

From: "Amy Robertson" <amyware@yahoo.com>
Sent: Tue, 31 May 2022 13:40:05 +1000
To: "All HVC Councillors" <hvc@huonvalley.tas.gov.au>
Subject: Representation - draft LPS
Attachments: Representation_Robertson101Sorell.pdf

Please find attached our representation.

Kind regards,

Amy Robertson

President, Gymnastics Tasmania

Independent forester

[BEnvSci, DipNRM, GAICD, MFA, FPO \(Planning\)](#)

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"Neighbours are always enriching each other culturally. Yet, that does not make them one entity, and does not separate people into "us" and "them". We are different, but that is not a reason to be enemies."

[Volodymyr Zelenskyy](#)

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

Dear Sir,

RE: Representation for the Huon Valley Council's advertised zoning of 101 Sorell St PORT HUON (PID 3422559).

We, Dion and Amy Robertson, owners of the above property would like to submit the following representation that objects to full coverage of the property by Priority Vegetation Area (PVA) Overlay, and recommends particular areas for removal from this overlay.

An Overview of Our Property

Our property is currently zoned as 26.0 Rural Resource under the interim Huon Valley Planning Scheme 2015 as per the data on LISTMap. It has a dwelling and several sheds/storage as indicated on Huon Valley Council's interactive map, and consists of 4 titles covering a total of 19.7 hectares. Under the current Interim Scheme the property has several overlays present being:

- Biodiversity Protection Area – whole property
- Bushfire Prone Area – whole property
- Electricity Transmission Infrastructure Protection – Transend 110kV transmission line corridor
- Waterway and Coastal Protection Areas – covers several Class 4 and 3 streams
- Landslide Hazard Area

The property undulates between about 50m and 150m ASL and is approximately half covered with rough or improved pasture, and half covered with native forest. Sorell St runs through the property from South to North.

The majority of this property has been in family ownership for three generations and some stock being run belongs to a fourth generation. We use the land as a family farm for primarily domestic production but some incidental on-selling occurs, as well as a home business workplace. Stock including cattle, sheep and chickens use almost all the land area, with a number of minor fenced exclusions to manage waterways, steep ground, timber production and/or domestic purposes.

The advertised proposed Scheme zoning is Rural, with overlays of:

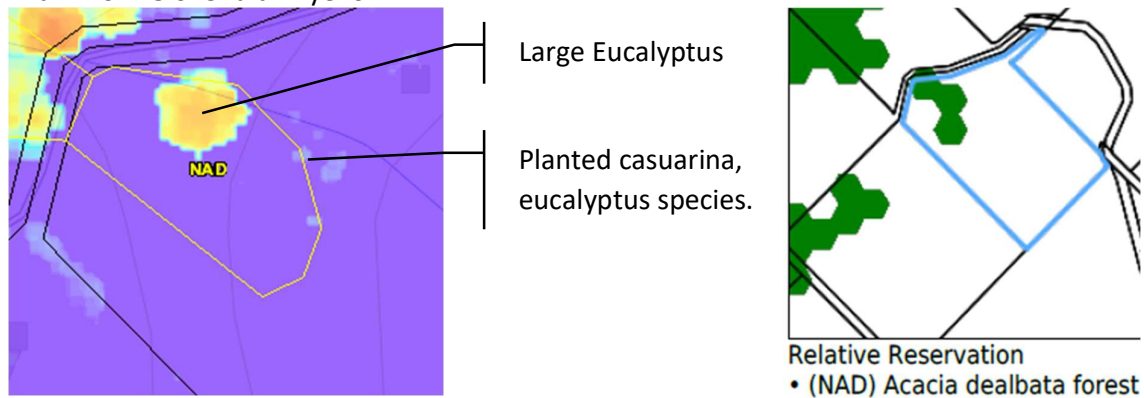
- Bushfire Prone Areas – whole property
- Priority Vegetation Area – whole property
- Electricity Transmission Corridor – Transend 110kV transmission line corridor
- Inner Protection Area – Transend 110kV transmission line corridor
- Waterway and Coastal Protection – covers several Class 4 and 3 streams
- Landslip Hazard
- Scenic Protection Area – uppermost corner >150m ASL

Responding to proposed Priority Vegetation Area overlay under Natural Assets Code

We would like to take issue with several aspects of the Priority Vegetation Area Overlay proposed for this property and communicated in Priority Vegetation Reports, as detailed below.

