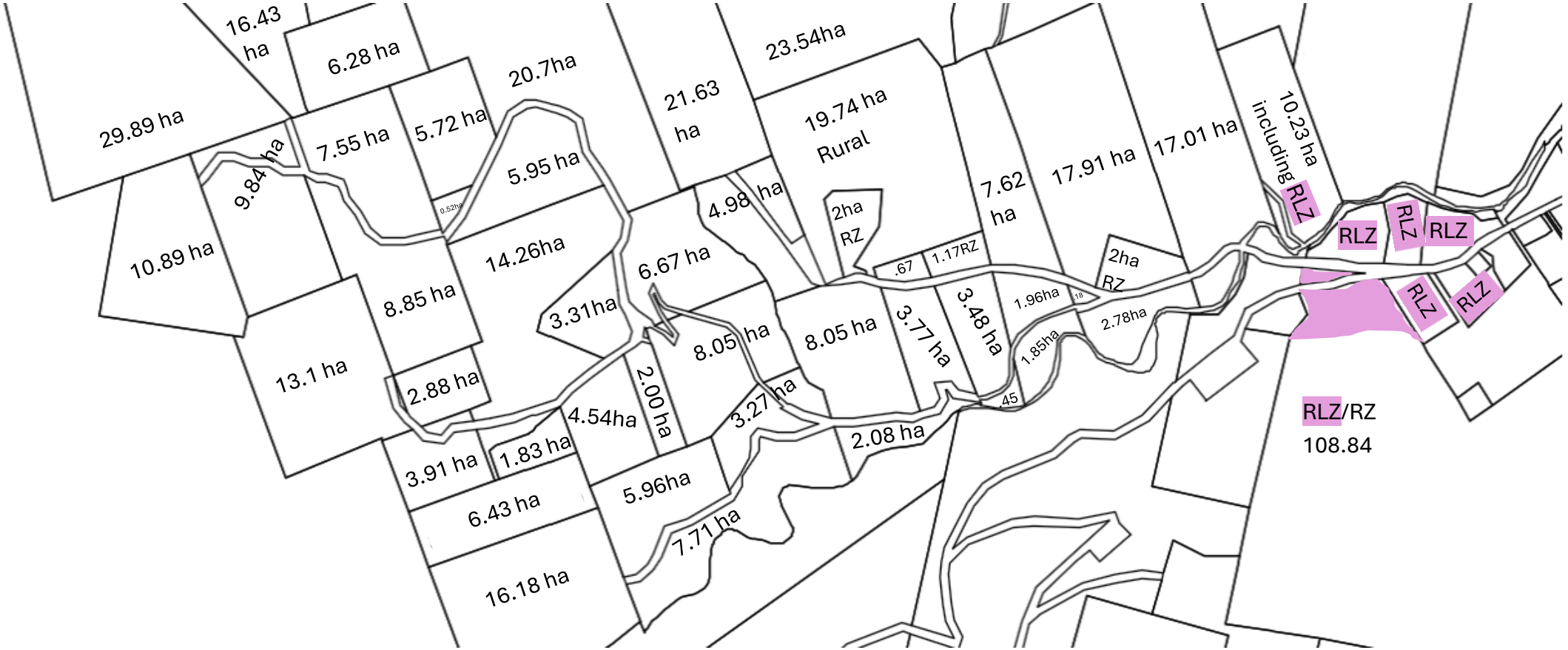
[redacted]

Iain Freeman

[redacted]

Snug Tasmania 7054

Send to: **KingboroughLPS@planning.tas.gov.au**



SNUG TIERS SETTLEMENT - LOT SIZE

SNUG TIERS RURAL LIVING STRATEGIC INTENT

LARK & CREESE PTY LTD
LAND AND ENGINEERING SURVEYORS

[redacted]

NATURAL VALUES ASSESSMENT

[redacted], Snug

For

A. & L. Ottway

August 2021

D. Summers (BAppsc)

LARK & CREESE

62 Channel Highway, Kingston 7050 Ph 6229 6563 info@larkandcreese.com.au

Table of Contents

1. Summary....3
2. Proposal and Site Description....5
3. Native Vegetation....6
4. Introduced Plants....9
5. Conservation Values....11
6. Discussion....19
7. Conclusions....23
8. References....24

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1. Summary

The following natural values assessment is attached to a development application to construct a Class 1A dwelling within [redacted] Snug (C.T[redacted]). Currently the property is zoned Environmental Living under the Kingborough Interim Planning Scheme 2015 (KIPS2015). The report assesses potential impacts of the proposal including during the construction phase and medium to long term residual impacts on ecological functions within and surrounding the proposed site in order to in order to assist local, State and Commonwealth agencies in the approval process.

Legislative Implications
Threatened Flora

- No threatened plant species listed under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* had previously been recorded on site, or were recorded at the time of assessment,
- Native bushland within the allotment is within range boundaries and potentially represents suitable habitat for a few threatened species listed on Tasmania's *Threatened Species Conservation Act 1995,* however none were recorded at the time of survey,
- *Prasophyllum amoenum* (Dainty leek-orchid) is listed as Endangered under the *Environmental Protection & Biodiversity Conservation Act 1999*. Site assessment indicates the proposed development site does not constitute suitable habitat for this species. As such there are no issues relating to endangered flora under these acts[18]. No further assessment required.

Vegetation communities

- Proposed development site is within land classified as Agricultural land (FAG) and does not require the removal of native vegetation to facilitate development and therefore will not trigger provisions within the Biodiversity Code requiring biodiversity offsets,
- The vegetation to the south of the proposed development envelope is consistent with TASVEG4.0 wet *Eucalyptus regnans* (broadleaf facies) forest veg community and not *E. obliqua* with broadleaf shrubs forest (WOB) classification,
- WRE is not listed as threatened under Tasmania's *Nature Conservation Act 2002.* No further assessment or referral required under this Act.

Threatened Fauna

- No fauna species listed under Tasmania's *Threatened Species Conservation Act 1995* and Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* have previously been recorded within the allotment,
- The site within potential range boundaries of a small number of threatened fauna species but not previously recorded within the allotment Site is within potential range habitat for Devils and Quolls,
- Previous Devil sightings were in 1996 to the northeast on [redacted]. Previous recordings within 5000m were from the presence of scats and an identified carcass.
- It is unlikely the proposal will adversely affect critical habitat to the extent the proposal may compromise breeding activity or cause a decline in the species population. As such it is anticipated a referral under the EPBC Act is not required[18],
- Geographically the site located within an area considered important breeding habitat for the critically endangered Swift parrot. Assessment indicates the proposed development site and access does not support core foraging habitat (*Eucalyptus globulus* or *E. ovata*) or mature age forests capable of generating hollows suitable for nesting habitat. As such it is anticipated a referral under the EPBC Act is not required[18],

Weed Management

- One weed species, Slender thistle, listed under Tasmania's *Weed Management Act 1999* was recorded within the allotment, however distribution is limited to one small infestation. Legislative obligations require the implementation of an appropriate Statutory Weed Management Plan to contain this species.

The entire development footprint is within disused pasture and the establishment of a BAL-19 bushfire hazard management area will not require the removal of native vegetation. As such it is anticipated the residential style development is limited to disturbance and will not result in a significant loss of potential foraging and denning habitat for the Tasmanian Devil, Eastern or Spotted tailed Quoll or compromise the existing ecological systems and functions within the surrounding environs within WRE to the south.

