2-4 Eden Street
Riverside, Tasmania 7250
Telephone: (03) 6323 9300
Facsimile: (03) 6323 9349

West Tamar COUNCIL

PLANNING APPLICATION FORM

Section 57 & 58

OFFICE USE ONLY		
	Application Number	PA2025417
	Assess No:	A4238
	PID No:	7351508

Applicant Name:	**D.J.McCulloch & Associates**					
Postal Address:						
Contact Phone:	**Home**		**Work**		**Mobile**	
Email Address:						

Planning Application Lodgement Checklist

The following documents have been submitted to support the consideration of this application:

1. A current copy of the property title text, folio plan and schedule of easements ☐
2. A completed application form including a detailed description of the proposal ☐
3. A complete plan set: ☐
   - a) **Floor plans** ☐
   - b) **Elevations** (from all orientations/sides and showing natural ground level and finished surface level) ☐
   - c) **Site Plan** showing: ☐
     - Orientation
     - All title boundaries
     - Location of buildings and structure (both existing and proposed)
     - Setbacks from all boundaries
     - Native vegetation to be removed
     - Onsite services, connections and drainage details (including sewer, water and stormwater)
     - Cut and/or Fill
     - Car parking and access details (including construction material of all trafficable areas)
     - Fence details
     - Contours
4. Other:

If submitting plans in over the counter please ensure they are A3.
All plans must be to scale.

WEST TAMAR COUNCIL

Application Number: «Application_Number»

APPLICANT DETAILS

Applicant Name:	**D.J.McCulloch & Associates PO Box 725, Riverside TAS 7250**

Note: *Full name(s) of person(s) or company making the application and postal address for correspondence.*

LAND DETAILS

Owner/Authority Name: *(as per certificate of title)*	**Michael & Susan James**
Location / Address:	**103 Bridgenorth Road, Legana TAS 7277**
Title Reference:	**F/R 25000/1**
Zone(s):	**Low Density Residential**
Existing Development/Use:	**residential**
Existing Developed Area:	**3.344 ha**

DEVELOPMENT APPLICATION DETAILS

Proposed Use:	Residential: ☐	Visitor Accommodation: ☐	Commercial: ☐	Other: ☐
	Description of Use:			
Development Type:	Building work: ☐	Demolition: ☐	Subdivision: X	Other: ☐
	Description of development: **2 lot subdivision**			
New or Additional Area:	**1.02ha & 2.32ha**			
Estimated construction cost of the proposed development:				
Building Materials:	Wall Type:		Colour:	
	Roof Type:		Colour:	

WEST TAMAR COUNCIL

Application Number: «Application_Number»

SUBDIVISION ☐N/A

Subdivision creating additional lots ☑

Boundary adjustment with no additional lots created ☐

Number of Lots (existing) :	**1**	**Number of Lots (proposed) :**	**2 Lot**
Description:	**Two lots for residential purposes**		
If applying for a subdivision which creates a new road(s), please supply three proposed names for the road(s), in order of preference:			
1.			
2.			
3.			

COMMERCIAL, INDUSTRIAL OR OTHER NON-RESIDENTIAL DEVELOPMENT/USE ☐N/A

Hours of Operation:	Monday / Friday:		To	
	Saturday:		To	
	Sunday:		To	

Existing Car Parking:	
Proposed Car Parking:	

Number of Employees: ***(Existing)***	
Number of Employees: ***(Proposed)***	

Type of Machinery installed:	
Details of trade waste and method of disposal:	

WEST TAMAR COUNCIL

Application Number: «Application_Number»

APPLICANT DECLARATION

Owner: *As the owner of the land, I declare that the information contained in this application is a true and accurate representation of the proposal and I consent to this application being submitted and for Council Officers to conduct inspections as required for the proposal,*

	Signed	*Date*

Applicant: *(if not the owner)* *As the applicant, I declare that I have notified the owner of my intention to make this application* and that *the information contained in this application is a true and accurate representation of the proposal,*

DALLAS McCULLOCH		12/1/26
Name (print)	*Signed*	*Date*

Please Note: If the application involves Crown Land you will need to provide a letter of consent and this form signed by the Minister, or a delegated officer of the Crown with a copy of the delegation.

Crown Consent *(if required)*

Name (print)	*Signed*	*Date*

Chief Executive Officer *(if required)*

	Signed	*Date*

If the subject site is accessed via a right of way, the owner of the ROW must also be notified of the application.

Right of Way Owner: Garry Hawkeswood, Eric Hutchinson & Meagan Camplain

As the applicant, I declare that I have notified the owner of the land encumbered by the Right Of Way, of my intent to lodge this application that will affect their land.

DALLAS McCULLOCH		12/1/26
Name (print)	*Signed*	*Date*

PRIORITY FINAL PLAN

OWNER: GARRY RONALD HAWKESWOOD

FOLIO REFERENCE: F/R 15715/1

GRANTEE: PART 2500 ACRES GRANTED TO JOHN GRIFFITHS

PLAN OF SURVEY

BY SURVEYOR DALLAS McCULLOCH
D.J.McCULLOCH & ASSOCIATES
TREVALLYN, TASMANIA 7250

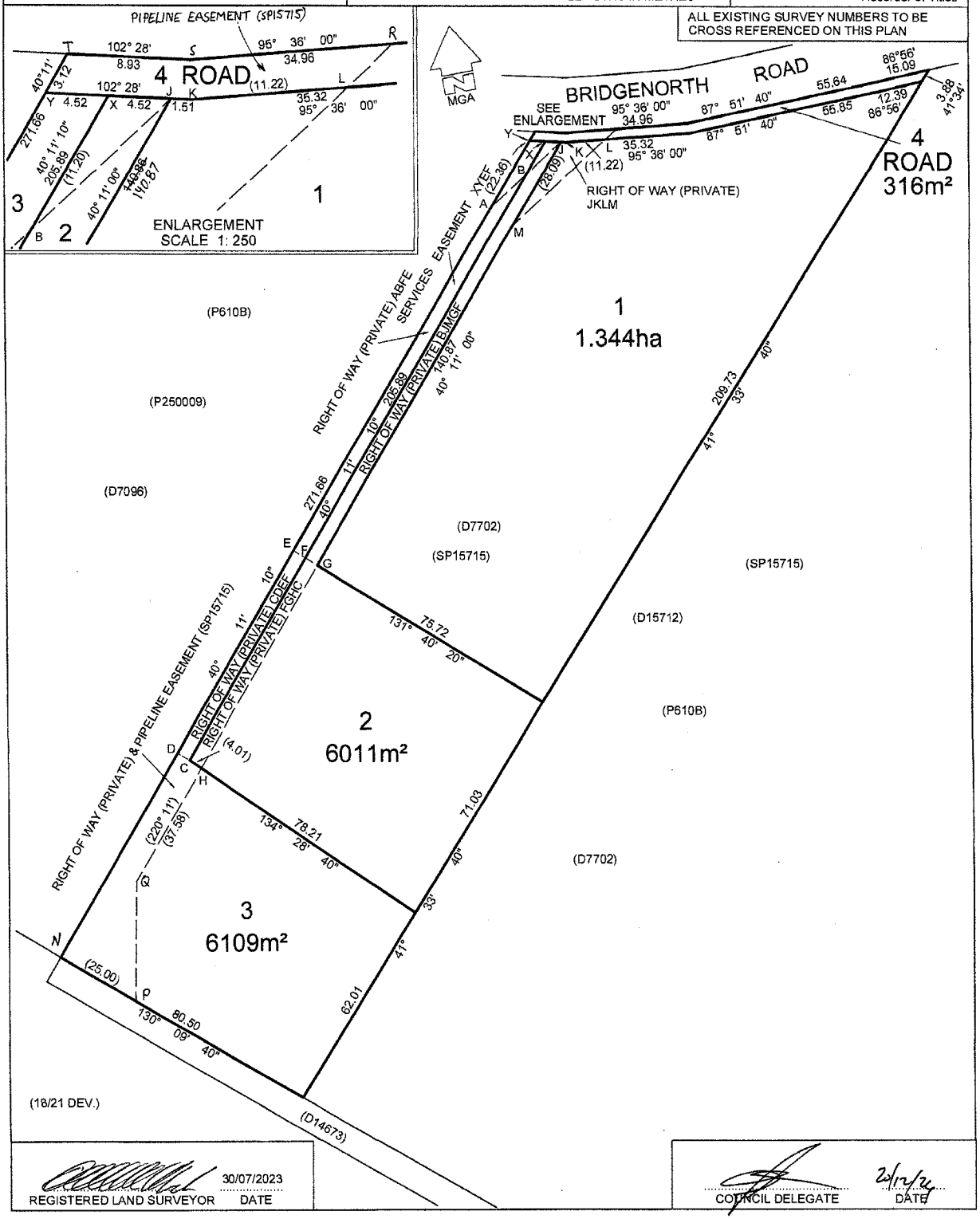
LOCATION
LAND DISTRICT OF DEVON
PARISH OF STANLEY

SCALE 1 : 1000 LENGTHS IN METRES

REGISTERED NUMBER
SP188008

APPROVED
EFFECTIVE FROM 17 JAN 2025
Recorder of Titles

ALL EXISTING SURVEY NUMBERS TO BE CROSS REFERENCED ON THIS PLAN



30/07/2023
REGISTERED LAND SURVEYOR DATE

COUNCIL DELEGATE 26/1/26 DATE

ANNEXURE TO CERTIFICATE OF TITLE / FOLIO OF REGISTER

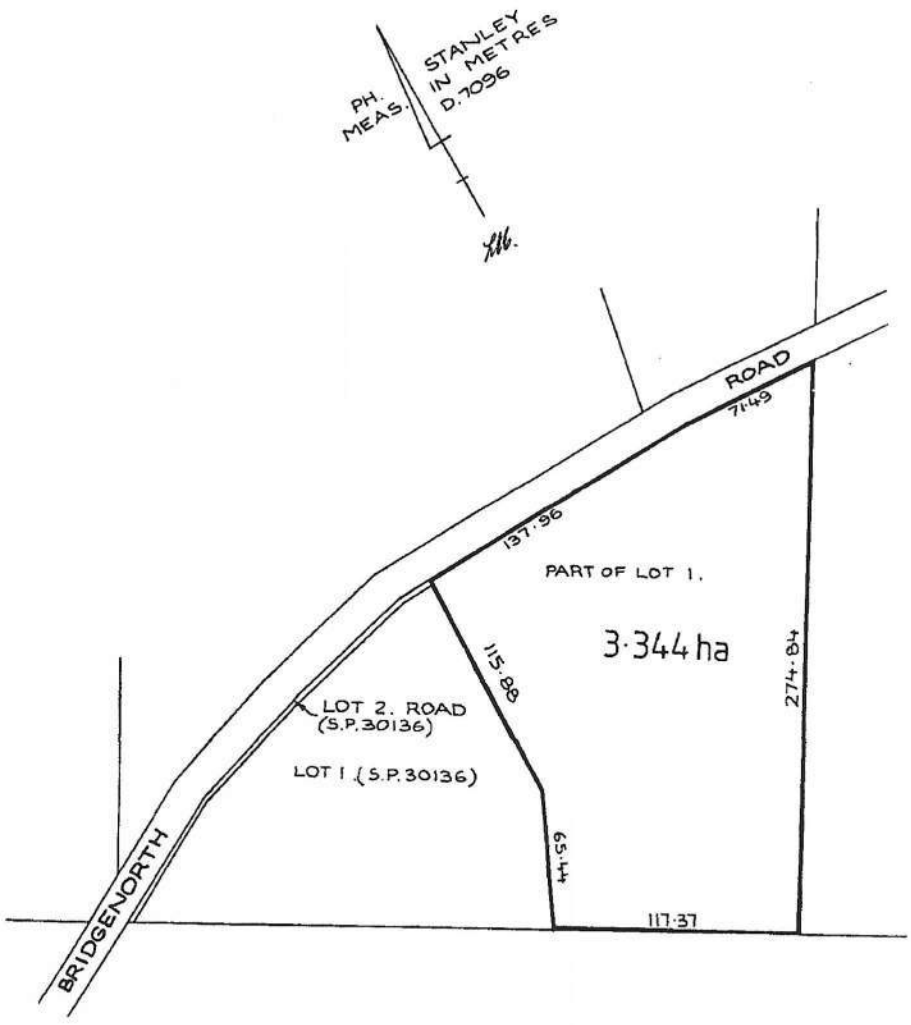
VOL. 4313 FOL. 53

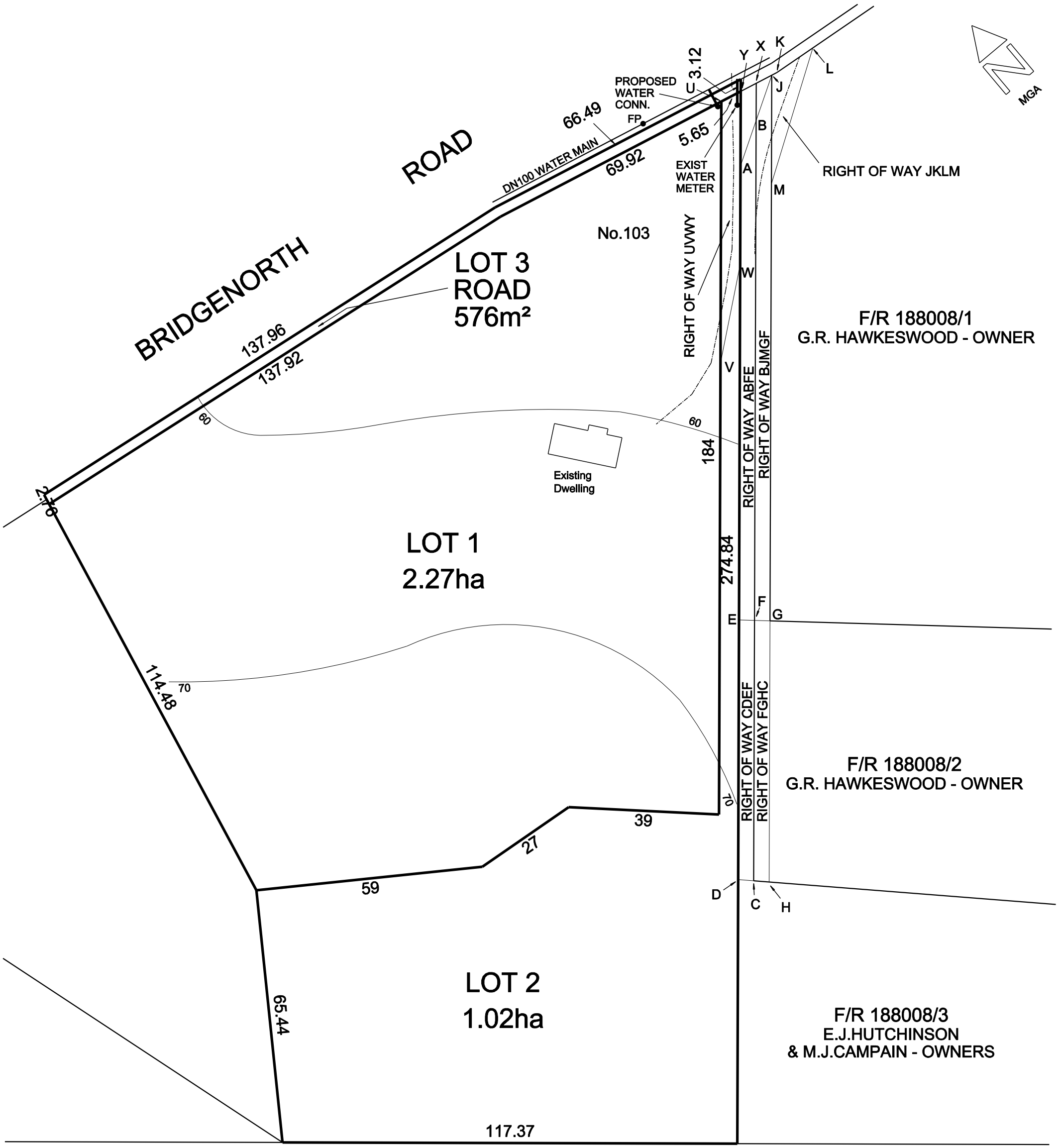
Acting Recorder of Titles

REGISTERED NUMBER

250009

Lot 1 of this plan consists of all the land comprised in the above-mentioned cancelled folio of the Register.





