

**From:** "Amy Robertson" <amyware@yahoo.com>  
**Sent:** Tue, 31 May 2022 16:53:26 +1000  
**To:** "All HVC Councillors" <hvc@huonvalley.tas.gov.au>  
**Subject:** draft LPS representation - professional land managers  
**Attachments:** Representation\_PVAoverlay\_Experts.pdf

Please find attached.

31 May 2022  
General Manager  
Huon Valley Council  
PO Box 210  
Huonville TAS 7109

Dear Sir,

**RE: Representation for the Huon Valley's draft Local Provisions Schedule of the Tasmanian Planning Scheme: Priority Vegetation Area overlay.**

We, the undersigned land management professionals, wish to register our objection to the broad-scale extent of Priority Vegetation Area overlay under the Natural Assets Code (C7.0) of the draft Huon Valley Local Provisions Schedule.

We detail this position below and propose potential solutions that could improve the quality of this planning tool.

**Background**

Points from the State Planning Provisions (SPPs) relevant to the purpose of this Code include:

C7.1.4 To minimise impacts on identified priority vegetation.

C7.1.5 To manage impacts on threatened fauna species by minimising clearance of significant habitat.

The SPPs clearly define that “priority vegetation means native vegetation where any of the following apply:

- (a) it forms an integral part of a threatened native vegetation community as prescribed under Schedule 3A of the Nature Conservation Act 2002;
- (b) is a threatened flora species;
- (c) it forms a significant habitat for a threatened fauna species; or
- (d) it has been identified as native vegetation of local importance.”

It is worth noting that the greatest source of the most contemporary information on locations of the threatened species or communities referenced in points (a)-(c) are the state government's Natural Values Atlas (NVA) and Tasveg mapping tools, both publicly accessible through TheLIST.

Point (d) above references a process of identification at a local scale, providing for more tailored solutions outside conventional threatened species definitions. An example could be a hypothetical Geeveston community plan to protect streamside vegetation of the Kermadie River and its tributaries to a greater extent than provided by standard Codes, in order to ensure the health of the town's iconic platypus population. It does not refer to conceptual or modelled habitat values at a strategic level.

The SPPs definition is reflected in *Guideline No. 1 - Local Provisions Schedule (LPS): zone and code application*, which states that “The priority vegetation overlay is intended for native vegetation that:

- forms an integral part of a threatened native vegetation community as prescribed under Schedule 3A of the Nature Conservation Act 2002;
- is a threatened flora species;
- forms a significant habitat for a threatened fauna species; or
- has been identified as native vegetation of local importance.”

All three sources above consistently agree that the Code’s purpose relates to **threatened** flora/fauna/communities, and to **identified** native vegetation of **local importance** (key words highlighted in bold).

### **Addressing intent**

The Huon Valley is fortunate to be covered by the state’s threatened species system which both identifies and prioritises, known and potential locations for threatened species and vegetation communities. With rankings from Critically Endangered through to Rare, this system allows managers and regulators to focus effort where it is most needed.

It is clear from the SPPs and LPS guideline referenced above that the Planning Scheme system is intended to relate to existing systems of prioritisation, with additional locally important areas being added where they are identified – identifying being a decision-based scoping and verification process.

The proposed Priority Vegetation Area Overlay is derived from a Regional Ecosystem Model (REM)<sup>1,2</sup> which goes far beyond the prioritisation and identification of those threatened and locally important values. It is impossible to understand from the condensed PVA Overlay mapping or Priority Vegetation Reports exactly how outputs have been derived from the Regional Ecosystem Model, but we note two key points:

- many other issues on the periphery of conservation prioritisation are included, such as low-occurrence, poorly-reserved and remnant sizing: in some cases these might be “locally important” but are usually drawing in very broad-scale issues beyond the intent of the SPPs.
- input data of varying accuracy is combined with so many concepts that the output model loses both accuracy and information to become part of a hexagonally gridded risk rating, far from the SPP goal of “identified” values and often covering beyond – or less than – the “native vegetation” intended.