General Management Prescriptions

Additional management prescriptions such as hygiene protocols have been recommended to ensure the retention and protection of existing ecological functions within the property during the construction phase. Management prescriptions include:

- Where appropriate implement protection mechanisms for retained eucalypts during the access construction in accordance with protection of trees on development sites (AS 4970-2009),
- Implement Statutory Weed Mgt Plan for the control and containment of Slender thistles,
- Implement a hygiene management plan prior to commencement of works for all development including prescriptions to prevent accidental importation of new weed species and *Phytophthora cinnamomi* during construction, including washing down all machinery and vehicles in accordance with *Tasmanian Washdown Guidelines for Weed and Disease Control: Machinery, Vehicles and Equipment (Edition 1, 2004)*,
- Stage development to avoid blanket clearance when undertaking earthworks within the designated development envelopes and avoid any unnecessary traffic outside the development envelopes and access footprint.
- In conjunction with engineers implement a soil, water and erosion management plan for all development detailing location for permanent / temporary soil, waste material stockpiling and parking,

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2. Proposal and Site Description

This report has been undertaken as part of a development application to the Kingborough Council to construct a Class 1A dwelling within C.T. [redacted]. The survey assessed natural values with a focus on existing values within proposed access and development site that may result in potential impacts on existing ecological functions of the site and interaction with surrounding vegetation communities. Survey methodology based on 'Site Examination for Threatened and Endangered Plant Species'[1] supported by methodology outlined in "Manual for Assessing Vegetation Condition in Tasmania" [2]. This report specifically assesses impacts against the Kingborough Interim Planning Scheme 2015 (KIPS2015) in order to assist local, State and Commonwealth agencies in the approval process. The study site was assessed by Doug Summers in May 2020.

The 9.88ha allotment is currently zoned Environmental Living[3] with similarly zoned allotments to the east and south. Land beyond to the south and west is zoned Environmental Management[3]. A 20m wide Reserve Road passes east to west in the northern section to access allotment to the west. Only 2.3ha out of the 9.88 ha is cleared land, located in the northern section (including the Reserve Road) the south facing allotment supports native forest and a Class 4 Waterways and Coastal Protection Area (see Figure 7).

The underlying geology for the location of the proposed access and development envelope is described as Upper glaciomarine sequences of pebbly mudstone, pebbly sandstone and limestone. A survey found no geomorphic conservation features or geoconservation sites within the property [4]. An Aboriginal heritage desktop assessment review failed to find documented Aboriginal heritage sites within or close to the proposed development site [4]. Research also indicted no documented cases of *Phytophthora cinnamomi* (Pc) were found within the property [4].

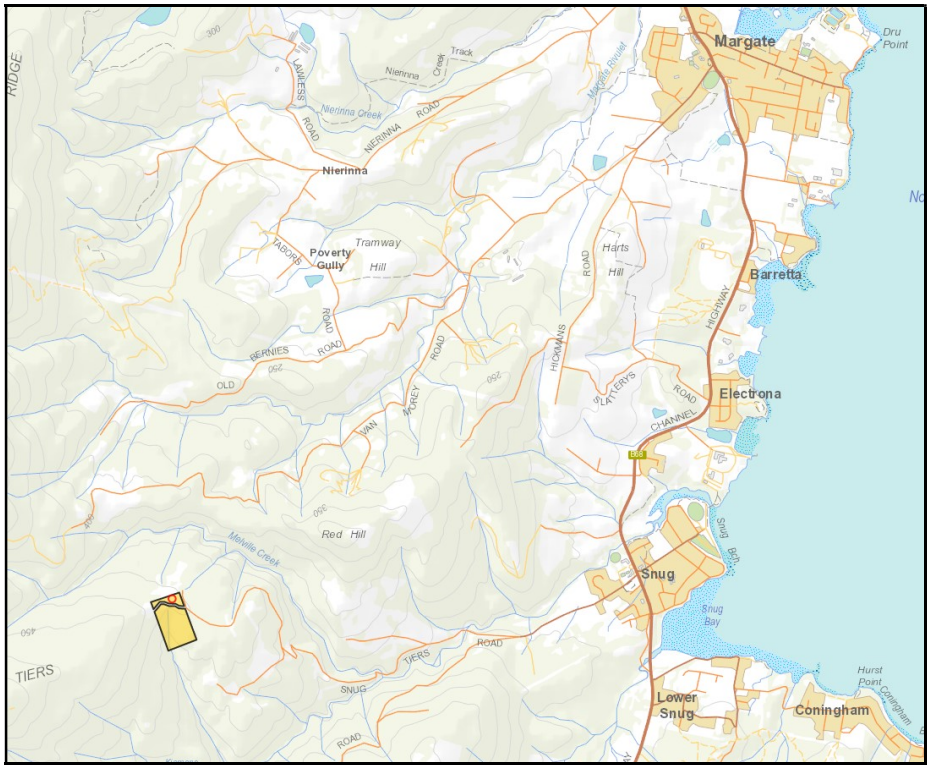

Figure 1 – Locality map, [redacted], Snug (LISTmap, DPIPWE).

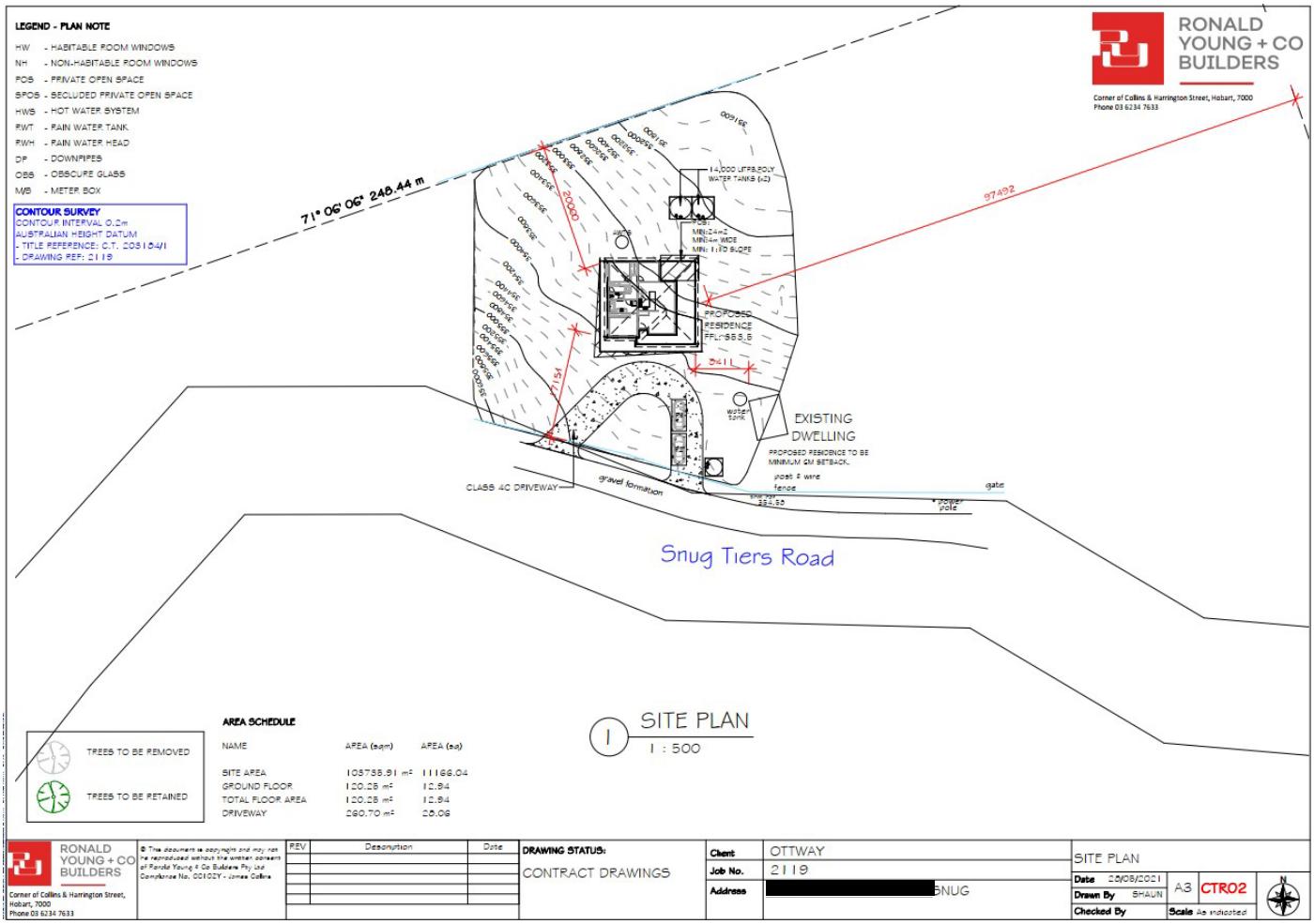

Figure 2 – Site plan – [redacted], Snug.