LOT 1 & LOT 2 COMPRISE THE WHOLE OF F/R 250009/1 MICHAEL JAMES - OWNER
ALL DIMENSIONS AND AREAS ARE SUBJECT TO FINAL TITLE SURVEY
LOT 2 WILL HAVE LEGAL RIGHT OF WAY OVER THE EXISTING PRIVATE DRIVEWAY WITHIN IN THE EXISTING ADJOINING RIGHTS OF WAY CREATED BY SP188008
LOT 2 WILL HAVE A SERVICES EASEMENT OVER THAT PART OF F/R 188008/3 LABELLED CDYX
RIGHT OF WAY UVWY OVER LOT 2 TO BENEFIT OF LOT 1

Revision .1 - 12/01/2026 - Lot 3 Road & Right of Way UVWY added

TASWATER NOTES
(1) SUPPLY & INSTALL DN20mm (ID206) HDPE PN16 SDR11 PROPERTY WATER CONNECTION WITH COMPATIBLE WATER METER BELOW GROUND LOW HAZARD BY TASWATER AT DEVELOPERS COST. WATER METER & CONNECTION TO BE LOCATED IN ACCORDANCE WITH TASWATER'S TSA03-MRWA v2.0 SUPPLEMENT

ALL WATER CONNECTIONS ARE TO BE CONSTRUCTED BY TASWATER AT THE DEVELOPERS COST
ALL WORKS ARE TO BE IN ACCORDANCE WITH THE WATER SUPPLY CODE OF AUSTRALIA WSA 03-2011-3.1 VERSION 3.1 MRWA EDITION V2.0 & THE SEWERAGE CODE OF AUSTRALIA MRWA CODE WSA 02-2014-3.1 MRWA VERSION 2 AND TASWATER'S SUPPLEMENTS TO THOSE CODES

D.J.McCulloch & Associates
PO BOX 725
RIVERSIDE
TAS 7250
MOBILE 0417526589
EMAIL:- mcculldj@bigpond.net.au

SUBDIVISION & SERVICES PLAN

103 Bridgenorth Road, Legana
Michael Roy James - Owner
Title Reference - F/R 250009/1
Development Application for Planning Permit
West Tamar Council

SCALE 1:1000 (A3)	D. McCulloch 12/01/2026	PLAN 5625-01.1 DA
JOB No. 1640-2121		

D.J.McCulloch & Associates
Land Surveyors

P.O.BOX 725 Riverside, TAS, 7250

148 West Tamar Road Riverside, TAS, 7250

Mobile: 0417 526589

Email: mcculldj@bigpond.net.au

Our Ref: 5625 Planning WTC

Monday 15th December 2025

Planning Report

Proposed 2 Lot Subdivision

Land at 103 Bridgenorth Road, Legana

Michael & Susan James - Owners

Planning Authority: - West Tamar Council

Planning Scheme: - Tasmanian Planning Scheme

The Proposed Subdivision

It is proposed to subdivide the existing 3.344ha title into 2 lots being 2.32ha & 1.02ha each. The proposed subdivision continues the current use of the subject land.

The land will be subdivided as shown on the Subdivision Plan 5625-01 DA.

Zoning

The whole of the parent title is zoned Low Density Residential under the provisions of the Tasmanian Planning Scheme.

The Subject Land

The subject land is described in Certificate of Title F/R 250009/1

The subject land is partially cleared land with frontage to Bridgenorth Road, a Council maintained public road.

Existing access points off Long Plains Road will be utilised to serve the proposed lots. Physical access to proposed Lot 2 will utilise the existing 20 tonne standard access road passing through adjoining titles on the south–east side of the subject land. The affected adjoining owners have formally agreed to transfer the rights of carriageway to the benefit of the proposed lots.

The formal consent documents are attached hereto.

Compliance with the Development Standards for subdivision in the Low Density Residential Zone

WTAS3.8.1 Lot Design

Acceptable Solutions A1

(a) (i)

The proposal complies with the minimum requirements.

(a) (ii)

The existing building comply with the minimum required setbacks

10.6.1 Lot Design

Performance Criteria P2

All lots have reasonable vehicular access to the lot boundaries or any building area, utilising the existing access points off Bridgenorth Road,

10.6.3 Services

Acceptable Solutions A1 (a)

Each lot can be connected to a full water supply service.

Performance Criteria P2

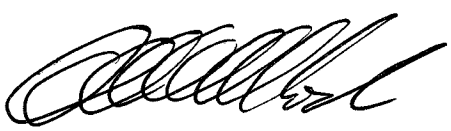
Each lot is capable of accommodating an adequate on-site wastewater system.

Performance Criteria P3

Each lot is capable of accommodating an adequate on-site stormwater management system having due regard to items (a), (b), (c), (d), (e) & (f) of the Performance Criteria.

GENERAL

- This development complies with the objectives of the Tasmanian Planning Scheme and satisfies the purposes of the Low Density Residential Zone thereof.

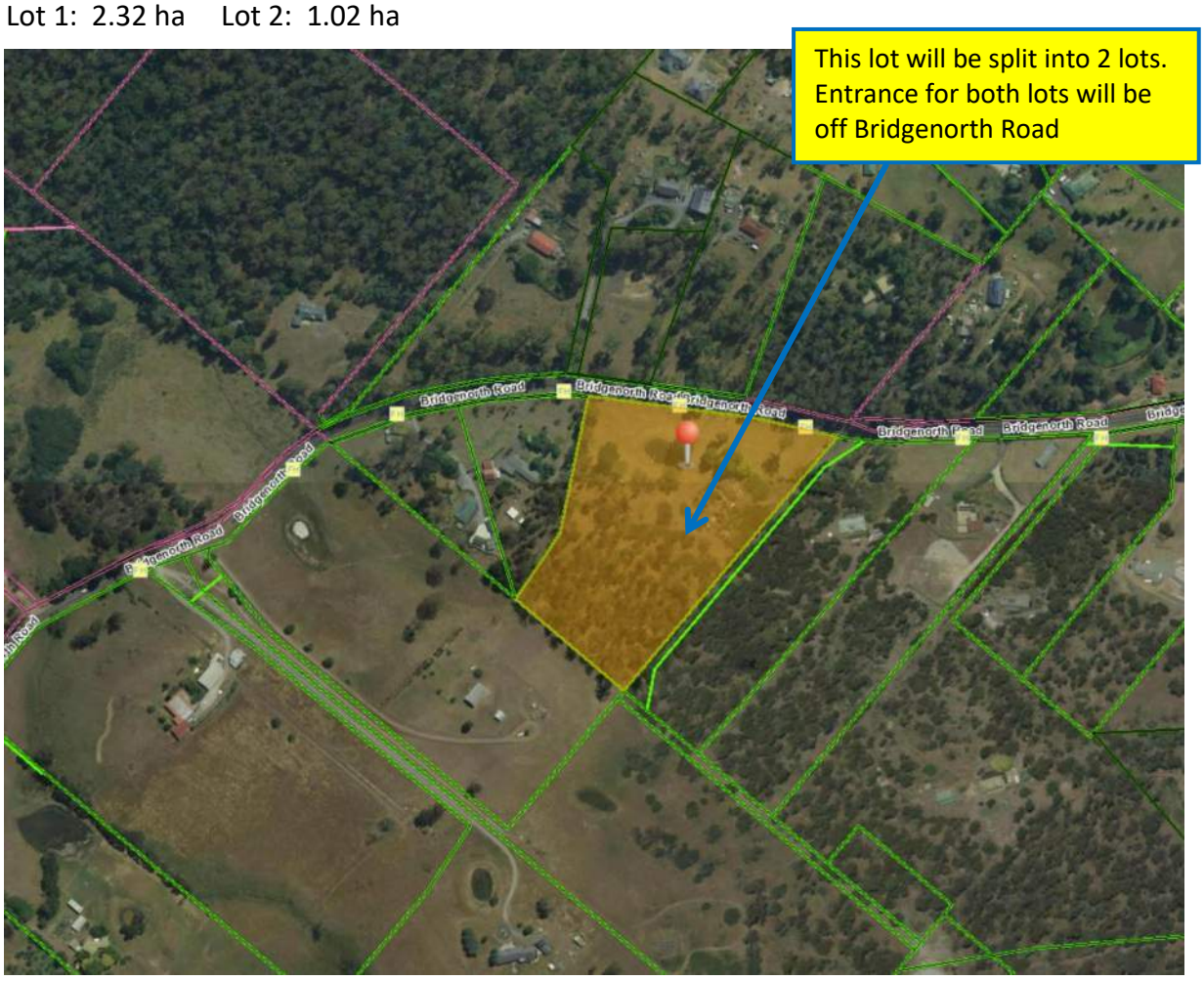


Dallas McCulloch
Registered Land Surveyor
15/12/2025

Autumn Leaves Consulting
Bushfire Hazard Assessment & Management Plans
leanne.a.jordan@gmail.com
Mobile 0417 313 029
20 Richings Drive YOUNGTOWN TAS 7249
ABN 46286311768

Bushfire Report
103 Bridgenorth Rd LEGANA TAS 7277
PID: 7351508 (Volume 250009 Folio 1)

This lot will be split into two lots as follows:
Lot 1: 2.32 ha Lot 2: 1.02 ha



Report prepared for:

Client: Michael Roy JAMES
103 Bridgenorth Rd
LEGANA TAS 7277

Report prepared by: Leanne Jordan *Report Date:* 12th December 2025

Accreditation Number: BFP - 141

Report Reference: ALC-BFM 2024/16 *Version:* 3.0

TABLE OF CONTENTS

1. Summary:

Client:	Michael Roy JAMES
Property Location:	103 Bridgenorth Rd LEGANA TAS 7277
Property ID:	PID: 7351508 (Volume 250009 Folio 1)
Lot Size:	Lot 1: Proposed to be 2.32 ha Lot 2: Proposed to be 1.02 ha
Council:	West Tamar Council
Planning Zone	Low Density Residential
Surrounding Zones	Low Density Residential zone surrounds this property
Type of building work:	New subdivision – 2 lots
Description of the building work:	Proposed new subdivision – this lot is to be split into 2 lots
Assessed BAL	Bushfire Attack Level BAL-19 for Lot 1 & 2

2. Introduction

This Bushfire Attack Level (BAL) assessment is for a proposed new subdivision of a lot to be split into two lots at 103 Bridgenorth Rd, LEGANA TAS 7277 PID: 7351508 Volume 250009 Folio 1. This Bushfire Attack Level (BAL) Report and Bushfire Management Plan (BHMP) have been prepared for submission with the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards - Subdivisions.*

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3. Purpose

The purpose of this bushfire assessment report is to identify the Bushfire Attack Level (BAL) in accordance with AS3959-2018 Construction of Buildings in Bushfire-Prone Areas.

The BAL will enable the appropriate construction method and applicable construction requirements for the proposed building works to be designed in accordance with AS3959-2018 Construction of Buildings in Bushfire-Prone Areas. Building specifications for BAL-19 are detailed in AS3595-2018.

An assessment and comments in relation to *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivisions* will be provided for the proposal.

Bushfire Attack Level (BAL)	Predicted Bushfire Attack and Exposure Level
BAL-LOW	*Insufficient risk to warrant specific construction requirements*
BAL-12.5	*Ember Attack*
BAL-19	*Increasing levels of ember attack and burning debris ignited by windborne embers together with increasing heat flux between 12.5 and 19 kW m2 (kilowatts per square metre)*
BAL-29	*Increasing levels of ember attack and burning debris ignited by windborne embers together with increasing heat flux between 19 and 29 kW m2*
BAL-40	*Increasing levels of ember attack and burning debris ignited by windborne embers together with increasing heat flux with the increased likelihood of exposure to flames*
BAL FZ (Flame Zone)	*Direct exposure to flames from fire front in addition to heat flux and ember attack*

4. Assessment

A desktop and onsite assessment were carried out on the 2nd April 2024, with review & updates completed on 10.12.2025. The referenced documents are appended, these include aerial topography images from Listmap, onsite photos and subdivision plans from D.J. McCulloch & Associates - Job Number 1640-2121.

5. C13.6.1 Provision of hazard management areas

Tasmanian Planning Scheme
C13 BUSHFIRE-PRONE AREAS CODE
C13.6 Development Standards for Subdivision
C13.6.1 Subdivision: Provision of hazard management areas

Objective: *Subdivision provides for hazard management areas that:*
(a) facilitate an integrated approach between subdivision and subsequent building on a lot;
(b) provide for sufficient separation of building areas from bushfire-prone vegetation to reduce the radiant heat levels, direct flame attack and ember attack at the building area; and
(c) provide protection for lots at any stage of a staged subdivision.

Acceptable solutions:	***Response***
(a) TFS or an accredited person certifies that there is an insufficient increase in risk from bushfire to warrant the provision of hazard management areas as part of a subdivision; or	Not applicable
(b) The proposed plan of subdivision: *(i) shows all lots that are within or partly within a bushfire-prone area, including those developed at each stage of a staged subdivision;* *(ii) shows the building area for each lot;* *(iii) shows hazard management areas between bushfire-prone vegetation and each building area that have dimensions equal to, or greater than, the separation distances required for BAL 19 in Table 2.6 of Australian Standard AS 3959:2018 Construction of buildings in bushfire-prone areas; and* *(iv) is accompanied by a bushfire hazard management plan that addresses all the individual lots and that is certified by the TFS or accredited person, showing hazard management areas equal to, or greater than, the separation distances required for BAL 19 in Table 2.6 of Australian Standard AS 3959:2018 Construction of buildings in bushfire-prone areas; and*	Appendix 6 shows the subdivision of the two lots and the bushfire management plan is detailed in Appendix 5. Currently Lot 2 is vacant land, with woodland vegetation covering it, whilst Lot 1 has an existing dwelling on the lot. The management plan details the existing building area for Lot 1, and the proposed building area for Lot 2 and the management of a HMA of both lots to achieve a Bushfire Attack Level (BAL) rating of BAL 19. The building area shown on Lot 2 is not going to all be built on, but rather shows some flexibility of the area that can be built on. For Lot 2 the distances of the building area are influenced by the vegetation surrounding the lot. Whilst the setbacks for the HMA from a proposed future habitable building on the lot takes into consideration that the lots are currently woodlands, and some of that vegetation may be retained, thus this has been considered in the management of the required HMA. For Lot 2 it is important to note that the lot to the South-East has been cleared and is no longer woodlands (as shown on aerial), but

	rather is now grasslands – as can be seen in the photos in Appendix 2 (page 28 of the report). Section 6 of this report details the BAL assessment. Each lot must establish and manage the Hazard Management Area as detailed to ensure ongoing compliance for the BAL rating, for Lot 1 this needs to be done prior to the issuing of titles, and for Lot 2 prior to the construction of any habitable building on the lot.
(c) If hazard management areas are to be located on land external to the proposed subdivision the application is accompanied by the written consent of the owner of that land to enter into an agreement under section 71 of the Act that will be registered on the title of the neighbouring property providing for the affected land to be managed in accordance with the bushfire hazard management plan.	*n/a – lots in subdivision will manage the hazard management areas*

6. Bushfire Attack Level Assessment

6.1. Fire Danger Index (FDI):

The Fire Danger Index (FDI) is a measure of the probability of a bushfire starting, its rate of spread, intensity and difficulty of suppression according to various combinations of temperature, relative humidity, wind speed and estimate of fuel state, all of which is influenced by daily rainfall and the time elapsed since the last rainfall. *The FDI as per Table 2.1 AS3959-2018 for Tasmania is 50.*

6.2. Site Vegetation Type & Distance:

Vegetation surrounding the site to a distance of 100m from the proposed building has been considered.