NAD *Acacia dealbata* forest

The NAD *Acacia dealbata* forest community does not exist as mapped. That patch of mostly wattle was cleared by a former owner in approx. 2007 after being logged over around 1980, and was more likely at the time to have been a eucalypt-sparse DOB community. Current vegetation in the area consists of two large native eucalyptus trees and a planted area we established around 2011 containing casuarina, spotted gum, flowering gum and some native species. LiDAR-sourced Canopy Cover from theLIST illustrates this as per the image below, with TASVEG overlaid in yellow.

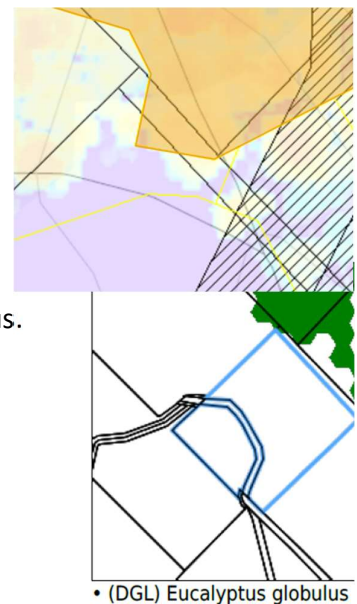


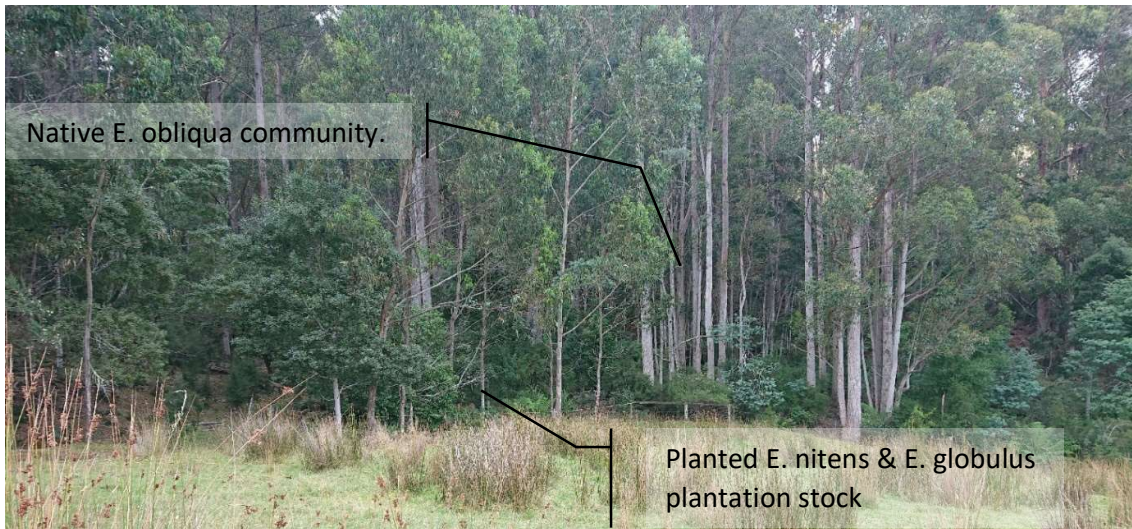
We believe this should be exempt from PVA Overlay as an area of former pasture currently stocked by either paddock trees or a community not naturally occurring on the site, established for farm/garden purposes.

