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Omega Investment Holdings Pty Ltd
ATTENTION: Roger Noble
143 Wickham Terrace
Fortitude Valley QLD 4006

13 December 2020

Dear Roger

RE: The Mills project
Statement on Natural Values Management

Preamble

In early 2020, Environmental Consulting Options Tasmania (ECO*tas*) was engaged to undertake a natural values assessment of the proposed Mills project in New Norfolk. This was reported in:

> ECO*tas* (2020). *Ecological Assessment of The Mills Project Area, New Norfolk, Tasmania*. Report by Environmental Consulting Options Tasmania (ECO*tas*) for Omega Investment Holdings Pty Ltd, 13 April 2020.

At the time, we assessed the whole site because we had not been presented with any particular land use proposal. Consequently, the report did not address specific provisions of the *Derwent Valley Interim Planning Scheme 2015*.

Subsequent to this, I attended a meeting with various project personnel (17 Nov. 2020) at which time the most likely land use strategy for the site was presented. Following discussion, I requested some analysis be undertaken on the extent of retention of different vegetation types based on our updated vegetation mapping.

Commentary on proposed land use strategy

Overview

In terms of natural values, this site presents an opportunity to provide connections between the higher elevations and the lower elevations closer to the River Derwent, principally through the drainage features. The long use of the site for various activities has resulted in a somewhat degraded condition across much of the site (large areas mapped as non-native mapping units) and the site is dissected by tracks and other disturbance features. However, there are also some relatively less disturbed parts, particularly associated with the drainage systems (but also elsewhere on some rises).

In the absence of specific natural values features requiring formal legislative management (i.e. there are no areas of threatened vegetation communities, no confirmed sites supporting threatened flora, and no particular habitat features strongly associated with threatened fauna), any land use strategy will rely on finding a reasonable balance between development objectives and management of natural (and other) values.

I have reviewed the draft master plan. In my opinion, I can confirm that the concept plans achieve this objective. In particular, I am pleased with the proposed extensive linking of different areas, including (but not wholly restricted to) the drainage system topography.

Specific commentary on vegetation management

The draft concept plan has been analysed against the mapped extent of different vegetation types. Table 1 analyses the retention levels against the mapped extent of each vegetation type.

Table 1. Proportional retention of each native vegetation mapping unit (excludes modified land mapping units of FWU, FUM,FRG, FAG and FPE)

Vegetation community	Mapped extent (ha)	Proposed retention level (ha)	Proportional retention (%)
DAM	33.11	17.60	53%
DVG	1.52	1.52	100%
NAV	9.75	7.00	72%
NBA	31.55	8.06	26%
GCL	8.31	4.46	54%
GTL	0.19	0.00	0%
TOTALS	**84.43**	**38.64**	**46%**

This analysis demonstrates conclusively that the strategy will result in approximately half of the native vegetation being retained. This far exceeds the usual notional/arbitrary proportional set-asides such as 5% public open space applied to many such proposals. Importantly, the higher levels of retention are applied to the eucalypt-dominated vegetation communities (DAM at 53% and DVG at 100%) compared to the complex mosaic of non-eucalypt vegetation types that are far more disturbed and modified. The loss of GTL is not considered of great consequence as this patch is impractical to manage based on its size and location – it is more important to manage the mosaic of GCL-NBA-NAV combined with the higher levels of retention of DAM-DVG.

Ongoing management requirements

The vegetation types present will largely "take care of themselves" i.e. they are resilient and robust to change and edge effects. The understorey types present (i.e. mainly grassy) are highly suitable for periodic slashing and/or burning, which may combine well with a broader bushfire hazard management strategy.

Of greater longer-term concern is that the site is relatively weedy supporting a suite of declared (Tasmanian *Weed Management Act 1999*) and non-declared species. In the short-term, no action is needed – in the absence of significant disturbance, the distribution, diversity and density of weeds is unlikely to worsen. In the longer-term, however, a development of this nature presents an ideal opportunity to significant reduce the distribution, diversity and density

of weeds in retained areas. This could form a logical part of a broader management plan that considers how the retained areas will be used (e.g. undisturbed native vegetation vs. patches with public facilities) as these may create practical priorities.

If weed management is undertaken, it may be that supplementary planting will further enhance the ecological condition of retained native vegetation. In general, such planting is rarely required as the Tasmanian bush recovers quickly by itself. However, a project of this nature does present an opportunity to enhance habitat for threatened fauna species. The best example is the swift parrot that relies on *Eucalyptus globulus* (blue gum) and *Eucalyptus ovata* (black gum) for foraging – the concept plan could include strategic planting of such species – and hollow-bearing trees for nesting – the site has few of these and a nest box roll-out may be possible.

Comparison to other proposals

I note that the approved subdivision plan included significantly less retention of native vegetation (Table 2). In this respect, the revised proposal will have a far "softer" impact on natural values.