Distance to the vegetation is measured horizontally from the edge of the vegetation (closest to the building site) to the external wall of the proposed building, or for parts of the building that do not have external walls (including carports, verandas, decks, landings, deck ramps) to the supporting posts or columns.

Lot 2 is covered in woodland vegetation, in trying to determine proposed building setbacks the woodland vegetation has been considered and from a potential building area, the vegetation at the boundary of the lot has been considered. If the woodland is cleared to construct a future proposed dwelling the setbacks may be reduced accordingly. This would require a new assessment by an accredited bushfire assessment practitioner.

6.3. Slope of the land under the vegetation

The slope of the land under the vegetation has a direct influence on the severity of a bushfire and consequently is considered in assessing your site's BAL. Bushfires have a tendency to move up more rapidly than down hills. In determining the slope, it is the slope under the classified vegetation in relation to the building that is measured, not the slope between the classified vegetation and the building.

6.4. Bushfire Attack Level (BAL):

The BAL takes into consideration a number of factors including the Fire Danger Index (FDI), the slope of the land, types of surrounding vegetation and its proximity to any building.

6.5. Overall Bushfire Attack Level (BAL):

BAL Level as per Table 2.6 AS3959-2018

The plan demonstrates that both lots within the bushfire prone overlay can provide for BAL-19 setbacks. The existing dwelling on Lot 1 and the indicative building area on Lot 2 allows for management of vegetation within each lot of the subdivision, independently of each other, to achieve the BAL-19 rating required setbacks.

The assessed Bushfire Attack Level (BAL):

Once the Hazard Management Area (HMA) stipulated is implemented and maintained, ensuring both initial and ongoing compliance:

Lot 1 = **BAL-19** Lot 2 = **BAL-19**

The construction requirements are set out in Section 3 & 6 of the Australian Standard AS3959-2018 Construction of Buildings in Bushfire-Prone Areas for Bushfire Attack Level 19 (BAL – 19).

BAL–19 As per AS 3959-2018 Bal-19 there are increasing levels of ember attack and burning debris ignited by windborne embers together with increasing heat flux between 12.5 and 19 kW m2 (kilowatts per square metre).

☐ *Lot 1:*

Bushfire Attack Level (BAL)

Step 1: Relevant fire danger index: (see clause 2.2.2) FDI 50 [X]

Step 2: Assess the vegetation within 100m in all directions (tick relevant group)

Note 1: Refer to Table 2.3 and Figures 2.3 & 2.4 for description and classification of vegetation.

Note 2: If there is no classified vegetation within 100m of the site then the BAL is LOW for that part of the site.

Vegetation classification (see Table 2.3)	North ☐ North-East [X]	South ☐ South-West [X]	East ☐ South-East [X]	West ☐ North-West [X]
Group A Forest	71 metres to forest			
Group B Woodland		37 metres to woodlands	30 metres to woodlands	
Group C Shrub-land				
Group D Scrub				
Group E Mallee/Mulga				
Group F Rainforest				
Group G (FDI 50) Grassland	20 metres to grasslands			10 metres to grasslands
Group H Managed Land				
Exclusions (where applicable)	Strikeout relevant paragraph descriptor from clause 2.2.3.2.			
	(a) (b) (c) (d) (e) (f)	(a) (b) (c) (d) (e) (f)	(a) (b) (c) (d) (e) (f)	(a) (b) (c) (d) (e) (f)

Step 3: Distance of the site from classified vegetation (see clause 2.2.4)

Distance to classified vegetation	Show distances in metres			
	20 metres to grasslands	37 metres to woodlands	30 metres to woodlands	10 metres to grasslands

Step 4: Determine the effective slope of land under the classified vegetation

Effective slope	Upslope			
Slope under the classified vegetation	Upslope/0° ☐	Upslope/0° [X]	Upslope/0° [X]	Upslope/0° [X]
	North ☐ North-East [X]	South ☐ South-West [X]	East ☐ South-East [X]	West ☐ North-West [X]
	Downslope			
	>0 to 5 [X]	>0 to 5 ☐	>0 to 5 ☐	>0 to 5 ☐
	>5 to 10 ☐	>5 to 10 ☐	>5 to 10 ☐	>5 to 10 ☐
	>10 to 15 ☐	>10 to 15 ☐	>10 to 15 ☐	>10 to 15 ☐
	>15 to 20 ☐	>15 to 20 ☐	>15 to 20 ☐	>15 to 20 ☐
BAL value for each side of the site	BAL-12.5	BAL-12.5	BAL-12.5	BAL-19
ASSESSED BAL LEVEL	The assessed Bushfire Attack Level (BAL) for the site (Lot 1 with existing dwelling) is "BAL-19"			

Lot 2 this assessment is based on the proposed Building Area, currently all of lot is woodlands:

Bushfire Attack Level (BAL) **Step 1: Relevant fire danger index: (see clause 2.2.2)** FDI 50 [X] **Step 2: Assess the vegetation within 100m in all directions (tick relevant group)** Note 1: Refer to Table 2.3 and Figures 2.3 & 2.4 for description and classification of vegetation. Note 2: If there is no classified vegetation within 100m of the site then the BAL is LOW for that part of the site.				
Vegetation classification (see Table 2.3)	North [ ] North-East [X]	South [ ] South-West [X]	East [ ] South-East [X]	West [ ] North-West [X]
Group A Forest				
Group B Woodland	18 metres to woodlands	18 metres to woodlands	18 metres to woodlands	23 metres to woodlands
Group C Shrub-land				
Group D Scrub				
Group E Mallee/Mulga				
Group F Rainforest				
Group G (FDI 50) Grassland		11 metres to grasslands		
Group H Managed Land				
Exclusions (where applicable)	Strikeout relevant paragraph descriptor from clause 2.2.3.2.			
	(a) (b) (c) (d) (e) (f)	(a) (b) (c) (d) (e) (f)	(a) (b) (c) (d) (e) (f)	(a) (b) (c) (d) (e) (f)
Step 3: Distance of the site from classified vegetation (see clause 2.2.4)				
Distance to classified vegetation	Show distances in metres			
	18 metres to woodlands	11 metres to grasslands	18 metres to woodlands	23 metres to woodlands
Step 4: Determine the effective slope of land under the classified vegetation				
Effective slope	Upslope			
Slope under the classified vegetation	Upslope/0° [ ]	Upslope/0° [ ]	Upslope/0° [ ]	Upslope/0° [ ]
	North [ ] North-East [X]	South [ ] South-West [X]	East [ ] South-East [X]	West [ ] North-West [X]
	Downslope			
	>0 to 5 woodlands [X]	>0 to 5 [X]	>0 to 5 [X]	>0 to 5 [ ]
	>5 to 10 grasslands [X]	>5 to 10 [ ]	>5 to 10 [ ]	>5 to 10 [X]
	>10 to 15 [ ]	>10 to 15 [ ]	>10 to 15 [ ]	>10 to 15 [ ]
	>15 to 20 [ ]	>15 to 20 [ ]	>15 to 20 [ ]	>15 to 20 [ ]
BAL value for each side of the site	BAL-19	BAL-19	BAL-19	BAL-19
ASSESSED BAL LEVEL	The assessed Bushfire Attack Level (BAL) for Lot 2 is "BAL-19"			

7. C13.6.2 Public and fire fighting access

Tasmanian Planning Scheme

C13 BUSHFIRE-PRONE AREAS CODE

C13.6 Development Standards for Subdivision

C13.6.2 Public and fire fighting access

Objective: *That access roads to, and the layout of roads, tracks and trails, in a subdivision:*
(a) allow safe access and egress for residents, fire fighters and emergency service personnel;
(b) provide access to the bushfire-prone vegetation that enables both property to be defended when under bushfire attack and for hazard management works to be undertaken;
(c) are designed and constructed to allow for fire appliances to be manoeuvred;
(d) provide access to water supplies for fire appliances; and
(e) are designed to allow connectivity, and where needed, offering multiple evacuation points.

Acceptable solutions:	***Response***
A1 (a) TFS or an accredited person certifies that there is an insufficient increase in risk from bushfire to warrant specific measures for public access in the subdivision for the purposes of fire fighting; or	
(b) A proposed plan of subdivision showing the layout of roads, fire trails, and the location of property access to building areas is included in a bushfire hazard management plan that: *(i) demonstrates proposed roads will comply with Table C13.1, proposed private accesses will comply with Table C13.2 and proposed fire trails will comply with Table C13.3; and* *(ii) is certified by the TFS or accredited person.*	No roads are required in the subdivision. The driveway for Lot 1 is existing and is off Bridgenorth Road. Lot 2's driveway will be provided by way of existing ROW of adjoining lots South-East of the lot, being C/T 188008/1-3, and is also off Bridgenorth Road. Both driveways will need to comply with Table C13.2 as detailed below. Lot 1 is an existing driveway and is approximately 75 metres in length, however it is not required to provide access to a fire fighting water source. The width and clearance of the driveway are not compliant with the required standard of *Tasmanian Planning Scheme, C13.6.2 Public fire fighting access, Table C13.2(B).* It is recommended that as part of maintenance, to improve where possible and work towards these standards. However the access is operationally functional and is not required to be fully upgraded. Lot 2's driveway is an existing ROW of adjoining lots, which Lot 2 now has legal consent to utilise. The driveway will be in excess of 30 metres in length and is required to provide access to an onsite firefighting water source, and in addition provides access to 3 properties. Therefore, access to Lot 2 needs to meet the requirements of

	Tasmanian Planning Scheme C13.6.2 Public fire fighting access, Table C13.2(B) & (D). The access for Lot 2 will utilise the existing reciprocal Right of Way (ROW) on the adjoining lots to the SE of Lot 2. The full access width of 8 metres of the dual ROW access provides suitable width to allow passing of vehicles when required, therefore meeting the passing bay requirements of the Table C13.2 (D) for the length of the shared ROW access – some 214+ metres. The ROW currently meets the requirements of Table C13.2 (B) & (D) and needs to be regularly maintained to ensure ongoing compliance. The component of the driveway for Lot 2 which will be extending within the lot, requires continued compliance with Table C13.2 (B) to be met. Safe access for emergency services including firefighting appliances, is crucial for effective firefighting.

Table C13.2 Standards for Property Access:

B. Property access length is 30m or greater; or access is required for a fire appliance to a fire fighting water point. *The following design and construction requirements apply to property access:*

(a) all-weather construction;
(b) load capacity of at least 20t, including for bridges and culverts;
(c) minimum carriageway width of 4m;
(d) minimum vertical clearance of 4m;
(e) minimum horizontal clearance of 0.5m from the edge of the carriageway;
(f) cross falls of less than 3 degrees (1:20 or 5%);
(g) dips less than 7 degrees (1:8 or 12.5%) entry and exit angle;
(h) curves with a minimum inner radius of 10m;
(i) maximum gradient of 15 degrees (1:3.5 or 28%) for sealed roads, and 10 degrees (1:5.5 or 18%) for unsealed roads; and
(j) terminate with a turning area for fire appliances provided by one of the following:
(i) a turning circle with a minimum outer radius of 10m; or
(ii) a property access encircling the building; or
(iii) a hammerhead "T" or "Y" turning head 4m wide and 8m long.

D. Property access length is greater than 30m, and access is provided to 3 or more properties. *The following design and construction requirements apply to property access:*

(a) the requirements for B above; and
(b) passing bays of 2m additional carriageway width and 20m length provided every 100m

On site:

Lot 1:

Driveway and entrance off Bridgenorth Road

Existing sealed driveway

Driveway is sealed

Turning area

Lot 2:

Existing ROW will be utilised for access to Lot 2 There is reciprocal ROW access for current lots therefore, providing sufficient width for passing vehicles

Entrance & driveway to Lot 2 from the ROW is yet to be constructed and will need to comply with Table C13.2 (B) & (C).

8. C13.6.3 Provision of water supply for fire fighting purposes

Tasmanian Planning Scheme

C13 BUSHFIRE-PRONE AREAS CODE

C13.6 Development Standards for Subdivision

C13.6.3 Provision of water supply for fire fighting purposes

Objective: That adequate, accessible and reliable water supply for the purposes of fire fighting can be demonstrated at the subdivision stage to allow for the protection of life and property associated with the subsequent use and development of bushfire-prone areas.

Acceptable solutions:	***Response***
A1 In areas serviced with reticulated water by the water corporation: *(a) TFS or an accredited person certifies that there is an insufficient increase in risk from bushfire to warrant the provision of a water supply for fire fighting purposes;* *(b) A proposed plan of subdivision showing the layout of fire hydrants, and building areas, is included in a bushfire hazard management plan approved by the TFS or accredited person as being compliant with Table C13.4; or* *(c) A bushfire hazard management plan certified by the TFS or an accredited person demonstrates that the provision of water supply for fire fighting purposes is sufficient to manage the risks to property and lives in the event of a bushfire.*	*(b)* This proposal shows Lot 1 will need to comply with requirements of provision of reticulated water supply for fire fighting purposes as outlined in Table C13.4 – see below. There is a fire hydrant on Bridgenorth Road which will service the existing dwelling. It is approximately 11 metres from the front boundary near the dwelling. The fire plug is within 120 metres, as a hose lay, to the furthest point of the dwelling onsite when the pedestrian access gate at the boundary front fence line near the FP is installed, in addition to a second pedestrian access gate from the front paddock into the area surrounding the house. These two gates will allow sufficient access to the FP, providing a hose lay reach of 97 metres to the furthest point of the existing dwelling. These gates will need to be installed prior to the issuing of titles. Adequate and available water supply is critical for effective firefighting.
A2 In areas that are not serviced by reticulated water by the water corporation: *(a) The TFS or an accredited person certifies that there is an insufficient increase in risk from bushfire to warrant provision of a water supply for fire fighting purposes;* *(b) The TFS or an accredited person certifies that a proposed plan of subdivision demonstrates that a static water supply, dedicated to fire fighting, will be provided and located compliant with Table C13.5; or* *(c) A bushfire hazard management plan certified by the TFS or an accredited person demonstrates that the provision of water supply for fire fighting purposes is sufficient to manage the risks to property and lives in the event of a bushfire.*	(b) This proposal shows Lot 2 will need to comply with requirements of provision of static water supply for fire fighting purposes as outlined in Table C13.5 – see below. Adequate and available water supply is critical for effective firefighting.

Lot 1 needs to meet the following table:

Table C13.4 Reticulated Water Supply for Fire Fighting:

A. Distance between building area to be protected and water supply.

The following requirements apply:

(a) the building area to be protected must be located within 120m of a fire hydrant; and

(b) the distance must be measured as a hose lay, between the fire fighting water point and the furthest part of the building area.

B. Design criteria for fire hydrants

The following requirements apply:

(a) fire hydrant system must be designed and constructed in accordance with TasWater Supplement to Water Supply Code of Australia WSA 03 – 2011-3.1 MRWA 2nd Edition; and

(b) fire hydrants are not installed in parking areas.