A model is useful at a broad level but can never be intended to apply to on-ground management as is intended through the LPS. Instead of being ‘Priority’ the output hexagons

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<sup>1</sup> Knight, R.I. & Cullen, P.J. (2010). Specifications for a Regional Ecosystem Model of natural resources in the Tasmanian Midlands. A report of the Caring for Our Country Project ‘Using landscape ecology to prioritise property management actions in Tasmania’. Natural Resource Planning, Hobart, Tasmania.

<sup>2</sup> Summary of the Regional Ecosystem Model of Tasmanian biodiversity, February 2016

attempt to predict a range of potentially worthwhile conservation issues but become so approximated or conceptual that they cover impossible locations and omit known Threatened Native Vegetation Community sites.

An example demonstrating issues with the proposed PVA Overlay is illustrated in Attachment 1.

### **Undermining the System**

Proposing Priority Vegetation Areas in such a broad-scale and inaccurate way will detract from achieving SPP purposes by creating unnecessary bureaucracy that undermines prioritisation and effective management.

System objectives set out in Part 1 Schedule 1 of the Land Use Planning and Approvals Act 1993 include “1(c) to encourage public involvement in resource management and planning”. To enable this public involvement the system must be simple and understandable – not just for the qualified town planners and consultants using it, but for the Councillors, land owners and broader community whose interests it protects and serves.

The REM’s aggregated risk-rating and approximated hexagonally-gridded output as both Priority Vegetation Area Overlay and proprietary Priority Vegetation Reports does little to assist users’ understanding of actual or potential issues. It actually loses accuracy from some of the more reliable data (eg. NVA threatened species nest records) used as inputs to the REM.

Examples in Appendix B illustrate the lack of helpful guidance coming from Priority Vegetation Reports.

As practitioners in ecology and land management, we are concerned at the potential unnecessary burden for users of this system required to source a consultant’s report to disprove PVA overlay that is inaccurate, unreliable and overly cautious on low priority issues.

This poses both a disincentive to potentially suitable development sites, and risks avoidance by unauthorised activities where landowners ‘drop out’ of the system due to its difficulty. It also potentially diverts Planning Scheme business into other systems not designed to deal with these issues – the Forest Practices system for clearing prior to development or a costly compliance route for those avoiding approvals altogether.

### **What’s the solution?**

In the Huon Valley, relevant information for flora, fauna and vegetation is maintained for currency and broad accessibility through two tools:

- Natural Values Atlas (NVA) – locates reported occurrences of threatened species and potential habitat ranges
- TASVEG - maps vegetation communities, current version is 4.0 (REM based on v3.0) and live updated information is available on LISTmap.

Code Application Guidelines in *Guideline No. 1 - Local Provisions Schedule (LPS): zone and code application* include relevant points:

- **NAC 7** The priority vegetation area overlay must include threatened native vegetation communities as identified in TASVEG Version 3 mapping, as published on the Department of Primary Industries, Parks, Water and the Environment's (DPIPWE) website and available on the LIST.
- **NAC 8** For the purposes of applying the priority vegetation area overlay to land containing threatened flora species, any areas mapped within the overlay should be derived from or based on the threatened flora data from the Natural Values Atlas as published DPIPWE's website and available on the LIST.
- **NAC 9** In applying the priority vegetation area overlay for threatened flora species, the overlay map may include an area around recorded occurrences of threatened flora species to identify areas of potential occurrence based on field verification, analysis or mapping undertaken by, or on behalf of, the planning authority.
- **NAC 10** For the purposes of applying the priority vegetation area overlay to land containing significant habitat for threatened fauna species, any areas identified as significant habitat should be based on the threatened fauna data from the Natural Values Atlas, as published on DPIPWE's website.
- **NAC 11** The priority vegetation area overlay may be based on field verification, analysis or mapping undertaken by, or on behalf of, the planning authority to: address any anomalies or inaccuracies in the mapping and data in clauses NAC 7, NAC 8 and NAC 10 above; or provide more recent or detailed local assessment of the mapping and data in clauses NAC 7, NAC 8 and NAC 10 above.
- **NAC 12** The priority vegetation area overlay may include areas of native vegetation which have been identified as being of local importance based on field verification, analysis or mapping undertaken by, or on behalf of, the planning authority. Identification of these areas may be assisted by datasets or spatial products identified by DPIPWE.
- **NAC 13** A priority vegetation area should not be shown on the overlay map for land that is within... [various zones] eg. Inner Residential Zone,... Port and Marine Zone.