Table 2. Proportional retention of each native vegetation mapping unit (excludes modified land mapping units of FWU, FUM,FRG, FAG and FPE)

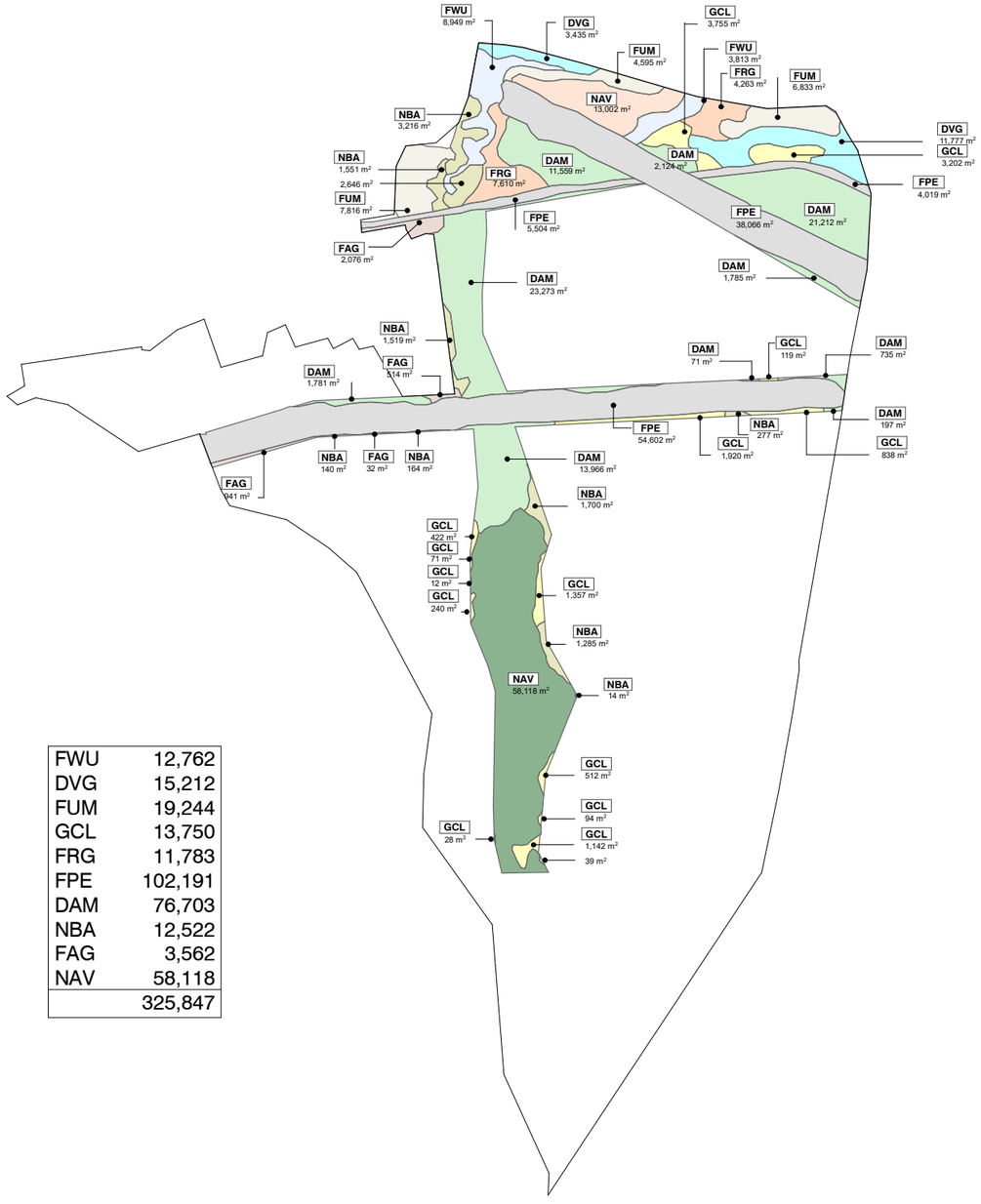
Vegetation community	Mapped extent (ha)	Proposed retention level (ha)	Proportional retention (%) cf. new proposal (%)
DAM	33.11	7.67	23% (53%)
DVG	1.52	1.52	100% (100%)
NAV	9.75	5.81	60% (72%)
NBA	31.55	1.25	4% (26%)
GCL	8.31	1.38	16% (54%)
GTL	0.19	0.00	0% (0%)
TOTALS	**84.43**	**17.63**	**21% (46%)**

Note that this statement does not constitute legal advice, and may not represent the views of the planning authority or other agencies. It is recommended that formal advice be sought from the relevant agency prior to acting on any aspect of both ECO*tas* (2020) and this statement.

Please do not hesitate to contact me further if additional information is required.