C. Hardstand

A hardstand area for fire appliances must be provided:

(a) no more than 3m from the hydrant, measured as a hose lay;

(b) no closer than 6m from the building area to be protected;

(c) with a minimum width of 3m constructed to the same standard as the carriageway; and

(d) connected to the property access by a carriageway equivalent to the standard of the property access.

Lot 2 needs to meet the following table:

Table C13.5 Static water supply for fire fighting:

A. Distance between building area to be protected and water supply.

The following requirements apply:

(a) the building area to be protected must be located within 90m of the fire fighting water point of a static water supply; and

(b) the distance must be measured as a hose lay, between the fire fighting water point and the furthest part of the building area.

B. Static Water Supplies

The static water supply:

(a) may have a remotely located offtake connected to the static water supply;

(b) may be a supply for combined use (fire fighting and other uses) but the specified minimum quantity of fire fighting water must be available at all times;

(c) must be a minimum of 10,000L per building area to be protected. This volume of water must not be used for any other purpose including fire fighting sprinkler or spray systems;

(d) must be metal, concrete or lagged by non-combustible materials if above ground; and

(e) if a tank can be located so it is shielded in all directions in compliance with section 3.5 of *Australian Standard AS 3959-2018 Construction of buildings in bushfire-prone areas*, the tank may be constructed of any material provided that the lowest 400mm of the tank exterior is protected by:

    (i) metal;

    (ii) non-combustible material; or

    (iii) fibre-cement a minimum of 6mm thickness.

C. Fittings, pipework and accessories (including stands and tank supports)

Fittings and pipework associated with a fire fighting water point for a static water supply must:

(a) have a minimum nominal internal diameter of 50mm;
(b) be fitted with a valve with a minimum nominal internal diameter of 50mm;
(c) be metal or lagged by non-combustible materials if above ground;
(d) if buried, have a minimum depth of 300mm [S1];
(e) provide a DIN or NEN standard forged Storz 65mm coupling fitted with a suction washer for connection to fire fighting equipment;
(f) ensure the coupling is accessible and available for connection at all times;
(g) ensure the coupling is fitted with a blank cap and securing chain (minimum 220mm length);
(h) ensure underground tanks have either an opening at the top of not less than 250mm diameter or a coupling compliant with this Table; and
(i) if a remote offtake is installed, ensure the offtake is in a position that is:
    (i) visible;
    (ii) accessible to allow connection by fire fighting equipment;
    (iii) at a working height of 450 – 600mm above ground level; and
    (iv) protected from possible damage, including damage by vehicles.

D. Signage for static water connections.

The fire fighting water point for a static water supply must be identified by a sign permanently fixed to the exterior of the assembly in a visible location. The sign must comply with:

(a) water tank signage requirements within *Australian Standard AS 2304-2019 Water storage tanks for fire protection systems*; or
(b) *Water Supply Signage Guideline*, version 1.0, Tasmania Fire Service, February 2017.

E. Hardstand

A hardstand area for fire appliances must be:

(a) no more than 3m from the fire fighting water point, measured as a hose lay (including the minimum water level in dams, swimming pools and the like);
(b) no closer than 6m from the building area to be protected;
(c) a minimum width of 3m constructed to the same standard as the carriageway; and
(d) connected to the property access by a carriageway equivalent to the standard of the property access.

On Site:

Lot 1:

There is a fire plug (FP) on Bridgenorth Road, it is located approximately 11 metres North-West from the front boundary. This FP will provide the required firefighting water supply for Lot 1, as it is within 120m to the furthest point of the existing dwelling once the required pedestrian gates are installed. These pedestrian gates will be provided directly in line with the FP outlet on the front boundary, with the second pedestrian gate to provide direct access from the front paddock to the area surrounding the existing dwelling. These two gates will provide the access that emergency service personnel require, and will provide the required distance to safely provide fire fighting services. The hose lay between the FP and the furthest point of the existing dwelling (via the use of the pedestrian gates) is 97 metres.

The fire plug is owned and maintained by TasWater. The roadway on Bridgenorth Road will act as the handstand area for fire appliances to access the fire plug.

Lot 1 Fire plug on Bridgenorth Road – 11 metres from driveway

Lot 2:

Lot 2 will require a static firefighting water supply. The specific fire-fighting water tank will need to be installed onsite – location to be determined. The tank, water connection, fittings, pipework and accessories need to comply with the requirements of *Table C13.5 Static Water Supply for Firefighting* of the *Tasmanian Planning Scheme, as* outlined above.

Signage for the firefighting water supply is required which complies with AS 2304-2019. In addition, suitable access to the static water supply and hardstand area needs to meet the Requirements of *Table C13.2 Standards for property access* of the *Tasmanian Planning Scheme.*

9. Assessment

The building sites have been assessed as per the standards of AS3959-2018 Construction of Buildings in Bushfire-prone Areas. A desktop and onsite assessment were conducted on the 2nd April 2024, with report updated on 6th June 2024, with final updates made on 12th December 2025. The existing dwelling on Lot 1 has been rated at *BAL-19*, and the proposed building area for Lot 2 has been rated at *BAL-19*, when recommendations in the Bushfire Hazard Management Plan are implemented.

The implementation of the Hazard Management Area (HMA) in its entirety for Lot 1 needs to be established and managed as a Hazard Management Area, prior to issuing of any titles. Whilst the implementation of the Hazard Management Area (HMA) in its entirety for Lot 2 needs to be established and managed as a Hazard Management Area, prior to construction of any habitable building on the lot.

Date of assessment: 12th December 2025

Assessor's Name: Leanne Jordan

Assessor's Accreditation: BFP - 141 Scope: 1, 2, 3A & 3B

Assessor's contact number: Office: (03) 6343 2183– Mobile: 0417 313 029

10. References

- Standards Australia (2018). AS 3959 – *Construction of Buildings in Bushfire Prone Areas*, Standards Australia International Ltd, Sydney.
- *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivision.*
- Aerial photos, LISTmap, Australia, viewed 2nd April 2024 http://maps.thelist.tas.gov.au/listmap/app/list/map

Disclaimer:
This report only deals with potential bushfire risk and all other statutory assessments are outside this report. All information provided was as at the time of the inspection of the site. This report is not to be used for further or future development of the site other than what has been provided by the plans attached. This assessment and management plan do not guarantee the building will survive a bushfire.

Signed:

Date: 12th December 2025

Certificate Number ALC-BFM 2024/16

11. Bushfire Hazard Management Plan Notes

A Hazard Management Area will be developed within and up to the property boundaries. Existing vegetation needs to be strategically modified and then maintained within this area in accordance with the Bushfire Hazard Management Plan to achieve the following outcomes:

- *to reduce the quantity of windborne sparks and embers reaching buildings;*
- *to reduce radiant heat at the building; and*
- *to halt or check direct flame attack.*

It is a requirement of the West Tamar Council that a Bushfire assessment is undertaken as per the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivisions* to provide a Bushfire Hazard Management Plan for the proposed development.

A Hazard Management Area (HMA) will be developed within and up to the property boundaries to provide access to a fire front for firefighting, which is maintained in a minimal fuel condition and in which there are no other hazards present that will significantly contribute to the spread of a bushfire. The HMA includes the area from the external wall and up to the title boundaries on all elevations.

Each lot must establish and manage the Hazard Management Area (HMA) in its entirety, Lot 1's HMA needs to be developed prior to the issuing of any titles, whilst the HMA for Lot 2 needs to be developed prior to the construction of any habitable building on the lot and then maintained in perpetuity by the respective owners.

In addition, provision of a suitable access (See S11.4 below) and water (see S 11.5 below) for Lot 2 is required. The provision of access and water needs to be implemented prior to construction and then maintained in perpetuity by the respective owners.

The water supply for fire fighting for Lot 1 will be provided by the existing fire plug on Bridgenorth Road and whilst the access for Lot 1 is not fully compliant with the Directors Determination, the access is operationally functional and therefore is not required to be upgraded.

Lot 1:
The assessable vegetation greater than 1 hectare and within 100 metres of the development will be managed within the boundary at the minimum point for greater than:

- 20 metres to the North-East,
- 37 metres to the South-West,
- 30 metres to the South-East,
- 10 metres to the North-West.

This is measured horizontally from the external walls of the existing dwelling onsite and within the property boundaries.

Lot 2:
The assessable vegetation greater than 1 hectare and within 100 metres of the development will be managed within the boundary at the minimum point for greater than:

- 18 metres to the North-East,
- 18 metres to the South-West,
- 18 metres to the South-East,
- 23 metres to the North-West.

This is measured horizontally from the external walls of any proposed dwelling onsite and within the property boundaries.

The HMA will be achieved by adoption of the following strategies:

11.1. Maintenance of Fuel Management Area:

It is the responsibility of the property owner to maintain and manage the landscaping in accordance with the Bushfire Hazard Management Plan and the current Guidelines for Development in Bushfire-Prone Areas of Tasmania.

This area is to be regularly managed and maintained. Landscaping in this area will be minimised:

- grass maintained to a height of a maximum 100mm, with fuel loads kept to less than 2 tonnes per hectare which will be maintained at this level.
- pathways to 1 metre surrounding the dwelling, and landscaping material, will be non-combustible (stone, pebbles etc.).
- the total shrub cover will be a maximum of 20% of the available area.
- there will be a clear space from the dwelling of at least four (4) times the mature height of any shrubs planted.
- shrubs will not be planted in clumps, this to avoid build-up of debris and dead vegetation materials.

11.2. Landscaping:

- all paths and area within 1 metre of the proposed development is to be of a non-combustible landscaping design (paving, stone, pebbles, concrete, etc.)
- vegetation along the pathways to comprise non-flammable style succulent ground cover or plants (avoid plants that produce fine fuel which is easily ignited, plants that produce a lot of debris, trees and shrubs which retain dead material in branches or which shed long strips of bark, rough fibrous bark or drop large quantities of leaves in the spring and summer, vines on walls or tree canopies which overhang roofs)
- allow clear space from the dwelling of at least 4 times the mature height of any shrubs planted
- total shrub cover to be a maximum of 20% of the available area
- shrubs not to be planted in clumps
- timber woodchip and flammable mulches cannot be used, and brush and timber fencing should be avoided where possible
- woodpiles, garden sheds and other combustible materials should be located downslope and well away from the house

11.3. Maintenance:

- grass to be maintained to a height of a maximum of 100mm
- fuel loads kept to less than 2 tonnes per hectare
- fine fuels to be minimised at ground level (mowing, slashing, raking, etc.)
- remove fuel between the ground and the bottom of the tree canopy or to a height of at least 2 metres (pruning lower branches, shrubs and all scrub) when trees are planted
- ensure the firefighting water supply is available and all hoses, hose reels and connections are in good condition
- guttering on all roofs will require annual removal of debris prior to the onset of each fire season
- the valley and the wall/roof junction will require all debris to be removed prior to the onset of each fire season
- check roof sheet for damage or dislodged roofing materials
- ensure painted surfaces are in good condition with decaying timbers being given particular attention to prevent the lodging of embers within gaps
- check screens on windows and doors are in good condition without breaks or holes in the flyscreen material and frames are well fitting into sills and window frames
- door mats should be of a non-combustible material.

11.4. Vehicular Access:

Access for Lot 1 is existing and is off Bridgenorth Road, and access for Lot 2 is also proposed to be off Bridgenorth Road.

The existing access to **Lot 1** is greater than 30 metres in length, but it is not required to provide access to a fire fighting water point. Whilst the access is currently non-compliant, it is operationally functional and therefore does not need to be upgraded to meet the specifications of *Table C13.2 (B)* of the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivisions.* However, it is recommended that when maintenance is undertaken, it is upgraded where possible to the recommended standards.

The proposed access for **Lot 2**, will utilise the existing adjoining ROW which legal consent to use has been provided and the driveway into the lot from the ROW and turning area to a proposed future dwelling and the static water supply, will need to be designed and constructed to the specifications as per *Table C13.2 (B)* of the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivisions*. The existing ROW which allows reciprocal sharing of the access road provides for a width of 8 metres and therefore meets the requirements of Table C13.2 (D) for access roads providing access to 3 properties or more requiring a passing bay every 100 metres.

The existing ROW allows for reciprocal ROW access over the multiple lots, thereby allowing sufficient width for any vehicles passing and suitable passing bay width along the shared access of some 214+ metres.

11.5. Water Supplies:

Lot 1 is to comply with the requirements of *Table C.13.4. Requirements for Reticulated Water Supply for Firefighting* of the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivisions.*

The fire hydrant system is maintained by TasWater. The fire plug is 11 metres from the driveway entrance of Lot 1. The roadway on Bridgenorth Road can act as the hardstand area for fire appliances to access the fire hydrant. The pedestrian access gate on Bridgenorth Road near the fire plug and the associated pedestrian gate from the front paddock into the dwelling area of Lot 1, both need to be installed prior to the issuing of titles.

Lot 2 is to comply with the requirements of *Table C13.5.* Requirements for *Static Water Supply for Firefighting* of the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivision.*

A firefighting water tank will need to be installed onsite for Lot 2 - the location is yet to be confirmed. The firefighting water supply tanks are required to be installed prior to construction of any dwelling on the lot.

Access to the static water supplies is also required that meets the requirements of *Table C13.2 Standards for property access* of the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivision.*

The static water supply must provide a minimum of 10,000 litre per habitable building to be protected for fire-fighting purposes. The tank water connection point and all pipes and fittings will need to be compliant to the standards outlined in Table C13.5 *Static* Water Supply for Fire fighting of the *Tasmanian Planning Scheme, Bushfire-Prone Areas Code, Development Standards for Subdivision,* with all components being made of non-rusting, non-combustible, non-heat-deforming materials, and be adequately identifiable by a sign.

The water connection point for a static water supply must be identified by a sign permanently fixed to the exterior of the assembly in a visible location. This sign must comply with: Water tank signage requirements within AS 2304-2019 *Water storage tanks for fire protection systems;* or meet the following requirements:

a) *Be* marked with the letter “W” contained within a circle with the letter in upper case of not less than 100 mm in height;
b) Be in fade-resistant material with white reflective lettering and circle on a red background;
c) Be located within one metre of the water connection point in a situation which will not impede access or operation; and
d) Be no less than 400 mm above the ground.

Example of water connection point signage required for firefighting.