DGL *Eucalyptus globulus* dry forest and woodland

The image following shows a view into this TASVEG mapped community, showing only *E. obliqua* visible beyond our fenceline, which is located on the SW side of the road reserve. Several young smooth-barked eucalypts are visible in the foreground and are plantation-bred *E. nitens* and *E. globulus*, planted as seedlings around 2005 and fenced off from pasture to stabilise around the largely underground stream. This is most certainly not a dry forest community, nor native *E. globulus*.

We believe this should not be PVA Overlay as an area of former pasture deliberately stocked with plantation species.

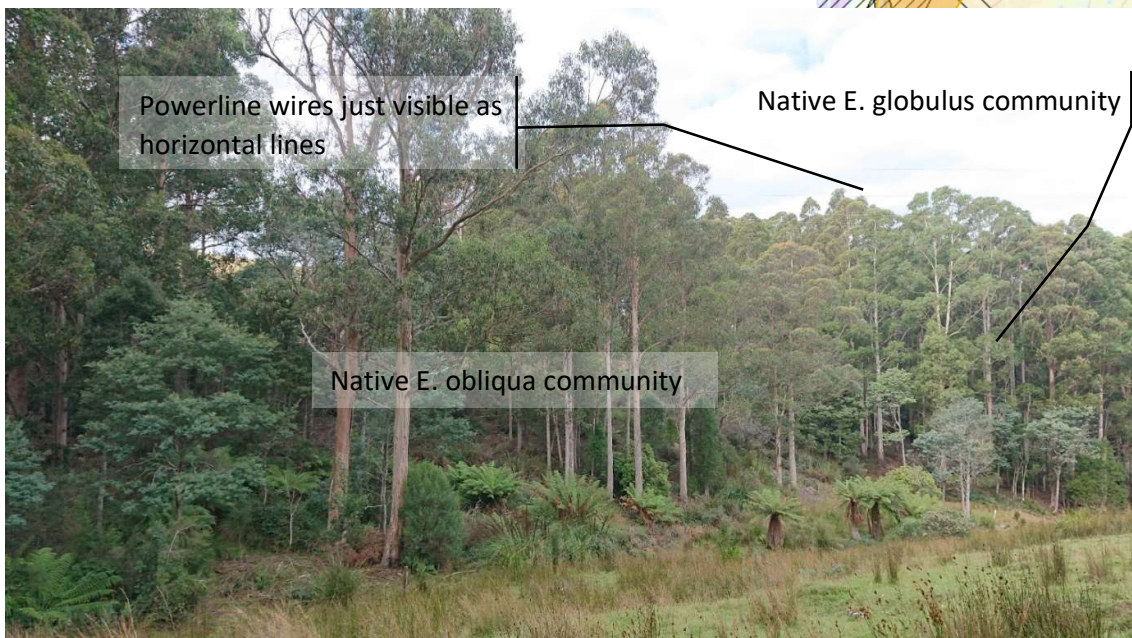
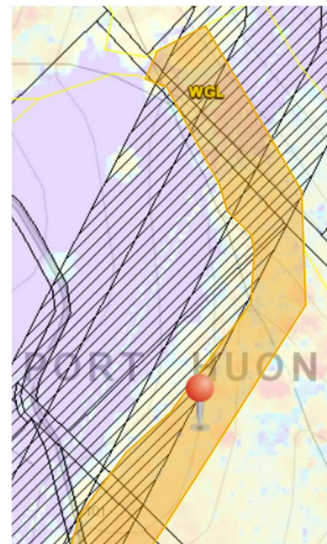




WGL Eucalyptus globulus wet forest

The image below shows a view into the gully along the narrow mapped road reserve, underneath the powerline easement (view eastward across the easement; cleared alignment obscured by central middle ground trees). Most trees to the left and centre of the image are *E. obliqua*, with one live *E. globulus* present.

We believe the northern end of TASVEG-mapped WGL should not be PVA Overlay as it is actually an area of commonly occurring wet *E. obliqua* forest.