1 Dawson & Rochow, 1982
2 DPIPWE, 2009
3 KPS2000
4 Natural Values Atlas 3.0

3. Native Vegetation

No vascular plant species listed under Schedule 3, 4 or 5 of the Tasmanian *Threatened Species Protection Act 1995* or the Commonwealth's *Environment Protection & Biodiversity Conservation Act 1999* was recorded or has previously been recorded within 500 metres of the proposed development site. The proposed site is within range boundaries of a number of threatened flora species.

Access
The development proposes to access the site via [redacted] and will not require the removal of native vegetation and is clear of the Class 4 Waterways and Coastal Protection Areas (WCPA) to the south.

Proposed development envelope
Vegetation community surrounding the access and proposed development envelope appears to be consistent with TASVEG 4.0 of Agricultural land (FAG).

Figure 3 - Aerial image showing TASVEG4.0 classification of vegetation communities within and surrounding the allotment (black). The red circle illustrates the approximate location of the proposed development envelope. DOB - dry *Eucalyptus obliqua* forest, FAG - Agricultural land, FAG - Agricultural land, NAD - *Acacia dealbata* forest, WOB - wet *Eucalyptus obliqua* forest with broadleaf shrubs.

Vegetation communities
The current owner indicates the previous land use varied from farming currents and berries, but also included harvesting of the native forest. TASVEG4.0 classify the native vegetation community to the south as WOB however ground truthing indicates the vegetation community is more consistent with wet *Eucalyptus regnans* broadleaf facies forest (WRE) classification from Forest to Fjaeldmark Kitchener, A. and Harris, S. eds (2013).

The understory is dominated by the tall shrub layer however species composition consistent with WOB including *Olearia argophylla, Coprosma bicolor, Pomaderris apetela, Zieria arborescens,*

Nematolepis squamea and Pittosporum bicolor. Ground ferns appeared to be only present where disturbance had occurred such as on the fringe of the tracks and firewood harvesting practices including *Pteridium esculentum*, *Histiopteris incisa* and *Polystichum proliferum*. Grasses were very sparse generally confined to clearings along the edge of tracks and disturbed areas dominated by *Poa sp*.

5 TASVEG 3.0, DPIPWE
6 Harris & Kitchener, 2005

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4. Introduced Plants

At the time of assessment one plant species, Slender thistles, listed as Declared species under the Tasmanian *Weed Management Act 1995* was recorded. Assessment indicated the distribution was limited to one infestation occupying disturbed pasture. Plants ranged from 50 - 150mm high but have not appeared to have flowered. Given the limited distribution of the infestations short term control with eradication the long-term objective.

Figure 4 – Aerial image showing location of proposed development site (circled) and approximate location and distribution of Slender thistles (polygon on south side of Road Reserve).

The clients have been notified of their obligations to control this species and indicated they will undertake control actives in line with the Statutory management plan for this species. Given the proposed development envelope is free of other common weed species and plant pathogens, it is recommended a hygiene management plan is implemented before the construction phase. This should include that all contractors adopt best hygiene practice and wash down machinery and earthmoving equipment **off-site** prior to commencement of works to mitigate the accidental introduction of additional weed species during and post construction phase. If complied with these measures will mitigate potential accidental introduction of additional weed seeds and is widely accepted as best practice.

Table 1 – Weed species present on site. (Excludes exotic grass, century plant and Plantago species).

Weed Species	Status [7]	Distribution / Action
Carduus pycnocephalus Slender thistle	• Declared plant species under Tas Weed Mgt Act 1995 • Priority 'B' Containment & Rank 1 in Kingborough Weed Mgt Strategy 2015-25	• One infestation totalling approx.. 1100m2 (see map) • Core infestation with sparse distribution • Implement guidelines in Statutory weed management plan, • Integrated control strategies • Short to medium term management objective is to control with herbicide the primary management mechanism,

		• Long-term objective is to eradicate, • Physical removal and herbicide application primary control mechanisms

***Phytophthora cinnamomi* (Pc)**

Recent survey of the Natural Values Database indicated no Pc infestation within the property however 1 documented *Phytophthora* case have been recorded to the north along Old Bernies Road, Margate. Forestry Practice Authority list wet *Eucalyptus regnans* forest (WRE) as not being susceptible to *Phytophthora* (Table 2: Flora Technical Note No. 8). Whilst unlikely to become established the project manager should seek a guarantee from earthmoving contractors that machinery, equipment and vehicles have not recently worked within the areas above or other known Pc infested areas. If so contractor must provide guarantees that all vehicles have been cleaned **offsite** to a standard that complies with *Tasmanian Washdown Guidelines for Weed and Disease Control: Machinery, Vehicles and Equipment (Edition 1, 2004)* before commencement of works to prevent accidental introduction of Pc.

Figure 5 - Image showing typical distribution Slender thistles located in disturbed pasture in north west corner of allotment.

Figure 6 – Image looking south at extent of Slender thistle infestation.

6 Southern Tasmanian Weed Management Strategy 2005
7 Flora Technical Note No. 8. Forest Practices Authority, Hobart, Tasmania.
8 Biodiversity Database, Forest Practices Authority

5. Conservation Values

The site is considered to be within range boundaries for Tasmanian Devils, Spotted-tailed and Eastern Quolls, and to a lesser extent the Eastern-Barred Bandicoot. Both Quolls and Devils inhabit a diverse range of habitats with both utilising hollow logs, caves, rock piles and disused rabbit or wombat burrows. Dry grassland and forest within the allotment and adjacent to agricultural land to the north, particularly where pasture grubs are common[15] represents preferred habitat for the Eastern quolls while Spotted-tailed quolls generally prefer wet sclerophyll forests where it preys on small mammals. Whilst their habitat will not be significantly impacted, development and occupation introduce indirect pressure such as ongoing disturbance and domestic pets.

The proposed development is within areas considered that potentially represent Swift Parrot Important Breeding Areas (see Figure 15). Assessment failed to find core foraging habitat in the form of *Eucalyptus globulus* or *E.* ovata. The Forestry Practice Authority Biodiversity Values Database modelling shows the proposed development site is classified as 'Nil" with respect to mature habitat. Ground assessment failed to location any stumps that exceeded 700mm dbh.