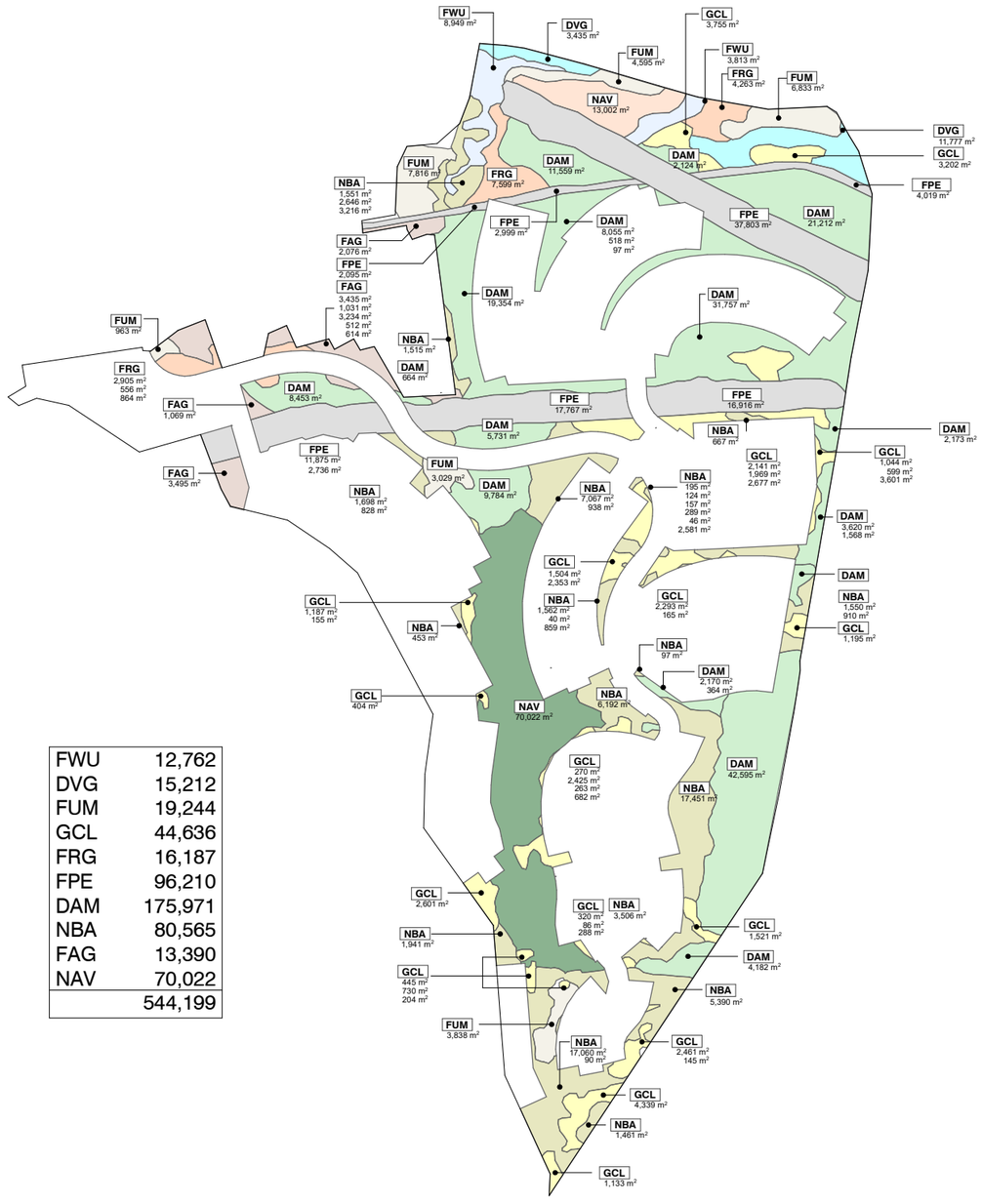
Kind regards

Mark Wapstra
Senior Scientist/Manager



FWU	12,762
DVG	15,212
FUM	19,244
GCL	13,750
FRG	11,783
FPE	102,191
DAM	76,703
NBA	12,522
FAG	3,562
NAV	58,118
	325,847

APPROVED PLAN: RETAINED VEGETATION



FWU	12,762
DVG	15,212
FUM	19,244
GCL	44,636
FRG	16,187
FPE	96,210
DAM	175,971
NBA	80,565
FAG	13,390
NAV	70,022
	544,199

PROPOSED PLAN: RETAINED VEGETATION

PROJECT NAME
The Mills New Norfolk

DRAWING
VEGETATION MAPPING

DATE: 4/12/2020
SCALE: 1:5000
PROJECT NO: 2001
DRAWING NO. SK 24
ISSUE E

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New Norfolk
THE MILLS
VEGETATION MAPPING