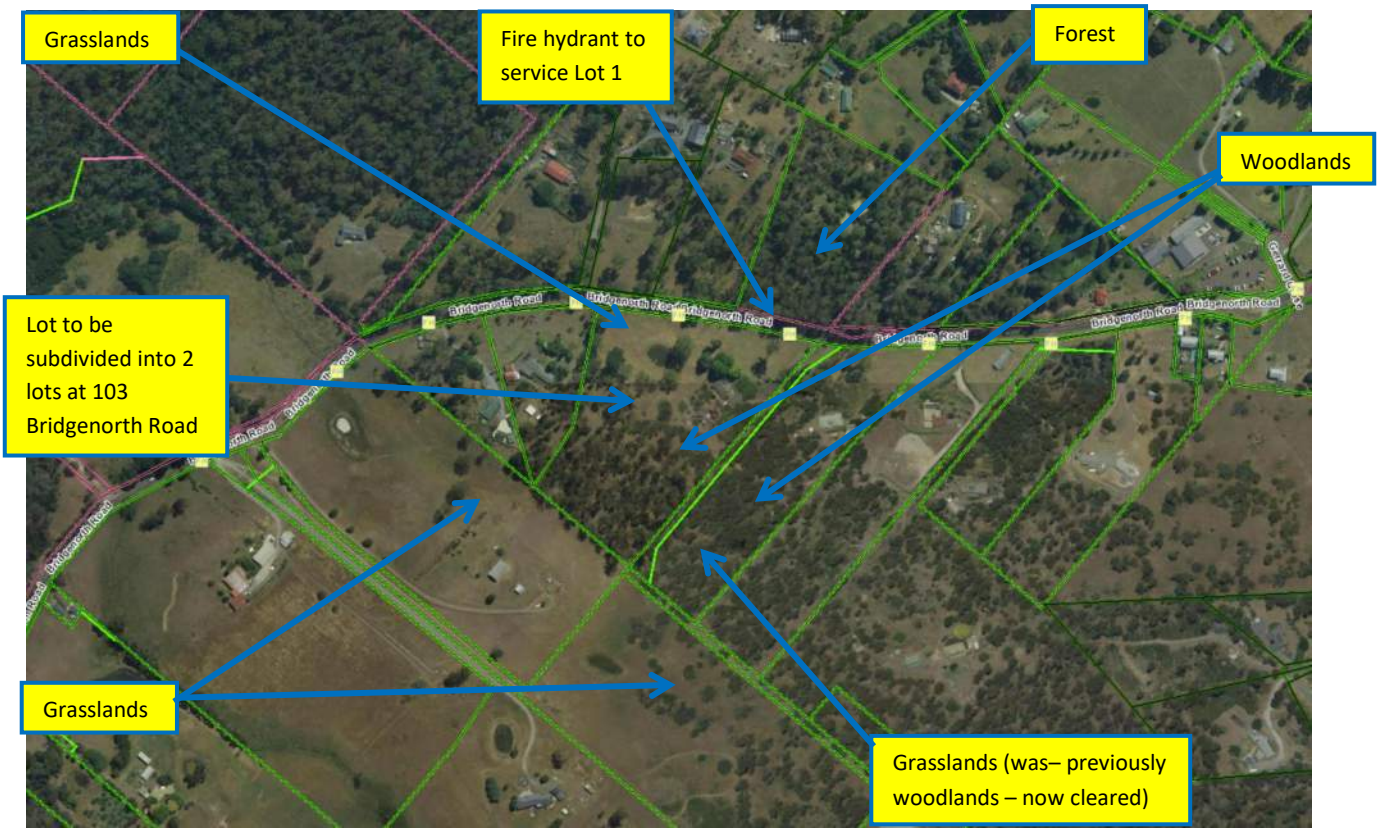
12. Appendix 1: LISTMap

103 Bridgenorth Rd LEGANA TAS 7277

PID: 7351508 (Volume 250009 Folio 1)

Lot 1: Proposed to be 2.32 ha

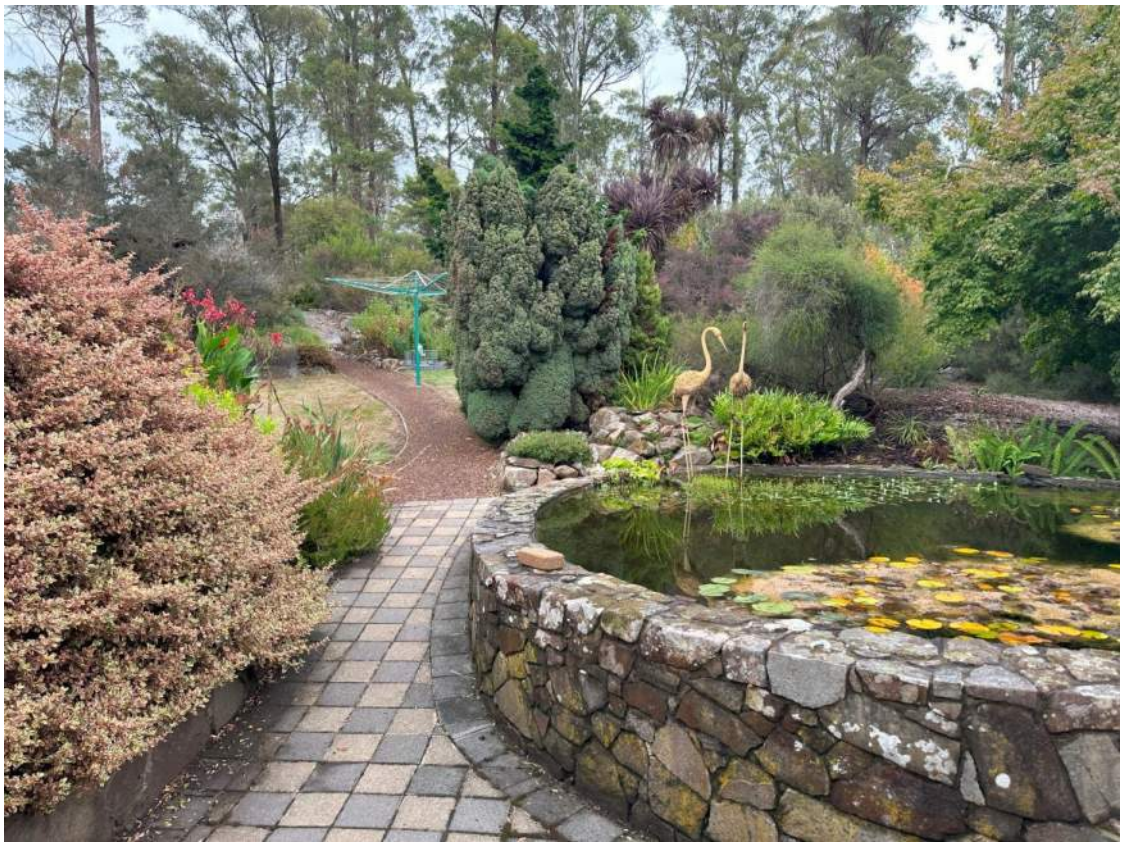
Lot 2: Proposed to be 1.02 ha



13. Appendix 2: Photos of onsite Vegetation

Lot 1:

1 - Views to the North-East



3 - Views to the South-West

5 - Close up of vegetation to the South-West

2 - Views to the South-East

6 - Close up of vegetation to the South-East

4 - Views to the North-West

Lot 2:

7 - View to the North-East

11 - Close up of vegetation to the boundary to the North-East

9 - View to the South-West

12 - Close up of vegetation near the boundary to the South-West

8 - View to the South-East

12 - Close up view of vegetation to the South-East

10 - View to the North-West

13 - Close up of view to the North-West

14. Appendix 3: Form 55

CERTIFICATE OF QUALIFIED PERSON – ASSESSABLE ITEM

Section 321

Form **55**

To: Michael Roy JAMES *Owner /Agent*

103 Bridgenorth Road *Address*

LEGANA TAS 7277 *Suburb/postcode*

Qualified person details:

Qualified person: Leanne Jordan

Address: 20 Richings Drive Phone No: 0417 313 029

YOUNGTOWN TAS 7249 Fax No:

Licence No: BFP -141 Email address: leanne.a.jordan@gmail.com

Qualifications and Insurance details: Accredited to report on bushfire hazards under Part IVA of the Fire Service Act 1979 *(description from Column 3 of the Director's Determination - Certificates by Qualified Persons for Assessable Items*

Speciality area of expertise: Analysis of hazards in bushfire-prone areas *(description from Column 4 of the Director's Determination - Certificates by Qualified Persons for Assessable Items)*

Details of work:

Address: 103 Bridgenorth Road Lot No: 1

LEGANA TAS 7277 Certificate of title No: 250009

The assessable item related to this certificate: Bushfire Hazard Management Plan detailing the Bushfire Attack Level assessment for the proposed subdivision

(description of the assessable item being certified)
Assessable item includes –
- *a material;*
- *a design*
- *a form of construction*
- *a document*
- *testing of a component, building system or plumbing system*
- *an inspection, or assessment, performed*

Certificate details:

Certificate type: Bushfire Hazard Certificate *(description from Column 1 of Schedule 1 of the Director's Determination - Certificates by Qualified Persons for Assessable Items n)*

This certificate is in relation to the above assessable items, at any stage, as part of – *(tick one)*

◉ building work, plumbing work or plumbing installation or demolition work

OR

○ a building, temporary structure or plumbing installation

In issuing this certificate the following matters are relevant –

Documents:	Bushfire Attack Level (BAL) Assessment Report - ALC-BFM 2024/16 v 3 Bushfire Hazard Management Plan (BHMP) – 12 December 2025 Subdivision Plan by D.J. McCulloch & Associates, Job Number 1640-2121.
Relevant calculations:	Calculations are as per AS 3959:2018 - Method 1 BAL assessment
References:	

Substance of Certificate: (what it is that is being certified)

The Bushfire Hazard Management Plan shows the building work for the new subdivision needs to comply with a BAL-19 for Lot 1 & Lot 2. In addition, suitable access and water supply for firefighting needs to be provided for Lot 2.

Scope and/or Limitations

Leanne Jordan has been engaged to identify the bushfire attack level (BAL) for the proposed subdivision in accordance with *AS3959-2018 Construction of Buildings in Bushfire-Prone Areas*, Tasmanian Planning Scheme 2024, Bushfire-Prone Areas Code, Development Standards for Subdivision. The BAL will enable the appropriate construction method and applicable construction requirements for the future proposed building works to be designed in accordance with AS3959-2018 Construction of Buildings in Bushfire- Prone Areas and the Guidelines for Development in Bushfire Prone Areas of Tasmania.

Limitations:

- I have taken all reasonable steps to ensure that the information provided in this assessment is accurate and reflects the conditions on and around the site and allotment on the date of this assessment.
- Impacts of future development and vegetation growth have not been considered.
- The report only identifies the size, volume and status of vegetation at the time the site inspection was undertaken and cannot be relied upon for any future development.
- Only the potential bushfire risk has been dealt with in this report and all other statutory assessments are outside the scope of this certificate.
- No warranty for any buildings constructed on the property is offered or inferred in the event of a bushfire.
- This certificate or report is valid only for the purpose for which it was commissioned.

I certify the matters described in this certificate.

	Signed:	*Certificate No:*	*Date:*
Qualified person:	L Jordan **BFP – 141** Scope: 1, 2, 3A & 3B	**ALC-BFM/2024/16**	12/12/2025

15. Appendix 4: Planning Certificate

BUSHFIRE-PRONE AREAS CODE

CERTIFICATE[1] UNDER S51(2)(d) *LAND USE PLANNING AND APPROVALS ACT 1993*

1. Land to which certificate applies

The subject site includes property that is proposed for use and development and includes all properties upon which works are proposed for bushfire protection purposes.

Street address:	103 Bridgenorth Rd LEGANA 7277
Certificate of Title / PID:	C/T 250009 /1

2. Proposed Use or Development

Description of proposed Use and Development:	2 Lot subdivision
Applicable Planning Scheme:	Tasmanian Planning Scheme 2024

3. Documents relied upon

This certificate relates to the following documents:

Title	Author	Date	Version
Plan of Subdivision, Job Number 1640-2121	D.J. MCCULLOCH & ASSOCIATES	29/10/2025	1
Bushfire Hazard Assessment Report & Bushfire Hazard Management Plan, Report Number - ALC-BFM 2024/16	Leanne Jordan	12/12/2025	3.0

4. Nature of Certificate

[1] This document is the approved form of certification for this purpose and must not be altered from its original form.

The following requirements are applicable to the proposed use and development:

☐	**E1.4 / C13.4 – Use or development exempt from this Code**	
	Compliance test	**Compliance Requirement**
☐	E1.4(a) / C13.4.1(a)	Insufficient increase in risk

☐	**E1.5.1 / C13.5.1 – Vulnerable Uses**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.5.1 P1 / C13.5.1 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.5.1 A2 / C13.5.1 A2	Emergency management strategy
☐	E1.5.1 A3 / C13.5.1 A2	Bushfire hazard management plan

☐	**E1.5.2 / C13.5.2 – Hazardous Uses**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.5.2 P1 / C13.5.2 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.5.2 A2 / C13.5.2 A2	Emergency management strategy
☐	E1.5.2 A3 / C13.5.2 A3	Bushfire hazard management plan

☐	**E1.6.1 / C13.6.1 Subdivision: Provision of hazard management areas**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.1 P1 / C13.6.1 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.6.1 A1 (a) / C13.6.1 A1(a)	Insufficient increase in risk
☒	E1.6.1 A1 (b) / C13.6.1 A1(b)	Provides BAL-19 for all lots (including any lot designated as 'balance')
☐	E1.6.1 A1(c) / C13.6.1 A1(c)	Consent for Part 5 Agreement

☐	**E1.6.2 / C13.6.2 Subdivision: Public and fire fighting access**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.2 P1 / C13.6.2 P1	***Planning authority discretion required. A proposal cannot be certified as compliant with P1.***
☐	E1.6.2 A1 (a) / C13.6.2 A1 (a)	Insufficient increase in risk
☒	E1.6.2 A1 (b) / C13.6.2 A1 (b)	Access complies with relevant Tables

☐	**E1.6.3 / C13.1.6.3 Subdivision: Provision of water supply for fire fighting purposes**	
	Acceptable Solution	**Compliance Requirement**
☐	E1.6.3 A1 (a) / C13.6.3 A1 (a)	Insufficient increase in risk
☒	E1.6.3 A1 (b) / C13.6.3 A1 (b)	Reticulated water supply complies with relevant Table ***(Lot 1)***
☐	E1.6.3 A1 (c) / C13.6.3 A1 (c)	Water supply consistent with the objective
☐	E1.6.3 A2 (a) / C13.6.3 A2 (a)	Insufficient increase in risk
☒	E1.6.3 A2 (b) / C13.6.3 A2 (b)	Static water supply complies with relevant Table ***(Lot 2)***
☐	E1.6.3 A2 (c) / C13.6.3 A2 (c)	Static water supply consistent with the objective

5. Bushfire Hazard Practitioner

Name:	Leanne Jordan	**Phone No:**	0417 313 029
Postal Address:	20 Richings Drive YOUNGTOWN	**Email Address:**	leanne.a.jordan@gmail.com
Accreditation No:	BFP – 141	**Scope:**	1, 2 3A & 3B

6. Certification

I certify that in accordance with the authority given under Part 4A of the *Fire Service Act 1979* that the proposed use and development:

☐ Is exempt from the requirement Bushfire-Prone Areas Code because, having regard to the objective of all applicable standards in the Code, there is considered to be an insufficient increase in risk to the use or development from bushfire to warrant any specific bushfire protection measures, or

☒ The Bushfire Hazard Management Plan/s identified in Section 3 of this certificate is/are in accordance with the Chief Officer's requirements and compliant with the relevant **Acceptable Solutions** identified in Section 4 of this Certificate.