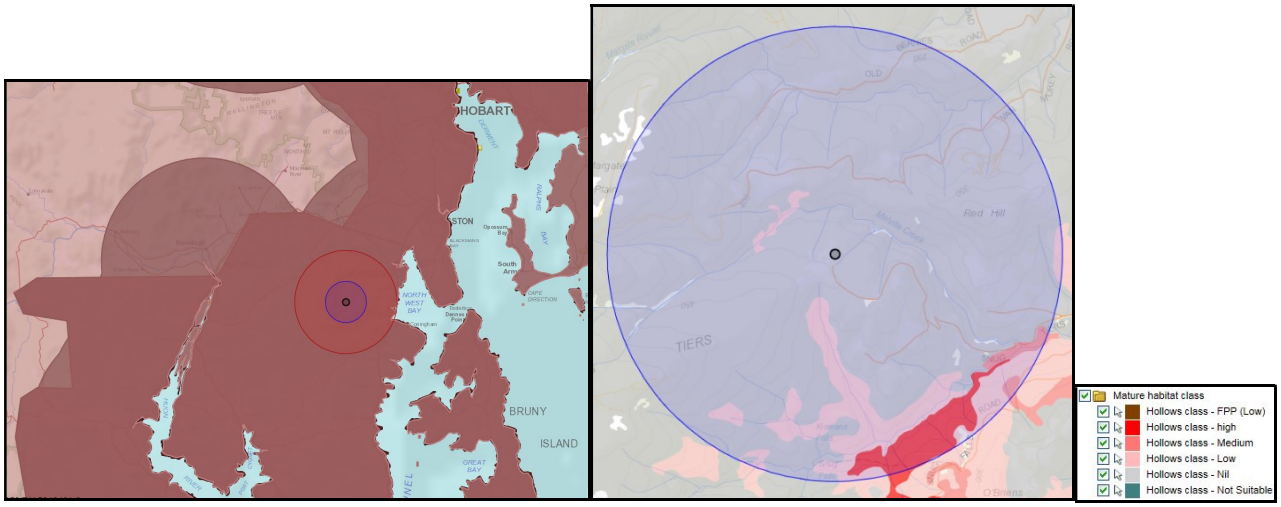

Figure 7 – LH Image showing the extent of Swift parrot Important Breeding Areas (dark red), extents of potential range (medium red shade) and potential extents of foraging habitat (light red shading) in proximity to the proposed development site. RH image showing the distribution of mature forest in proximity to the proposed development site (REF: Forestry Practice Authority Biodiversity Values Database).

In accordance with forestry Practice Authority Fauna Technical Note No. 3: Identifying swift parrot breeding habitat assessment (Table 2 & 3) indicates the vegetation surrounding the proposed development site is;

- Classified as representing 'Negligible' as the vegetation community does not support core foraging trees (*Eucalyptus globulus, E. ovata*),
- Classified as representing 'Low' to 'Medium' potential nesting habitat for wet sclerophyll forest as there are less than 8 trees per hectare of any eucalypt species greater than 70cm diameter at breast height.

The WRE forest communities also represents potential habitat for the endangered Masked owl however this species requires old growth mature forest that have the capacity to generate large nesting hollows. The WRE forest community within the property is young and lacks mature characteristics

such as limb loss from wind damage indicating the proposed forest does not support preferred habitat for this species. The wet sclerophyll vegetation community represents potential habitat for the Mt Mangana stag beetle, Surveys recorded two large logs in early stage of decomposition and two others in advanced stages of decomposition. Site plans indicate the proposal will not encroach into potential habitat for this species.

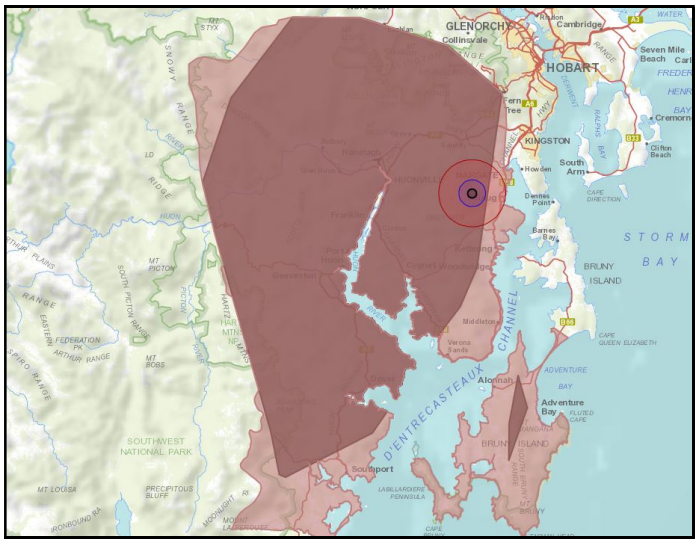

Figure 8 - Image showing the potential range boundaries of Mt Mangana Stag beetle in proximity to the proposed development site (REF: Forestry Practice Authority Biodiversity Values Database).

Geographically the site is within the potential range boundary of the Chaostola skipper (*Antipodia chaostola*) listed as endangered on Tasmania's *Threatened Species Protection Act 1995* and the Commonwealth's *Environmental Protection Biodiversity Conservation Act 1999*. Surveys failed to find suitable habitat in the form of principal foodplants, *Gahnia radula and G. microstachya,* for larvae habitat.

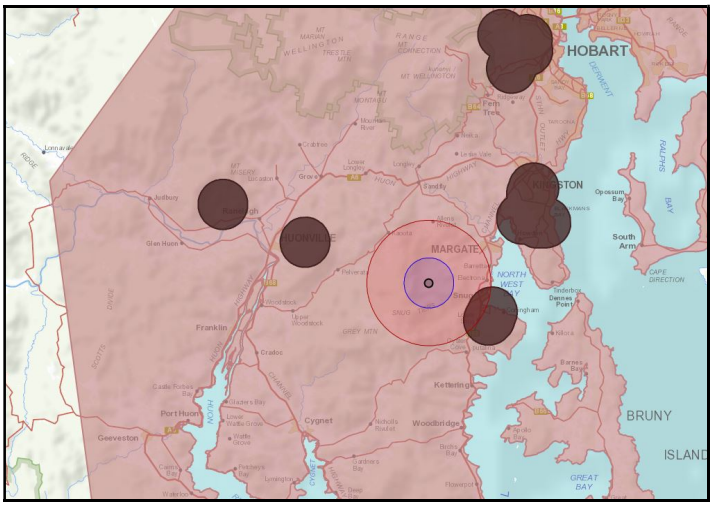

Figure 9 - Image showing documented Chaostola skipper sightings in proximity to the proposed development site (REF: Forestry Practice Authority Biodiversity Values Database).

Habitat nesting modelling for potential nesting sites below 850 metres indicates some section of WRE within the allotment supports a moderate likelihood (3-5) of suitable nesting habitat for the Tasmanian Wedge-tailed eagle and White-bellied sea eagle. Assessments of forest surrounding the proposed development site indicted the forest was less than 27m in height with no individual trees exceeding 27m. It is not anticipated the scale and location of future development will impact existing nesting sites

or future breeding activities for the Tasmanian Wedge-tailed eagle and White-bellied sea eagle as they generally require ≥ 10 ha of relatively undisturbed forest is preferred[13]. Whilst within potential foraging range for the endangered Forty-spotted pardalote, the wet sclerophyll vegetation community does not support its preferred habitat of *Eucalyptus viminalis*[14].