We propose several steps reflecting the above Guidelines on sources and data quality, to improve the Priority Vegetation Overlay:

1. Remove cleared or modified vegetation codes from the Overlay area unless specifically intended for a known threatened species occurrence site (ie. registered on the Natural Values Atlas). TASVEG 4.0 should be used to trim the overlay to exclude F-codes (agricultural, urban etc), other than where identified significant habitat for fauna exists (eg. eagle nest in paddock tree).  
This will benefit many landowners without detracting from conservation outcomes.
2. Renew the vegetation community extents of the overlay based on threatened vegetation community coverage from TASVEG 4.0, the latest and most accurate version of the state's vegetation mapping system with the real priorities of threatened-status vegetation types, and not under-reserved or remnant modelling.
3. Recreate known and likely threatened fauna and fauna habitat extents based on relevant occupancy records from current Natural Values Atlas records, using management constraints from the contemporary Forest Practices Authority and Threatened Species Section advice available through the FPA's Threatened Species Adviser (eg. 100m radius from Grey goshawk nests, 1km radius from Eagle nests).

The above work is largely a straightforward GIS-based task that is likely to resolve many landowner issues with inaccurate or broadscale Overlay extent, using the latest and most accurate data available to anyone as intended by the TPS.

As experienced vegetation management specialists working in the Huon Valley LGA, we are keen to advocate for a reasonable and successful management tool. We would be willing to brief Councillors in a workshop meeting, or present to the Tasmanian Planning Commission, to enable further understanding of these proposals.

To conclude, we present a map of the Huon Valley LGA with Priority Vegetation Overlay, and an approximate boundary line for the western World Heritage Area Reserve. It seems implausible that the priority for vegetation conservation needs is weighted so heavily toward the eastern non-WHA land shaded heavily with green Priority Vegetation Area Overlay, rather than the extensive and important WHA land in the western majority of the LGA.



Priority Vegetation Areas: distribution across Huon Valley LGA, with approximate WHA boundary in orange.