Pasture

PVA Overlay is currently proposed across the whole of our four titles, despite approximately half of this being farmed pasture and some of this pasture even lying under the cleared easement of a high voltage transmission line.

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.”

The above 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.”

This pasture is not an integral part of a threatened native vegetation community (a), does not contain threatened flora species (b), and as explained in previous points refuting the TASVEG and PVA Overlay mapped extent of NAD, DVG, DGL and WGL communities on the property, seems not to meet the SPP definition of “native vegetation... means plants that are indigenous to Tasmania including trees, shrubs, herbs and grasses that have not been planted for domestic or commercial purposes”.

An additional area of pasture occurs mapped as DOB (E. obliqua dry forest) under several scattered E. obliqua paddock trees at the far western end of the property, as per the following photo. We believe this too is better categorised outside the PVA Overlay.



Scattered E. obliqua trees over pasture at far western end of property; solid bush is beyond our fenceline.

The remaining possible definition of priority vegetation is as “significant habitat for a threatened fauna species”, and three fauna species are listed in the Priority Vegetation Reports for the four titles of the property. It is unfortunate that we are unable to source better information on the Regional Ecosystem Model’s assumptions for fauna species presence and protection, but information from other sources is included in the following section on PVA within forested areas. In summary, all three species are forest dwellers and unlikely to be impacted by activities in the pasture area.

This is also consistent with SPP C7.4.1 “The following use or development is exempt from this code: ...(c) clearance of native vegetation within a priority vegetation area, (i) on existing pasture or crop production land...”

Forest stands and threatened fauna

Two areas of native forest remain on the property:

- Approx 0.6 ha on and north of the westernmost class 4 stream above the powerline easement.
- Approx 10 ha on the lower eastern slopes of the property, comprising a mix of *E. obliqua*, *E. globulus*, *E. viminalis* with drier forest on the upper east-facing slopes and wet forest lower and around the streams.

Four species of threatened fauna are reported in the Priority Vegetation Reports for the four titles of the property:

Grey goshawk: two nest sites are recorded on NVA within the property, but both lie further than 100m inside the forested area, where 100m is the minimum forested nest reserve buffer recommended by the Forest Practices Authority and Threatened Species Section through the Threatened Species Adviser (see measurement on adjacent map).

Swift parrot: no records exist in the vicinity from NVA. While being within Core Range and the Southern SPIBA, potential habitat for this critically endangered species includes *E. globulus* trees for foraging and older hollow-bearing trees for nesting. Some WGL is mapped on the site, but most trees are regrowth following passage of the 1967 bushfire through the property.

Mount Mangana Stag Beetle: a rare rotten log dweller, this beetle lives only in wet forest. The only suitable habitat would be WOB *E. obliqua* forest around the SE Class 3 streams, but the species has not been found on site before (no NVA records), and habitat is likely to be effectively conserved through 20m streamside reserves alongside each stream.

Eastern barred bandicoot: we are within the potential range of this species and sightings have been made on the property. However the Threatened Species Adviser endorsed by the Forest Practices Authority and Threatened Species Section does not call for any specific reservation for this species, with standard management practices such as wildlife habitat clumps (eg. as applied to streamside reserves) appropriate.



We would contend that PVA overlay should be applied in our property only to:

- A 100m radius from the two recorded Grey Goshawk nest sites
- (WGL) Eucalyptus globulus wet forest in the narrow TasVeg-mapped strip alongside lower SE edge of paddock and eastern Class 3 streamline (not under the powerline easement or north where previously refutes as an E. obliqua community), as habitat for the Swift parrot.

Forests in the remainder of the two southern titles is a mix of types from dry to wet and with a range of species, however none are identifiable as threatened native vegetation communities, or have been previously identified as locally important through any process of our knowledge.

We are prepared to provide further information and to speak to this representation.

Kind regards,



Amy Robertson

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