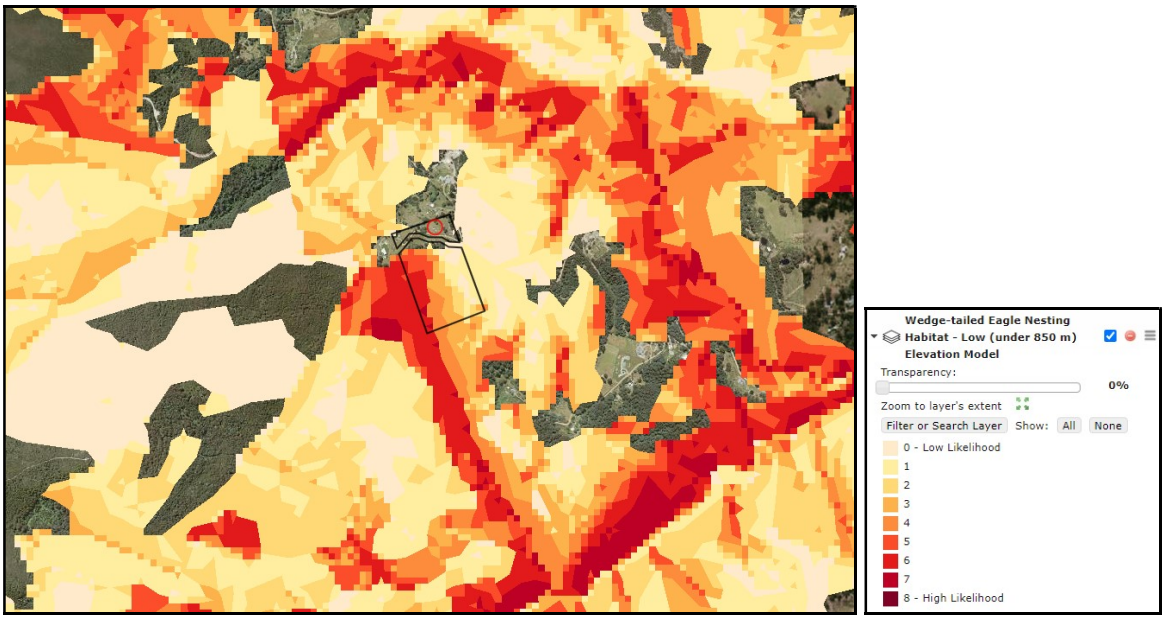

Figure 10 – Image showing the likelihood of suitable nesting habitat within the allotment.

Table 1- Significant plant species previously recorded within 5 km radius of the study area [16]
(Threatened species Unit, NP&WS & *Tasmanian Threatened Species Protection Act 1995, Commonwealth Environmental Protection, Biodiversity Conservation Act 1999 and Tasmanian Nature Conservation Act 1999*)

CONSERVATION STATUS			
No Threatened Flora within 500 metres			
Threatened Flora within 5000 metres			
SPECEIES	**TSPA**	**EPBC**	**COMMENTS**
Allocasuarina duncanii Duncan's sheoak (Endemic to Tas)	rare	-	Not recorded. The proposed access and development site do not represent suitable habitat for this species. No further assessment required. No permit required.
Austrostipa bigeniculata Double jointed speargrass	rare	-	Not recorded. Mature inflorescences required for identification. This perennial grass generally flowers between Nov-Jan. Species is found mainly in the southeast and midlands in open woodland and grasslands. Proposed development envelope and WRE to the south do not constitute potential habitat. No further assessment required. No permit required.
Caladenia filamentosa Daddy longlegs	rare	-	Not recorded. This ground orchid dies back to subterranean tubers. Identifiable in months of Sept-Nov. Generally occurs in lowland heathy and sedgy open eucalypt forest and woodland on sandy soils. Proposed access and development envelope does not constitute potential habitat. No further assessment required. No permit required.

Corunastylis nuda Tiny midge-orchid	rare	-	Not recorded. Flowers required for identification. Optimum survey time is Jan-Feb-Mar. Occurs in wide range of habitats including scrub, subalpine grassland, heathy open forest, open rock plates among forest, shrubby dry sclerophyll forest and open wet sclerophyll forest on a range of different soil types. Proposed access and development envelope constitute marginal habitat. No further assessment required. No permit required.
Deyeuxia minor Small bentgrass	rare	-	Not recorded. Mature inflorescences are required for identification. Flowering is form Nov-Dec. Occupies open eucalypt forests or the margins of wet Sclerophyll forest in the south of the State. Proposed access and development envelope constitute marginal habitat with margins or WRE potential habitat. No further assessment required. No permit required.
Dryopoa dives Tas giant mountain grass	rare	-	Not recorded. Reproductive material required for identification, flowering between Nov-March. This species recorded to the west on Snug Plains in wet or damp sclerophyll forest, tea tree scrub, tussockland and sedgeland. Typically occurs in the ecotone between heathy moorlands and damp sclerophyll. Proposed development envelope clear of potential habitat. No further assessment required. No permit required.
Epacris virgata Pretty heath (Endemic to Tas)	vulnerable	-	Not recorded. Occurs amongst foothills around the D'Entrecasteaux Channel and Tas Peninsula. Prefers dry sclerophyll forest on hilly terrain at elevations between 10-300 m, mainly on Jurassic dolerite. Generally, associates with *Eucalyptus ovata and E. pulchella* woodland / forest. Proposed development envelope does not constitute potential habitat. No further assessment required. No permit required.
Isolepis habra Wispy clubsedge	rare	-	Not recorded. Generally requires mature fruit to identify this species that is usually present Dec-March, however fruit can be present at other times of the year. Habitat is poorly understood and variable as it occurs form lowland to highland sites in forests and non-forest habitats. Wet sclerophyll and riparian habitats may be preferred. Proposed development envelope does not constitute potential habitat. No further assessment required. No permit required.
Lepidosperma tortuosum Twisting rapiersedge	rare	-	Not recorded. Usually occurs in open heathland and eucalypt woodland in the south-east Tas. Proposed development envelope does not constitutes potential habitat. No further assessment required. No permit required.
Prasophyllum amoenum Daintly leak-orchid	vulnerable	Endnagered	Not recorded. This orchid is endemic to Tas occurring in the Snug Tiers and the Wellington Range. Total population is fewer than 1000 plants. Generally occupy sedgey moorland, subalpine sedgeland and bolster heath. Flowers are required for the identification flowering between (Jan-mid Feb). Proposed development envelope does not represent potential habitat. No further assessment required. No permit required.
Pterostylis atriola Snug greenhood	rare	-	Not recorded. This orchid is endemic to Tas occurring in the north and south of the State. Flowers are required for the identification flowering between (Jan-Mar) with peak in Feb. Generally prefers disturbed sites on stony soil in dry to damp sclerophyll forest, typically with an open understorey occurring at a range of elevations but strongly associated with cold winter sites or areas receiving a moderately consistent rainfall. Proposed development envelope does not represent potential habitat. No further assessment required. No permit required.

Pterostylis squamata Ruddy greenhood	vulnerable	-	Not recorded. Prefers open eucalypt forest on well drained sandy and clay loams. Proposed access and development envelope does not constitute potential habitat. No further assessment required. Proposed development envelope does not represent potential habitat. No further assessment required. No permit required.
Westringia angustifolia Narrow-leaf westringia (Endemic to Tas)	rare	-	Not recorded. Occurs predominantly in dry, shrubby understorey, often on dolerite 300-900 metres above sea level Proposed development envelope does not represent potential habitat. No further assessment required. No permit required.