Signed:
certifier

Name: Leanne Jordan **Date:** 12/12/2025

Certificate Number: **ALC-BPAC/2024/16**

(for Practitioner Use only)

Vegetation Assessment

Autumn Leaves Consulting

20 Richings Drive
YOUNGTOWN
TAS 7249

0417 313 029
leanne.a.jordan@gmail.com
ABN 46 286 311 768

WOODLANDS

FOREST

GRASSLANDS

GRASSLANDS

GRASSLANDS

GRASSLANDS

NW
FLAT

NE
DOWNSLOPE
5°-10° SLOPE

NE
DOWNSLOPE
5°-10° SLOPE

EXISTING
DWELLING

Lot 1

MANAGED

NW
DOWNSLOPE
5°-10° SLOPE

NE
DOWNSLOPE
0°-5° SLOPE

UPSLOPE
SW

NE
UPSLOPE
S/E

WOODLANDS

WOODLANDS

GRASSLANDS

MANAGED

Lot 2

DOWNSLOPE
0°-5° SLOPE
S/W

UPSLOPE
S/E

WOODLANDS

GRASSLANDS

north

Site Plan

25m 50m 75m

Scale: 1 : 1250

103 Bridgenorth Road, Legana

C/T 250009/1 PID 7351508

Proposed subdivision,
Design Plan, D. J. McCulloch & Associates - Job Number 1640-2121
Lot 1 & 2 BAL-19 (see Bushfire Report, Autumn Leaves Consulting ALC-BFM 2024/16)
Date: 12 December 2025
Leanne Jordan BFP-141 Scope 1, 2, 3A & 3B

Bushfire Hazard Management Plan

Autumn Leaves Consulting

20 Richings Drive
YOUNGTOWN
TAS 7249

0417 313 029
leanne.a.jordan@gmail.com
ABN 46 286 311 768

BRIDGENORTH ROAD

FOREST
UPSLOPE

GRASSLANDS

PEDESTRIAN GATES - TO BE INSTALLED PRIOR TO TITLES BEING ISSUED.

FP

NW
FLAT

GRASSLANDS

N/E
DOWNSLOPE
5°-10° SLOPE

WATER SUPPLY LOT 2 - AS PER TASMANIAN PLANNING SCHEME, C13.6.3 PROVISION OF STATIC WATER SUPPLY FOR FIRE FIGHTING PURPOSES, TABLE C13.5. LOCATION TO BE DETERMINED.

GRASSLANDS

Lot 1
BAL-19

N/E
DOWNSLOPE
5°-10° SLOPE

WATER SUPPLY LOT 1- AS PER TASMANIAN PLANNING SCHEME, C13.6.3 PROVISION OF WATER SUPPLY FOR FIRE FIGHTING PURPOSES, TABLE C13.5.

THE WATER SUPPLY IS 97 METRES AS A HOSE LAY, TO THE FURTHEST POINT OF THE EXISTING DWELLING.

DRIVEWAY, LOT 1 - OPERATIONALLY FUNCTIONAL - NO UPGRADE REQUIRED

DRIVEWAY, LOT 2 - AS PER TASMANIAN PLANNING SCHEME, C13.6.2: PUBLIC AND FIRE FIGHTING ACCESS, TABLE C13.2(B) & (D). THE EXISTING RECIPROCAL R.O.W. PROVIDES ACCESS FOR LOT 2. THE WIDTH OF THE R.O.W. MEETS VEHICLE PASSING REQUIREMENTS.

WOODLANDS

N/W
DOWNSLOPE
5°-10° SLOPE

N/E
DOWNSLOPE
0°-5° SLOPE

WOODLANDS

UPSLOPE
S/W

UPSLOPE
S/E

WOODLANDS

Lot 2
BAL-19

WT

WOODLANDS

DOWNSLOPE
0°-5° SLOPE
S/W

UPSLOPE
S/E

GRASSLANDS

GRASSLANDS THEN WOODLANDS

HABITABLE BUILDING AREA

HAZARD MANAGEMENT AREA (HMA)

north

Site Plan

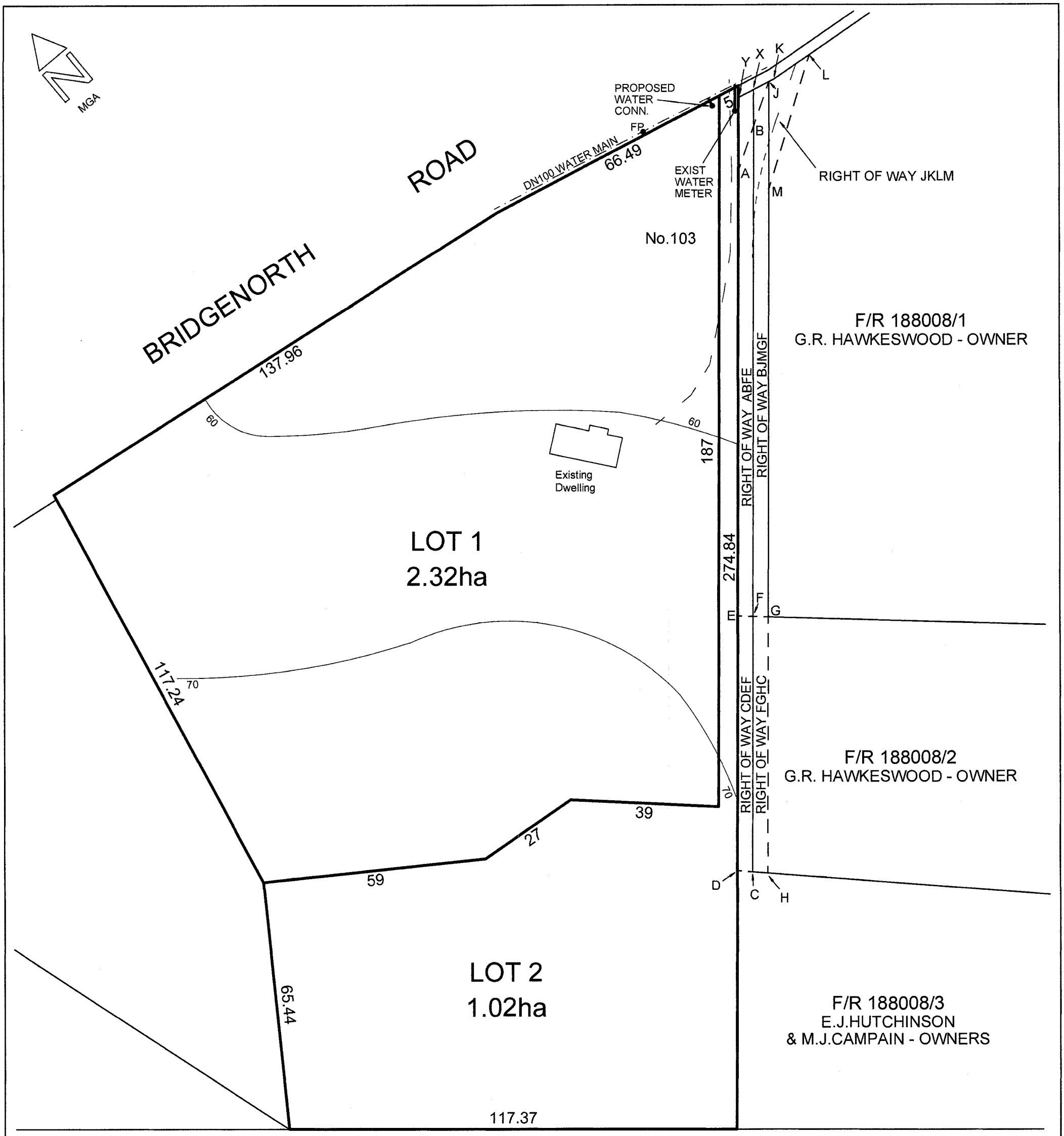
25m 50m 75m

Scale: 1 : 1000

103 Bridgenorth Road, Legana

C/T 250009/1 PID 7351508

Proposed subdivision,
Design Plan, D. J. McCulloch & Associates - Job Number 1640-2121
Lot 1 & 2 BAL-19 (see Bushfire Report, Autumn Leaves Consulting ALC-BFM 2024/16)
Date: 12 December 2025
Leanne Jordan BFP-141 Scope 1, 2, 3A & 3B



LOT 1 & LOT 2 COMPRISE THE WHOLE OF F/R 250009/1 MICHAEL JAMES - OWNER
ALL DIMENSIONS AND AREAS ARE SUBJECT TO FINAL TITLE SURVEY
LOT 2 WILL HAVE LEGAL RIGHT OF WAY OVER THE EXISTING PRIVATE DRIVEWAY WITHIN IN THE EXISTING ADJOINING RIGHTS OF WAY CREATED BY SP188008
LOT 2 WILL HAVE A SERVICES EASEMENT OVER THAT PART OF F/R 188008/3 LABELLED CDYX

TASWATER NOTES
(1) SUPPLY & INSTALL DN20mm (ID206) HDPE PN16 SDR11 PROPERTY WATER CONNECTION WITH COMPATIBLE WATER METER BELOW GROUND LOW HAZARD BY TASWATER AT DEVELOPERS COST. WATER METER & CONNECTION TO BE LOCATED IN ACCORDANCE WITH TASWATER'S TSA03-MRWA v2.0 SUPPLEMENT

ALL WATER CONNECTIONS ARE TO BE CONSTRUCTED BY TASWATER AT THE DEVELOPERS COST
ALL WORKS ARE TO BE IN ACCORDANCE WITH THE WATER SUPPLY CODE OF AUSTRALIA WSA 03-2011-3.1 VERSION 3.1 MRWA EDITION V2.0 & THE SEWERAGE CODE OF AUSTRALIA MRWA CODE WSA 02-2014-3.1 MRWA VERSION 2 AND TASWATER'S SUPPLEMENTS TO THOSE CODES

D.J.McCulloch & Associates
PO BOX 725
RIVERSIDE
TAS 7250
MOBILE 0417526589
EMAIL:- mcculldj@bigpond.net.au

SUBDIVISION & SERVICES PLAN

103 Bridgenorth Road, Legana
Michael Roy James - Owner
Title Reference - F/R 250009/1
Development Application for Planning Permit
West Tamar Council

SCALE 1:1000 (A3)	D. McCulloch 29/10/2025	PLAN 5625-01 DA
JOB No. 1640-2121		

NATURAL VALUES ASSESSMENT OF 103 BRIDGENORTH ROAD (PID 7351508; C.T. 250009/1; LPI HYN61), LEGANA, TASMANIA

Environmental Consulting Options Tasmania (ECO*tas*) for Michael James

7 December 2025

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CITATION

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AUTHORSHIP

Field assessment: Mark Wapstra

Report production: Mark Wapstra

Habitat and vegetation mapping: Mark Wapstra

Base data for mapping: LISTmap

Digital and aerial photography: Mark Wapstra, Google Earth, LISTmap, ESRI World Imagery

ACKNOWLEDGEMENTS

Michael James (owner) and Dallas McCulloch (D.J.McCulloch & Associates) provided information on the proposed land use.

QUALIFICATIONS

Except where otherwise stated, the opinions and interpretations of legislation and policy expressed in this report are made by the author and do not necessarily reflect those of the relevant agency. The client should confirm management prescriptions with the relevant agency before acting on the content of this report. This report and associated documents do not constitute legal advice.

Note that any reference to the Department of Primary Industries, Parks, Water & Environment (DPIPWE) now refers to the Department of Natural Resources and Environment Tasmania.

COVER ILLUSTRATION

View of the better condition grassy black peppermint forest in the middle of the title.

Please note: the blank pages in this document are deliberate to facilitate double-sided printing.

CONTENTS

SUMMARY

General

Michael James (owner) engaged Environmental Consulting Options Tasmania (ECO*tas*) to undertake a natural values assessment of 103 Bridgenorth Road (PID 7351508; C.T. 250009/1; LPI HYN61), Legana, Tasmania, primarily to ensure that the requirements of the identified natural values are appropriately considered during any further project planning under local, State and Commonwealth government approval protocols.

Site assessment

A natural values assessment of the study area was undertaken by Mark Wapstra (ECO*tas*) on 16 Dec. 2024.

Summary of key findings

Threatened flora

- No plant species listed as threatened on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) are known from database information, or were detected as consequence of site assessment, from the study area.
- Two plant species listed as threatened on the Tasmanian *Threatened Species Protection Act 1995* (TSPA) were detected as consequence of site assessment from the study area, as follows:
  - *Brunonia australis* (blue pincushion): locally abundant in less disturbed part of title; and
  - *Caesia calliantha* (blue grasslily): localised to scattered plants in less disturbed part of title.
- The presence of populations of threatened flora means that parts of the site are "a threatened flora species" [sic] such that these areas can be reasonably construed as "priority vegetation" (in relation to this value) pursuant to C7.3.1(b) of the *State Planning Provisions*.

Threatened fauna

- No fauna species listed as threatened on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) and/or the Tasmanian *Threatened Species Protection Act 1995* (TSPA) are known from database information, or were detected as a consequence of site assessment, from the study area.
- The study area supports potential habitat (to varying degrees) for the following species:
  - *Sarcophilus harrisii* (Tasmanian devil);
  - *Dasyurus maculatus* subsp. *maculatus* (spotted-tailed quoll);
  - *Dasyurus viverrinus* (eastern quoll);

  - *Perameles gunnii* subsp. *gunnii* (eastern barred bandicoot);
  - *Aquila audax* subsp. *fleayi* (Tasmanian wedge-tailed eagle);
  - *Haliaeetus* [syn. *Ichthyophaga*] *leucogaster* (white-bellied sea-eagle);
  - *Accipiter* [syn. *Tachyspiza*] *novaehollandiae* (grey goshawk);
  - *Myiagra cyanoleuca i(*satin flycatcher);
  - *Neophema chrysostoma* (blue-winged parrot); and
  - *Tyto novaehollandiae* subsp. *castanops* (Tasmanian masked owl).
- The absence of "significant habitat for a threatened fauna species", at any reasonable scale or interpretation of the concept, means that the site cannot be "priority vegetation" (in relation to this value) pursuant to C7.3.1(c) of the *State Planning Provisions*.

Vegetation types

- The study area supports the following TASVEG mapping units:
  - *Eucalyptus amygdalina* forest and woodland on dolerite (TASVEG code: DAD);
  - agricultural land (TASVEG code: FAG – now coded as FAL): and
  - urban areas (TASVEG code: FUR).
- Occurrences of DAD do not equate to a native vegetation community listed as threatened on Schedule 3A of the Tasmanian *Nature Conservation Act 2002*.
- Occurrences of DAD do not equate to a threatened ecological community listed under the Commonwealth *Environment Protection and Biodiversity Protection Act 1999*.
- The absence of "native vegetation [that] forms an integral part of a threatened native vegetation community as prescribed under Schedule 3A of the *Nature Conservation Act 2002*" means that the site cannot be "priority vegetation" (in relation to this value) pursuant to C7.3.1(a) of the *State Planning Provisions*.

Weeds

- No plant species classified as declared weeds within the meaning of the Tasmanian *Biosecurity Act 2019* (*Biosecurity Regulations 2022*) were detected from the study area.

Plant disease

- No evidence of *Phytophthora cinnamomi* (PC, rootrot) was recorded within the study area.
- No evidence of myrtle wilt was recorded from within the study area.
- No evidence of myrtle rust was recorded from within the study area.

Animal disease (chytrid)

- The study area does support habitats conducive to frog chytrid disease but these will be wholly retained within the balance lot.

Recommendations

The recommendations provided below are a summary of those provided in relation to each of the natural values described in the main report. The main text of the report provides the relevant context for the recommendations.

Vegetation types

In general terms, minimising the extent of "clearance and conversion" and/or "disturbance" to native vegetation is recommended, recognising the relatively small size of the proposed lots, configuration and particular constraints (such as access, service and setback requirements) and future bushfire hazard management requirements.

Threatened flora

The proposed development site supports two plant species, namely *Brunonia australis* (blue pincushion) and *Caesia calliantha* (blue grasslily), listed as threatened (rare) on the Tasmanian *Threatened Species Protection Act 1995* (TSPA). Subdivision has taken account of the distribution of these species, and it should be practical to avoid all mapped occurrences with infrastructure such as boundary fencing and eventual house sites including bushfire hazard management zones.

Threatened fauna

Apart from the generic recommendation to minimise the extent of "clearance and conversion" and/or "disturbance" to native vegetation, specific management in relation to threatened fauna is not recommended.