Yours sincerely,

Amy Robertson

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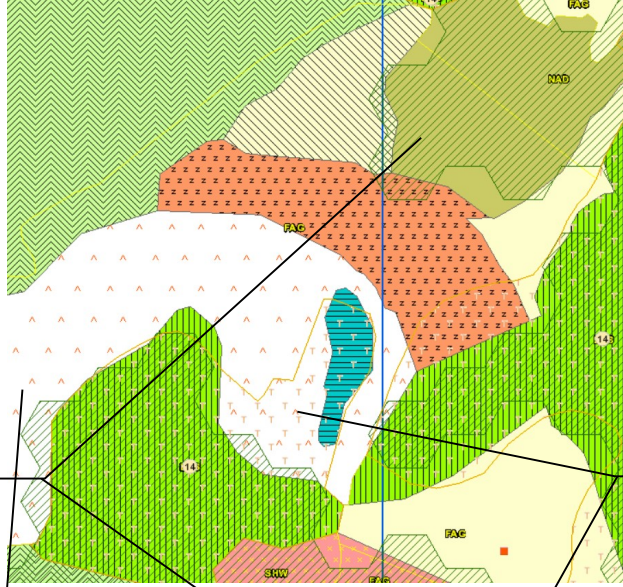
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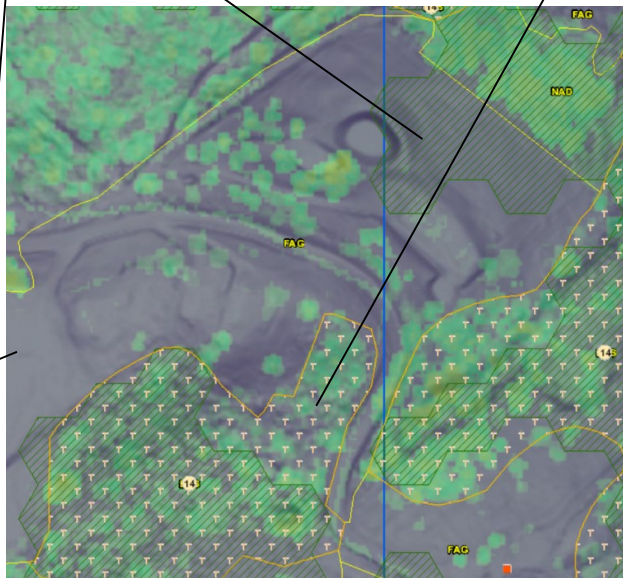
**Appendix A**  
**Example of issues with Priority Vegetation Area Overlay**  
 Location: SE of Surges Bay Recreation Area



Mapped as NAD (Acacia dealbata forest, not a threatened vegetation community) in TASVEG 3.0 but FAG (Agricultural land) in TASVEG 4.0. Not a priority and inaccurate.

Mapped as FUR (urban areas) in TASVEG 3.0, then DAS (Eucalyptus amygdalina forest & woodland on sandstone – a threatened native vegetation community) on TASVEG 4.0. A mapped priority but outside Priority Vegetation Area Overlay.

Surges Bay Oval



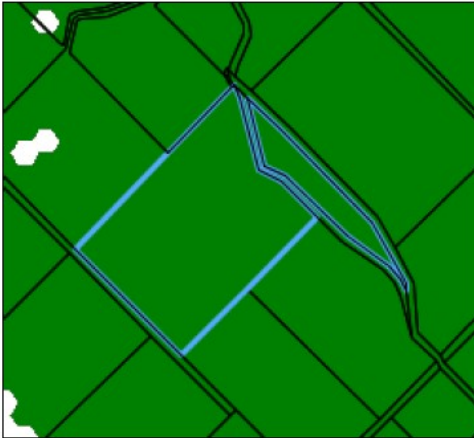
T = Threatened Native Vegetation Community based on TASVEG 4.0 (LISTmap)

/// = Priority Vegetation Area Overlay



## Appendix B

### Examples of issues with Priority Vegetation Reports



#### Threatened Fauna

- grey goshawk
- mount mangana stag beetle
- swift parrot

101 Sorell St Port Huon comprises a mix of pasture and native vegetation and is crossed by a high voltage powerline easement.

Three threatened species are listed but there is no differentiation of habitat between these (eg. wet vs dry forest) because the REM has aggregated risk factors. In this case, a Grey goshawk nest site is recorded within the title (not shown) and a Priority Vegetation Area extending 100m radius around the nest reserve would be entirely appropriate.



#### Threatened Fauna

- mount mangana stag beetle
- swift parrot

The Kermadie River crown land foreshore at Port Huon is identified as being habitat for the Mount Mangana stag beetle and Swift parrot. The green mapped tidal flats are highly unlikely to support either species.



#### Threatened Fauna

- grey goshawk

4564 Huon Hwy Port Huon, a long-cleared (pasture) 670m<sup>2</sup> block proposed for Low Density Residential Zone. This 'priority vegetation' appears to relate to NVA's record (•) of a 1993 sighting of a Grey goshawk 87m away from the property boundary (the sighting was accurate to  $\pm 100$ m).

For comparison, the Threatened Species Adviser tool issuing advice for forest practices operations advises a minimum 100m radius reserve around nest sites (only, not sightings).