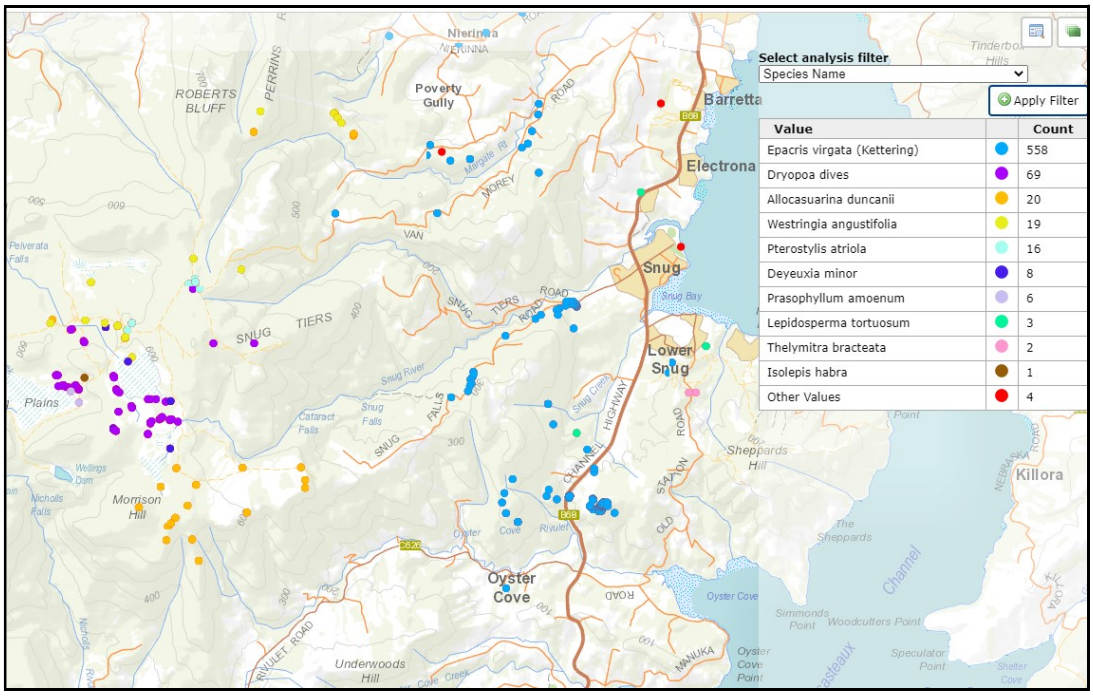

Figure 11 - Image showing the distribution of threatened flora species within 5 kms of the proposed development site (black circle).

Table 2- Significant fauna species previously recorded within 5 km radius of the study area and likelihood of them occurring on site[17] Threatened species Unit, NP&WS. TSPA - *Tasmanian Threatened Species Protection Act 1995,* EPBC -*Commonwealth Environmental Protection, Biodiversity Conservation Act 1999*

CONSERVATION STATUS			
No Threatened Fauna within 500 metres			
Threatened Fauna within 5000 metres			
SPECEIES	**TSPA**	**EPBC**	**COMMENTS**
Accipiter novaehollandiae Grey Goshawk	endangered	-	No previously recorded within or near proposed development site. Vegetation communities do not constitute potential foraging or nesting habitat. Prefer tea-tree waterways lined with *Leptospermum sp.* The proposal will not impact priority habitat. No further assessment required.
Aquila audax fleayi Tasmanian	endangered	Endangered	Not previously observed on site. 6 nests within 5 km, none within line-of-sight. Assessment indicates the forest canopy is less than 27m in height. Habitat modelling indicates a section

Wedge-tailed eagle			of WRE veg represents a 'Medium' likelihood of nesting. Anticipate the proposal will not impact priority habitat, nesting or breeding activities. No further assessment required. No permit required.
Dasyurus maculatus & subsp *maculatus* Spotted-tailed Quoll	rare	Vulnerable	Not previously recorded. Proposed development site within range boundaries. This Quoll species prefers wet sclerophyll. WRE represents potential habitat. Proposed development envelope will not directly impact important foraging or denning habitat. No further assessment required. No permit required.
Dasyurus viverinus Eastern Quoll	-	Endangered	Not previously recorded. Proposed development site within range boundaries. Open pasture juxtaposed to bushland represents potential habitat. Anticipated proposed development envelope will not significantly impact important foraging or denning habitat. No further assessment required. No permit required.
Haliaeetus leucogaster White-bellies sea eagle	vulnerable	-	Not previously recorded. Habitat modelling indicates the proposed development site represents a low likelihood of nesting with WRE potentially representing 'Medium'. Proposed development envelope will not encroach into areas that represent suitable nesting habitat. Anticipate the proposal will not impact, nesting or breeding activities. No further assessment required. No permit required.
Hirundapus caudacutus White-throated needletail	-	Vulnerable	Not recorded. Migratory bird breeding in the Northern hemisphere and flying south for the winter, generally arriving in Tas in Nov. Proposed location does not constitute suitable habitat. No further assessment required.
Lathamus discolor Swift parrot	endangered	Critically Endangered	Not previously recorded. Site within Swift parrot Important Breeding Areas. No core foraging habitat (*Eucalyptus globulus* or *E. ovata*). Mature *E. regnans and E. obliqua* represent potential nesting habitat. Therefore I do not anticipate the proposal will cause a decline in core habitat or impact population or survival of species. No further assessment required. no further assessment is required.
Lissotes menalcas Mt Mangana stag beetle	vulnerable	-	Not recorded. Distribution of this species is patchy within areas of suitable habitat. Inhabits advanced decaying logs on the forest floor. 4 logs representing suitable habitat clear of proposed development site. No further assessment required. no further assessment is required.
Pardalotus quadragintus Forty-spotted pardalote	endangered	Endangered	Not previously recorded. Core foraging habitat, *Eucalyptus viminalis* is absent from the site and as such I do not anticipate the proposal will impact this species. No further assessment required. no further assessment is required.
Perameles gunnii Eastern-barred Bandicoot	-	Vulnerable	Not previously recorded on site. Occupies a variety of habitats from forest, woodland and urban environments. Requires long dense grass and low shrub cover for foraging and refuse juxtaposed to open grassland. Anticipate access route and proposed development envelope will not significantly impact important foraging or refuge habitat. No further assessment required. No permit required.

Sarcophilus harrisii Tasmanian Devil	endangered	Endangered	Not recorded on site but previously recorded to the north. Proposed development site constitutes potential habitat. Anticipate access route and proposed development envelope will not significantly impact important foraging or denning habitat. No further assessment required. No permit required. No further assessment required.
Tyto novaehollandiae	endangered	Vulnerable	Not previously recorded. This species requires mature old growth forest that supports large nesting hollows. Anticipate the proposal will not impact priority habitat, nesting or breeding activities. No further assessment required. No permit required.

Table 3 – Habitat for threatened fauna based on Range Boundaries.

Threatened fauna within **5000** metres

(based on Range Boundaries)

Species	Common Name	SS	NS	BO	Potential	Known	Core
Lathamus discolor	swift parrot	e	CR	mbe	1	0	1
Dasyurus maculatus subsp. maculatus	spotted-tail quoll	r	VU	n	1	0	0
Litoria raniformis	green and gold frog	v	VU	n	1	0	0
Prototroctes maraena	australian grayling	v	VU	ae	1	0	0
Antipodia chaostola	chaostola skipper	e	EN	ae	1	0	1
Pseudemoia pagenstecheri	tussock skink	v		n	1	0	0
Tyto novaehollandiae subsp. castanops	masked owl (Tasmanian)	e	VU	e	1	0	1
Haliaeetus leucogaster	white-bellied sea-eagle	v		n	3	0	0
Accipiter novaehollandiae	grey goshawk	e		n	1	0	1
Pardalotus quadragintus	forty-spotted pardalote	e	EN	e	1	0	0
Sarcophilus harrisii	tasmanian devil	e	EN	e	1	0	0
Lissotes menalcas	mount mangana stag beetle	v		e	1	1	0
Perameles gunnii	eastern barred bandicoot		VU	n	1	0	1
Aquila audax subsp. fleayi	tasmanian wedge-tailed eagle	e	EN	e	1	0	0
Brachionichthys hirsutus	spotted handfish	e	CR	e	1	0	0
Dasyurus viverrinus	eastern quoll		EN	n	0	0	1