Weed and disease management

Owner-occupation is considered the most appropriate longer-term management option, where vigilance and immediate control are practical, with reference to the *General Biosecurity Duty* under the Tasmanian *Biosecurity Act 2019* (https://nre.tas.gov.au/biosecurity-tasmania/general-biosecurity-duty-(gbd).

In this case, provided that the above recommendations are adhered to, a stand-alone weed management plan should not be required.

Legislative and policy implications

There will be a formal requirement for a permit under Section 51 of the Tasmanian *Threatened Species Protection Act 1995* (TSPA) to "take" individuals of *Brunonia australis* (blue pincushion) and *Caesia calliantha* (blue grasslily) if occurrences cannot be excluded (the present site plan achieves this). Refer to text on the complexities of the interplay between this Act and the planning approval process.

A formal referral to the relevant agency under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) is not considered required.

Development will require a planning permit pursuant to the provisions of the applicable planning scheme. Satisfaction of P1.1 & P1.2 of C7.7.2 of the Natural Assets Code of the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule* appears possible without complex permit conditions.

INTRODUCTION

Purpose

Michael James (owner) engaged Environmental Consulting Options Tasmania (ECO*tas*) to undertake a natural values assessment of 103 Bridgenorth Road (PID 7351508; C.T. 250009/1; LPI HYN61), Legana, Tasmania (Figures 1-3), primarily to ensure that the requirements of the identified natural values are appropriately considered during any further project planning under local, State and Commonwealth government approval protocols.

Scope

This report relates to:

- flora and fauna species of conservation significance, including a discussion of listed threatened species (under the Tasmanian *Threatened Species Protection Act 1995* and/or the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*) potentially present, and other species of conservation significance/interest;
- vegetation types (forest and non-forest, native and exotic) present, including a discussion of the distribution, condition, extent, composition and conservation significance of each community;
- plant and animal disease management issues;
- weed management issues; and
- a discussion of some of the policy and legislative implications of the identified natural values.

This report follows the government-produced *Guidelines for Natural Values Surveys – Terrestrial Development Proposals* (DPIPWE 2015) in anticipation that the report (or extracts of it) may be required as part of various approval processes.

The report format should also be applicable to other assessment protocols as required by the relevant Commonwealth agency (for any referral/approval that may be required under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*), which is unlikely to be required in this case.

More specifically, this assessment and report have been prepared to address specific provisions of the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule*, with particular reference to the provisions within the Natural Assets Code, as requested by the West Tamar Council in correspondence dated 1 Nov. 2024, as follows:

4. Please provide a response to C7.7.2 P1.1 and P1.2 of the Natural Assets Code in relation to the proposed building envelopes, bushfire hazard management areas and onsite wastewater disposal areas.

Limitations

The natural values assessment was undertaken on 16 Dec. 2024. Many plant species have ephemeral or seasonal growth or flowering habits, or patchy distributions (at varying scales), and it is possible that some species were not recorded for this reason. However, every effort was made to sample the range of habitats present in the survey area to maximise the opportunity of recording most species present (particularly those of conservation significance). Late spring and into summer

is usually regarded as the most suitable period to undertake most botanical assessments. While some species have more restricted flowering periods, a discussion of the potential for the site to support these is presented. In this case, the survey was appropriately (and deliberately) timed to detect the species with a highest priority for conservation management in this part of the State.

The survey was also limited to vascular species: species of mosses, lichens and liverworts were not recorded. However, a consideration is made of threatened species (vascular and non-vascular) likely to be present (based on habitat information and database records) and reasons presented for their apparent absence.

Surveys for threatened fauna were largely limited to an examination of "potential habitat" (i.e. comparison of on-site habitat features to habitat descriptions for threatened fauna), and detection of tracks, scats and other signs.

Permit

Any plant material was collected under DNRET permit TFL 24238 (in the name of Mark Wapstra). Relevant data will be entered into DNRET's *Natural Values Atlas* database by the author (point locations of threatened flora). Some plant material may be lodged at the Tasmanian Herbarium by the author.

No vertebrate or invertebrate material was collected. A permit is not required to undertake the type of habitat-level assessment described herein.

LAND USE PROPOSAL

The land use proposal is for a 3-lot (2 new, 1 balance) subdivision as indicated at Figure 4.

STUDY AREA

Overview – cadastral details

The study area comprises the title of 103 Bridgenorth Road, Legana (Figures 1-3), with the following cadastral details:

- PID: 7351508;
- C.T.: 250009/1; and
- LPI: HYN61.

LISTmap data indicates a computed area of 33,392.853 m^2 and a measured area of 33,440 m^2 (i.e. ca. 3.34 ha).

Current land tenure and other categorisations of the study area are as follows:

- private freehold;
- West Tamar municipality, zoned as Low Density Residential pursuant to the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule* (Figure 5), wholly subject to the Bushfire-prone Areas overlay and partially subject to the Priority Vegetation Area overlay (Figure 6); and
- Northern Midlands bioregion, according to the IBRA 7 bioregions used by most government agencies.

The title is wholly fenced along its boundaries and internally, bound to the north by Bridgenorth Road, to the west and southeast by residentially-occupied titles (albeit with some remnant native vegetation) and to the southwest by an occupied rural living-style title.

Other site features

Topographically, the title comprises generally northeast-facing relatively gentle slopes at ca. 50-70 m a.s.l., with a gentle "ridgeline" running approximately southeast-northwest in the lower southern third of the title, south of which is a broad flat at ca. 75 m a.s.l.

The title is currently residentially-occupied with a well-formed drive off Bridgenorth Road, a dwelling and associated residential elements, as well as an extensive area of long-cleared land grazed by native and captive marsupials, rabbits and emus that includes a moderately large constructed pond (Plates 1 & 2). The captive animals are fenced in about the northern half of the title, some of which comprises modified native forest (Plates 3 & 4).


Plates 1 & 2. Mown (grazed) gentle slopes and constructed pond and residential dwelling


Plates 3 & 4. Modified native vegetation in northern part of title

The middle of the title has a band of less modified native forest, fenced to the north but unfenced to the south. This area has probably remained largely unmodified (apart from minor fuel reduction burning and timber getting) due to the exposed rock (Plates 5 & 6).

Plate 5. (LHS) Modified forest to north (left part of image) with less modified forest to south (right of image)

Plate 6. Less modified forest in middle of title – note the exposed rock

The southern part of the title is also modified native forest, now effectively remnant canopy trees and tall shrubs over frequently mown/grazed grass (Plates 7 & 8).

Plates 7 & 8. Views of modified southern part of title

The geology of the title is mapped (Figure 7) mainly as Jurassic-age "dolerite (tholeiitic) with locally developed granophyre" (geocode: Jd), which was informally confirmed by site assessment with extensive dolerite outcropping in the middle and northern part of the title (Plates 9 & 10). The far southwest of the title is mapped as Quaternary-age "dominantly non-marine sequences of gravel, sand, silt, clay and regolith" (geocode: Ts), this latter area seemingly most strongly influenced by the adjacent dolerite geology. The geology is mentioned because of its strong influence on

vegetation classification, association with threatened flora, and to a lesser extent, threatened fauna.


Plates 9 & 10. Examples of outcropping dolerite in title

LISTmap's Fire History layer indicates no recorded fire events. However, site assessment indicated that there have been previous fires creating at least some basal scars in marginally larger trees (Plate 11) and some more recent low intensity fuel reduction burning resulting in scorched bark (Plate 12). The fire history has an influence on the structure and composition of the vegetation, and also influences the potential for threatened flora. Structurally, the remnant forest areas are mapped as having low mature habitat availability (Figure 8), which is also reflected in the tree canopy layer modelling that shows a relatively homogeneous canopy structure, except for a few larger trees on the frontage with Bridgenorth Road (Figure 9).


Plate 11. (LHS) Tree with small basal fire scar indicative of a fire event some time ago

Plate 12. (RHS) Minor scorch bark indicative of a lower intensity and more recent fire event

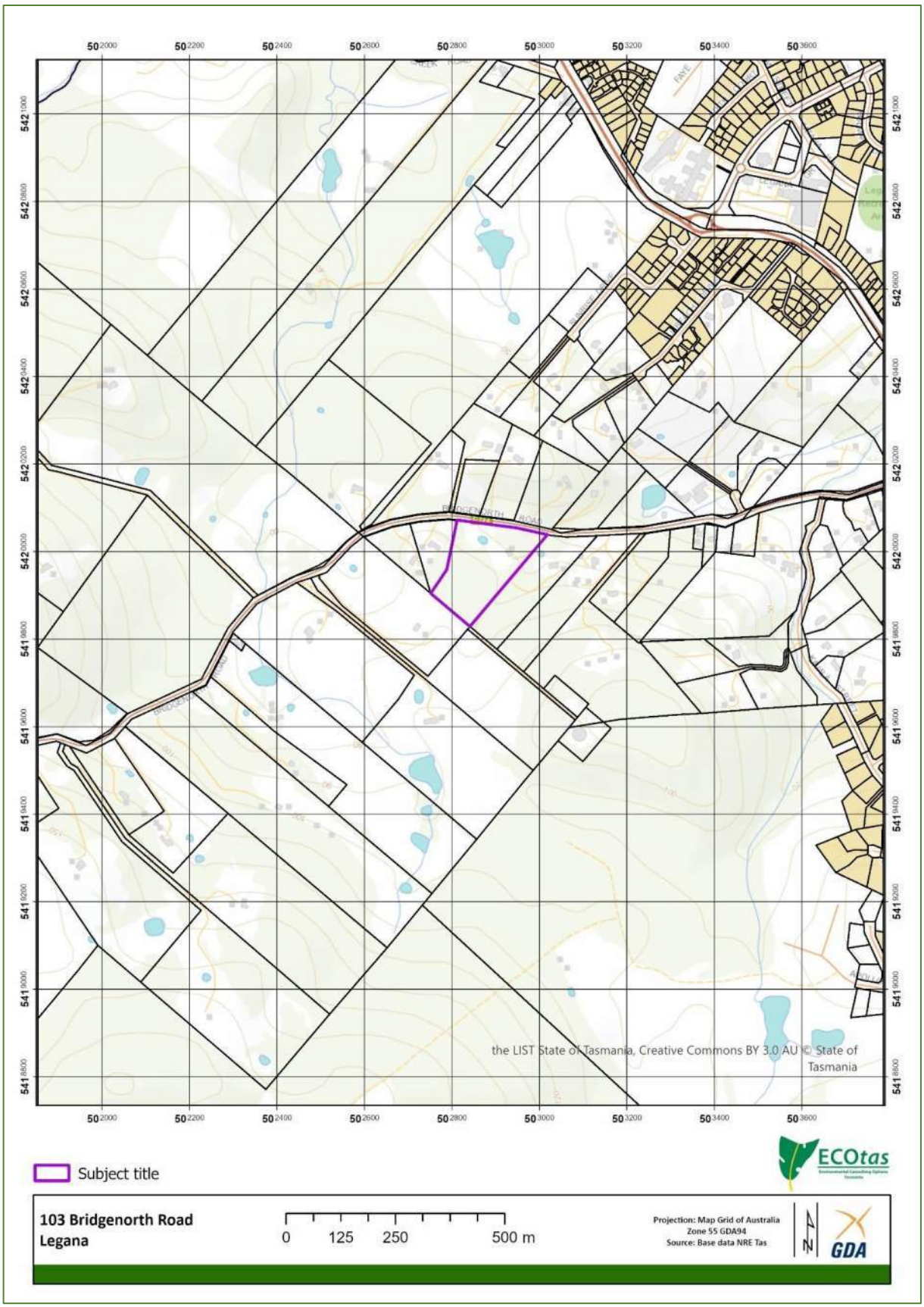

Figure 1. General location of study area

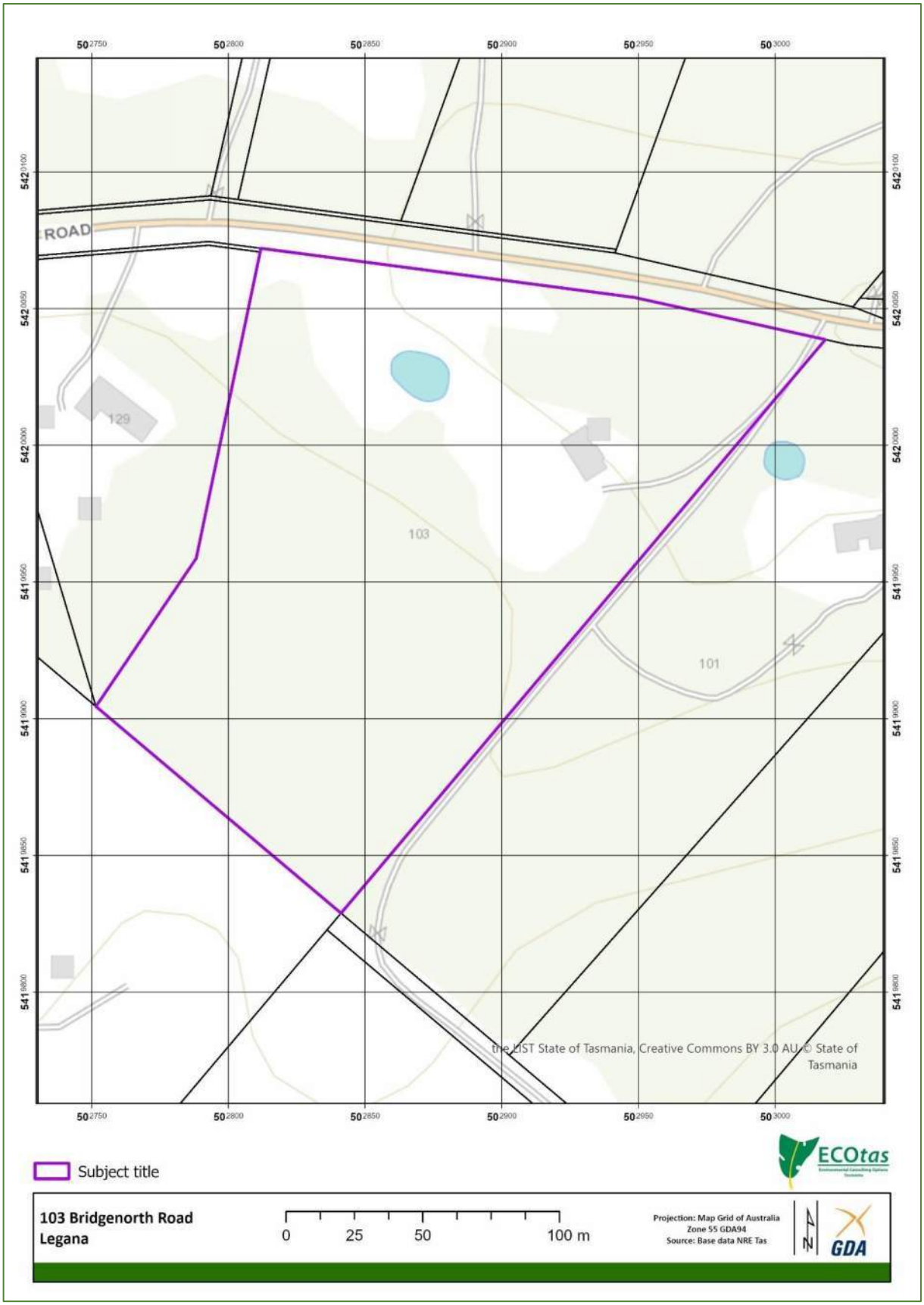

Figure 2. Detailed location of study area showing general topographic and cadastral features