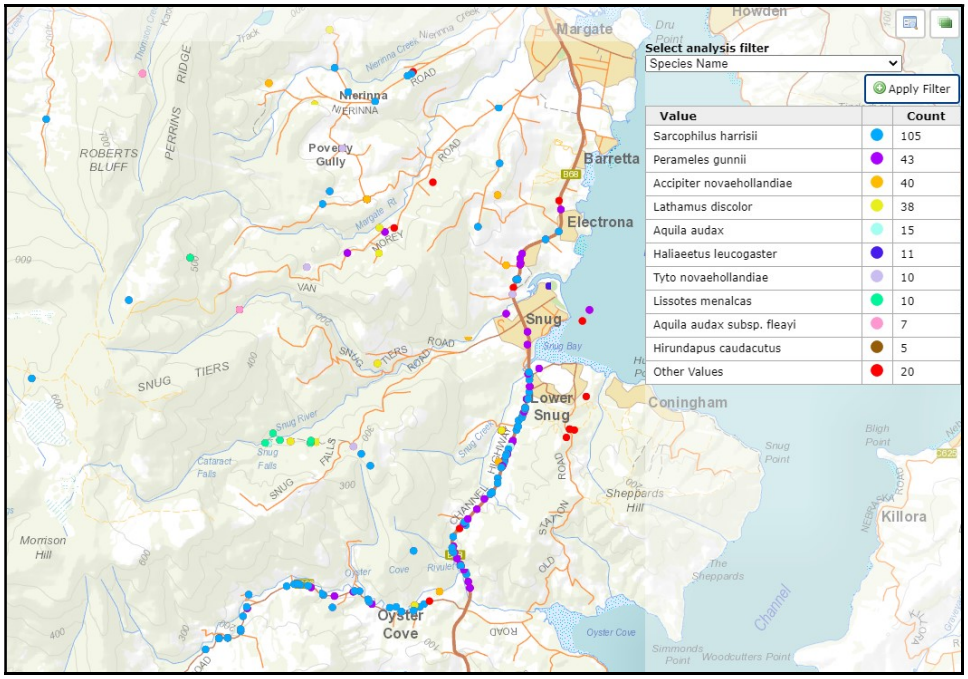

Figure 12 - Image showing the distribution of threatened fauna within 5 kms of the proposed development site (black circle).

[redacted]

6 Biodiversity Database, Forest Practices Authority
7 Fauna Technical Note No. 1. Forest Practices Authority, Hobart, Tasmania.
8 Fauna Technical Note No. 3. Forest Practices Authority, Hobart, Tasmania.
9 Fauna Technical Note No. 5 Forest Practices Authority, Hobart, Tasmania.
10 Fauna Technical Note No. 6 Forest Practices Authority, Hobart, Tasmania.
11 Fauna Technical Note No. 17. Forest Practices Authority, Hobart, Tasmania.
12 Fauna Technical Note No. 3. Forest Practices Authority, Hobart, Tasmania.
13 Biodiversity Database, Forest Practices Authority
14 Threatened Species Unit, PIPWE
15 Flora Technical Note No. 10. Forest Practices Authority, Hobart, Tasmania.
16 Threatened Species Unit , DPIPWE
18 Commonwealths' Environmental Protection and Biodiversity Conservation Act 1999
19 Tasmanian Threatened Species Protection Act 1995
20 Tasmanian Nature Conservation Act 1999 & Land Use Planning and Approvals Act 1993
21 Southern Tasmanian Weed Management Strategy 2011-2016

6. Discussion

Assessment indicates the native vegetation community within the allotment is consistent with TASVEG 4.0 classification of wet *Eucalyptus regnans* vegetation community (WRE) and not wet *E. obliqua* with broadleaf shrubs vegetation community (WOB). WRE vegetation community is not listed as threatened veg community under Tasmanian's *Nature Conservation Act 2002*. Assessment indicates the proposed development envelope is entirely within pasture and the BAL-29 construction standards will not require the removal of any native veg to facilitate development, including access and bushfire hazard management area. The *Acacia dealbata* in the north-east corner of the bushfire hazard management area was removed due to significant dieback.

Figure 13 - Image showing proposed location of development site, access, and extent of BAL-19 bushfire hazard management area clear of surrounding vegetation.

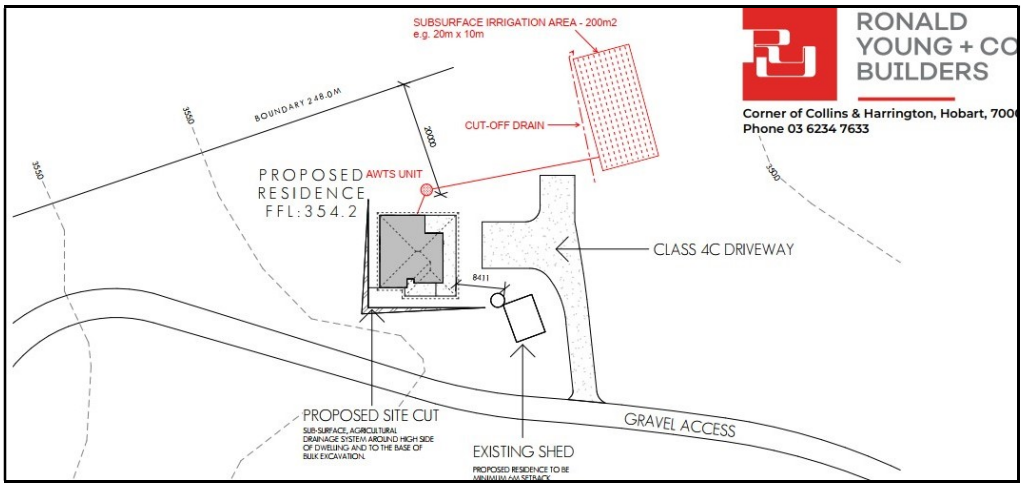

Figure 14 – Site plan showing location of the wastewater system and infrastructure clear of vegetation. Note: The final access configuration will be as illustrated in Figure 13.

Legislative Implications
Commonwealths' *Environmental Protection & Biodiversity Conservation Act 1999* (EPBCA).

Potentially there are 2 issues of national significance relating to the Act, the nationally endangered and vulnerable fauna [18]

- *Dasyurus maculate* (Spotted-tailed Quoll) – Rare TSPA & Vulnerable EPBCA,
- *viverinus* (Eastern Quoll) - Endangered EPBCA,
- *Sarcophilus harrisii* (Tasmanian Devil) - endangered TSPA & Endangered EPBCA

Prasophyllum amoenum (Dainty leek-orchid) is listed as Endangered under the *Environmental Protection & Biodiversity Conservation Act 1999*. Site assessment indicates the proposed development site does not constitute suitable habitat for this species. As such there are no issues relating to endangered flora under this act[18].

Under the EPBC Act referral is required if:
'An action has, will have, or is likely to have a significant impact on a vulnerable/endangered species if it does, will or is likely to (amongst other things):

- *Modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline,*
- *Adversely affect habitat critical to the survival of a species'*

Previous Devil sightings in 1996 were to the north-east on [redacted]. The location is within potential range habitat for Devils and Quolls. As no clearance and conversion of bushland is required it is anticipated the proposal will not result in significant impacts and unlikely to adversely affect critical habitat to the extent the proposal may displace individuals and/or compromise breeding activity or cause a decline in the species population. As such it is anticipated a referral under the EPBC Act with regards to these species is not required[18].

Tasmanian *Threatened Species Protection Act 1995* (TSPA)
No threatened flora species listed as threatened on the Tasmanian *Threatened Species Protection Act 1995* were recorded during the survey, therefore no permit under this Act is required. Grassland adjacent to bushland represents potential foraging and refuse for the Spotted-tailed quoll, but as stated above I do not anticipate the proposal will result in the loss of significant potential habitat and as such a referral to the Policy Conservation Assessment Branch will not be requried[19].

Tasmanian *Nature Conservation Act 2002* and *Land Use Planning and Approvals Act 1993*
The proposed development site is clear of vegetation communities listed as threatened under the *Nature Conservation Act 2002*. Therefore, anticipated the proposal will not require a forestry practices plan under this legislation [20] but approval from Council.

Tasmanian *Weed Management Act 1999* (WMA)
Slender thistles found within the proposed access is listed as a Declared weed under the Tasmanian *Weed Management Act 1999* and subject to Statutory Management Plans under the WMA. In accordance with Kingborough Weed Management Strategy and Action Plan 2017-2027 Slender thistle classified as Zone B and a Priority Ranking of 4 [21]. Property owners have undertaken management actions in accordance with legislative requirements to control and contain this plant.

Kingborough Interim Planning Scheme 2015

E10.0 Biodiversity Code

The proposed development site is within Kingborough Council's Biodiversity Protection Area. However, site plans indicated the proposal does not require the removal of native vegetation. Therefore, it is anticipated the proposal will not trigger clauses within the Biodiversity Code requiring native vegetation to be suitably offset.

E23.0 On-site Wastewater Management Code

As indicated all associated infrastructure, including the waste-water management system and absorption trenches will be entirely contained within development envelope and clear of the Class 4 Waterways and Coastal Protection Areas to the south. Providing the wastewater systems are designed to geotechnical specifications by approved manufactures and installed by certified operators it is anticipated the systems will not result in any long-term residual impacts on native vegetation down-slope from the facility.

Legislative Implications

Threatened Flora

- No threatened plant species listed under the Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* had previously been recorded on site, or were recorded at the time of assessment,
- Native bushland within the allotment is within range boundaries and potentially represents suitable habitat for a few threatened species listed on Tasmania's *Threatened Species Conservation Act 1995,* however none were recorded at the time of survey,
- *Prasophyllum amoenum* (Dainty leek-orchid) is listed as Endangered under the *Environmental Protection & Biodiversity Conservation Act 1999*. Site assessment indicates the proposed development site does not constitute suitable habitat for this species. As such there are no issues relating to endangered flora under these acts[18]. No further assessment required.

Vegetation communities

- Proposed development site is within land classified as Agricultural land (FAG) and does not require the removal of native vegetation to facilitate development and therefore will not trigger provisions within the Biodiversity Code requiring biodiversity offsets,
- The vegetation to the south of the proposed development envelope is consistent with TASVEG4.0 wet *Eucalyptus regnans* (broadleaf facies) forest veg community and not *E. obliqua* with broadleaf shrubs forest (WOB) classification,
- WRE is not listed as threatened under Tasmania's *Nature Conservation Act 2002.* No further assessment or referral required under this Act.

Threatened Fauna

- No fauna species listed under Tasmania's *Threatened Species Conservation Act 1995* and Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* have previously been recorded within the allotment,
- The site within potential range boundaries of a small number of threatened fauna species but not previously recorded within the allotment Site is within potential range habitat for Devils and Quolls,
- Previous Devil sightings were in 1996 to the north-east on [redacted]. Previous recordings within 5000m were from the presence of scats and an identified carcass.

- It is unlikely the proposal will adversely affect critical habitat to the extent the proposal may compromise breeding activity or cause a decline in the species population. As such it is anticipated a referral under the EPBC Act is not required[18],
- Geographically the site located within an area considered important breeding habitat for the critically endangered Swift parrot. Assessment indicates the proposed development site and access does not support core foraging habitat (*Eucalyptus globulus* or *E. ovata*) or mature age forests capable of generating hollows suitable for nesting habitat. As such it is anticipated a referral under the EPBC Act is not required[18],

Weed Management

- One weed species, Slender thistle, listed under Tasmania's *Weed Management Act 1999* was recorded within the allotment, however distribution is limited to one infestation. Legislative obligations require the implementation of an appropriate Statutory Weed Management Plan to contain this species.

7. Conclusions

The development proposal is within disused pasture and the establishment of a BAL-19 bushfire hazard management area will not require the removal of native vegetation. The wastewater system and absorption trenches are also entirely within disused pasture and will not require the removal of vegetation and not have any residual impact on vegetation to the east. As such, it is anticipated the residential style development will not result in the loss of potential foraging and denning habitat for Tasmanian Devil, Eastern or Spotted tailed Quoll or compromise the existing ecological systems and functions within the surrounding environs. No referral or further assessment under Tasmanian *Threatened Species Protection Act 1995* or Commonwealth's *Environment Protection and Biodiversity Conservation Act 1999* required.

In accordance with Tasmanian *Weed Management Act 1999* Slender thistle present will require management following guidelines within the statutory weed management plan issued by DPIPWE. Management actions should also include best practice hygiene protocols prior to commencement of works to mitigate the accidental introduction of additional weed species during the construction phase.

General Management Prescriptions
Additional management prescriptions such as hygiene protocols have been recommended to ensure the retention and protection of existing ecological functions within the property during the construction phase. Management prescriptions include:

- Where appropriate implement protection mechanisms for retained eucalypts during the access construction in accordance with protection of trees on development sites (AS 4970-2009),
- Implement Statutory Weed Mgt Plan for the control and containment of Slender thistles,
- Implement a hygiene management plan prior to commencement of works for all development including prescriptions to prevent accidental importation of new weed species and Phytophthora cinnamomi during construction, including washing down all machinery and vehicles in accordance with Tasmanian Washdown Guidelines for Weed and Disease Control: Machinery, Vehicles and Equipment (Edition 1, 2004),
- Stage development to avoid blanket clearance when undertaking earthworks within the designated development envelopes and avoid any unnecessary traffic outside the development envelopes and access footprint.
- In conjunction with engineers' guidelines implement a soil, water and erosion management plan for all development detailing location for permanent / temporary soil, waste material stockpiling and parking.

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[redacted]

VASCULAR PLANT SPECIES LIST
[redacted], SNUG

DICOTYLEDONAE

FAMILY NAME / *Species name*	Common name
ASTERACEAE	
Cassina aculeata	Dolly bush
Bedfordia salicina	Blanket leaf
Senecio salicina / linearis	Groundsel
Olearia argophylla / viscosa	
ERICACEAE	
Monotoca glauca	
FABACEAE	
Pultenaea juniperina	
GOODENEACEAE	
Goodenia ovata	Hop-Native primrose
MIMOSACEA	
Acacia dealbata	Silver wattle
Acacia melanoxylon	Black wood
Acacia leprosa	
MYRTACEAE	
Eucalyptus regnans	
Eucalyptus obliqua	
Leptospermum scoparium	Common Teatree
PROTEACEAE	
Lomatia tinctoria	Guitar plant
RHAMNACEAE	
Pomaderris apetala	
ROSACEAE	
Acaena novae-zelandiae	
RUBIACEAE	
Coprosma bicolor	
Coprosma quadrifida	

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RUTACEAE
Nematolepis squamea
Zeria arborescens

SANTALACEAE
Exocarpos cupressiformis — Native cherry

MONOCOTYLEDONAE

FAMILY NAME
Species name — Common name

CYPERACEAE
Lepidosperma spp — Sword sedge

POACEAE
Austrodanthonia spp — Wallaby grass
Poa sp

XANTHORRHOEACEAE
Lomandra longifolia — Sagg

PTERIDOPHYTA

FAMILY NAME
Species name — Common name

DEMMSTAEDTIACEAE
Pteridium esculentum — Bracken
Polystichum proliferum

INTRODUCED PLANT SPECIES

Carduus pycnocephalus — Slender thistles