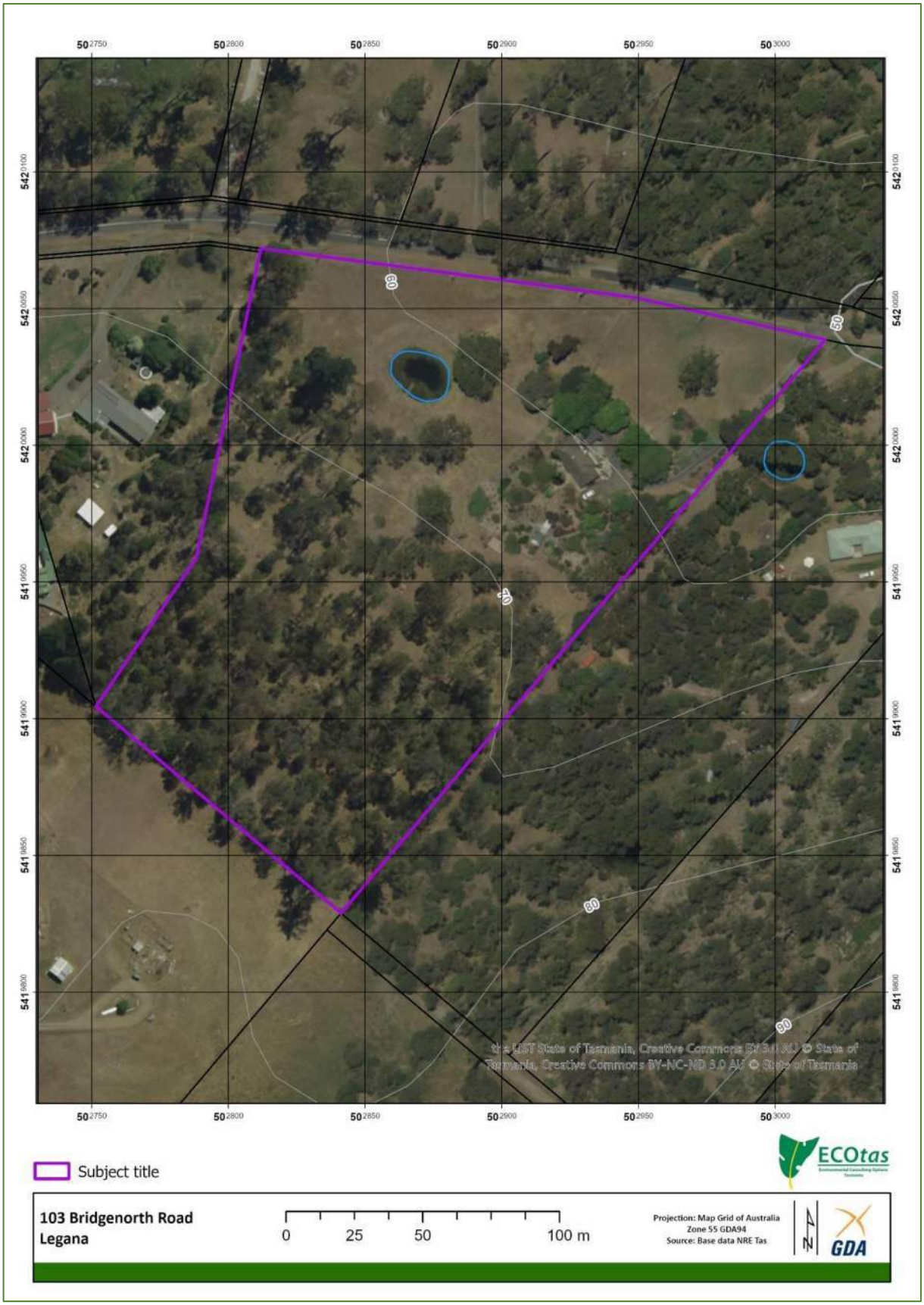

Figure 3. Detailed location of study area showing recent aerial imagery and cadastral boundaries

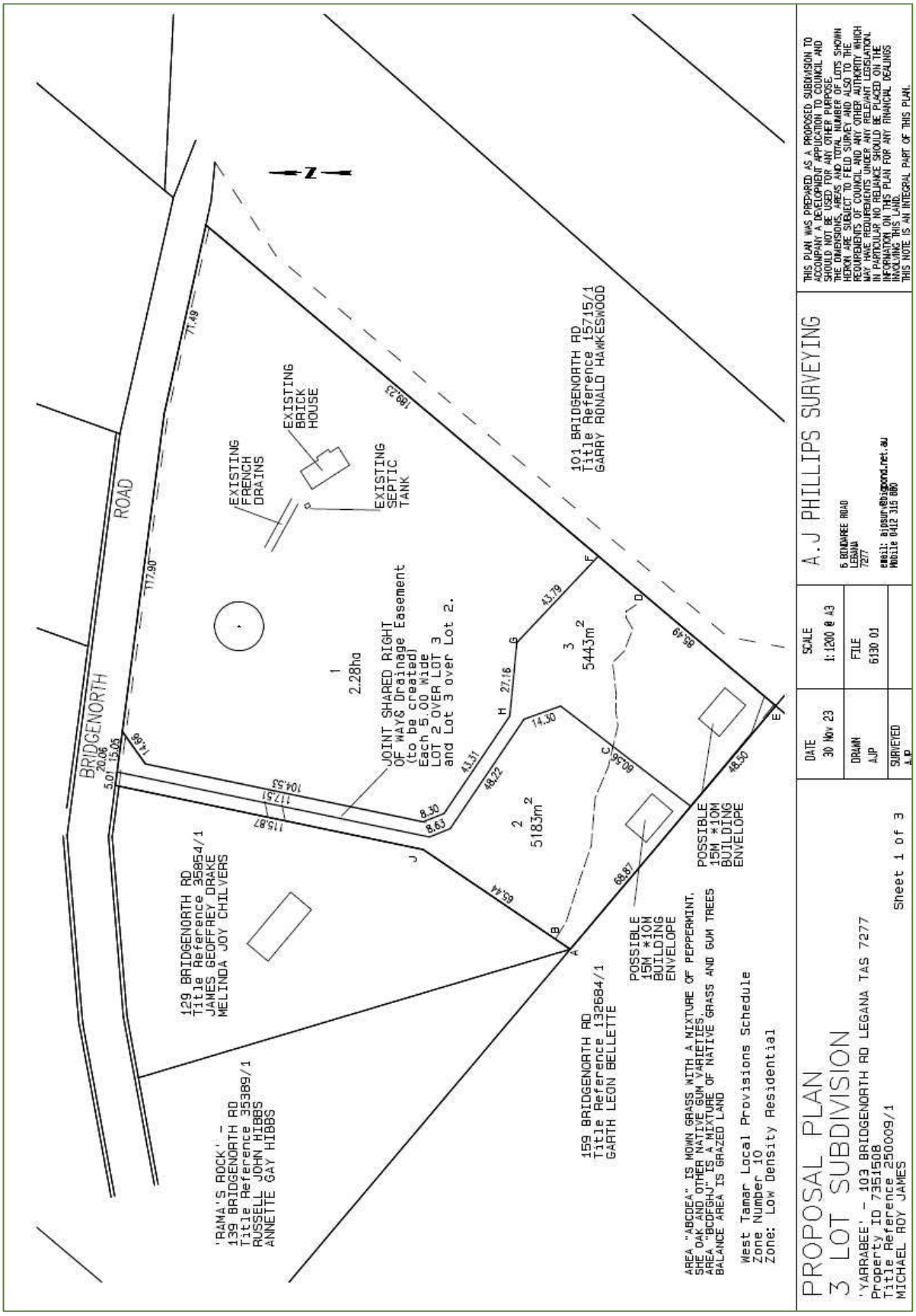

Figure 4. Indicative subdivision design (included for context only)

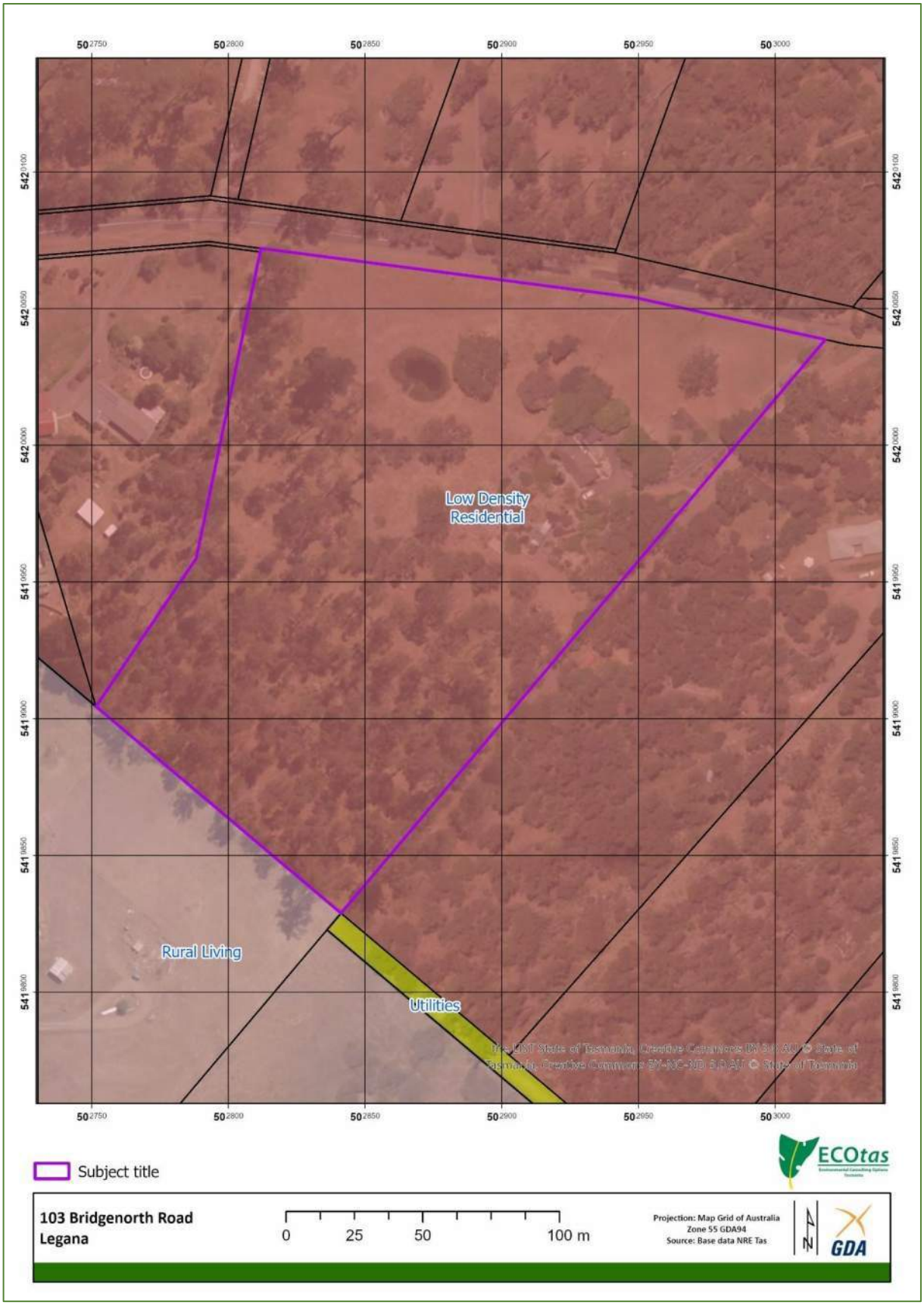

Figure 5. Zoning of study area and surrounds pursuant to the *Tasmanian Planning Scheme – West Tamar*

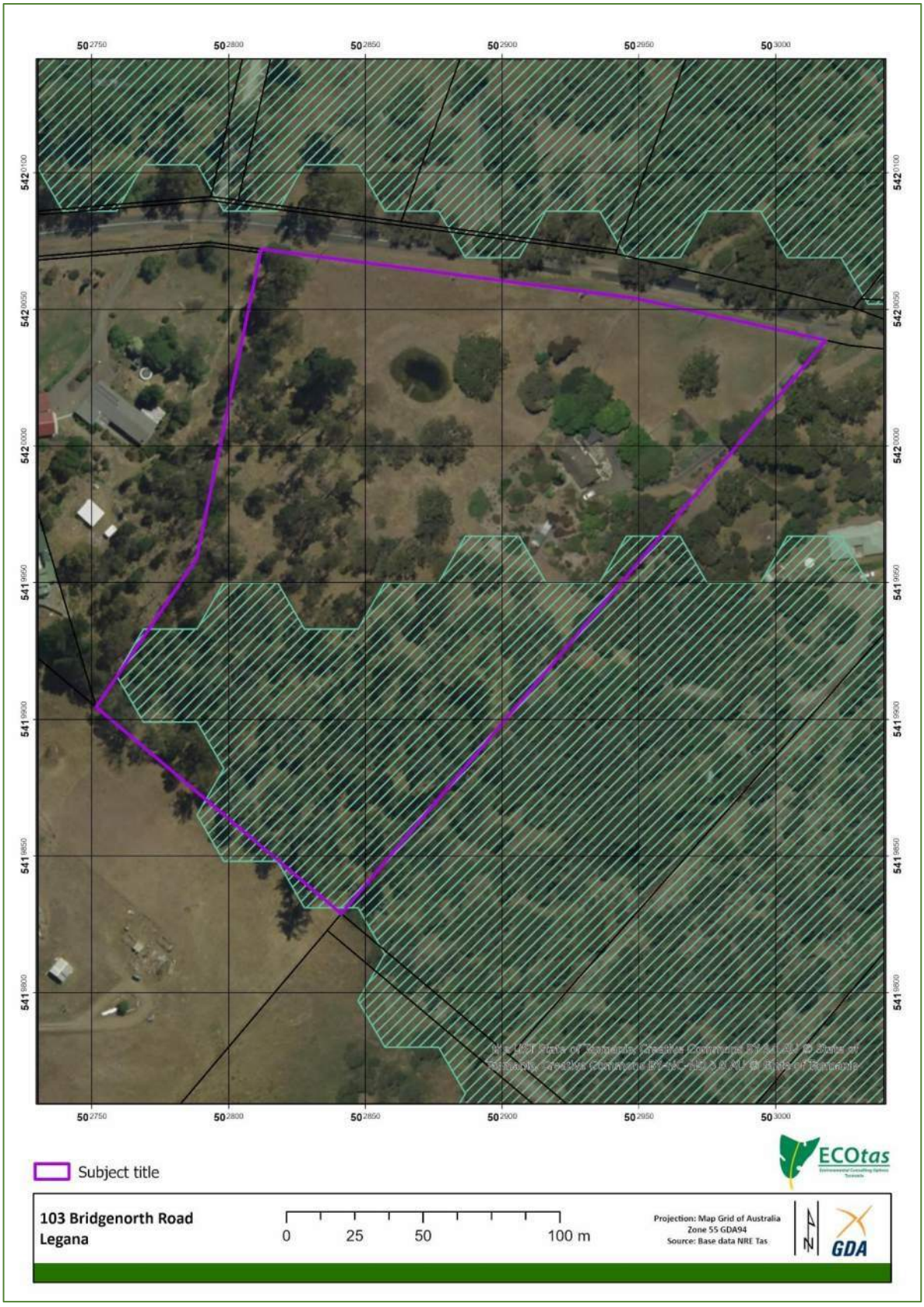

Figure 6. Extent of Priority Vegetation Area overlay within and adjacent to study area pursuant to the *Tasmanian Planning Scheme – West Tamar*

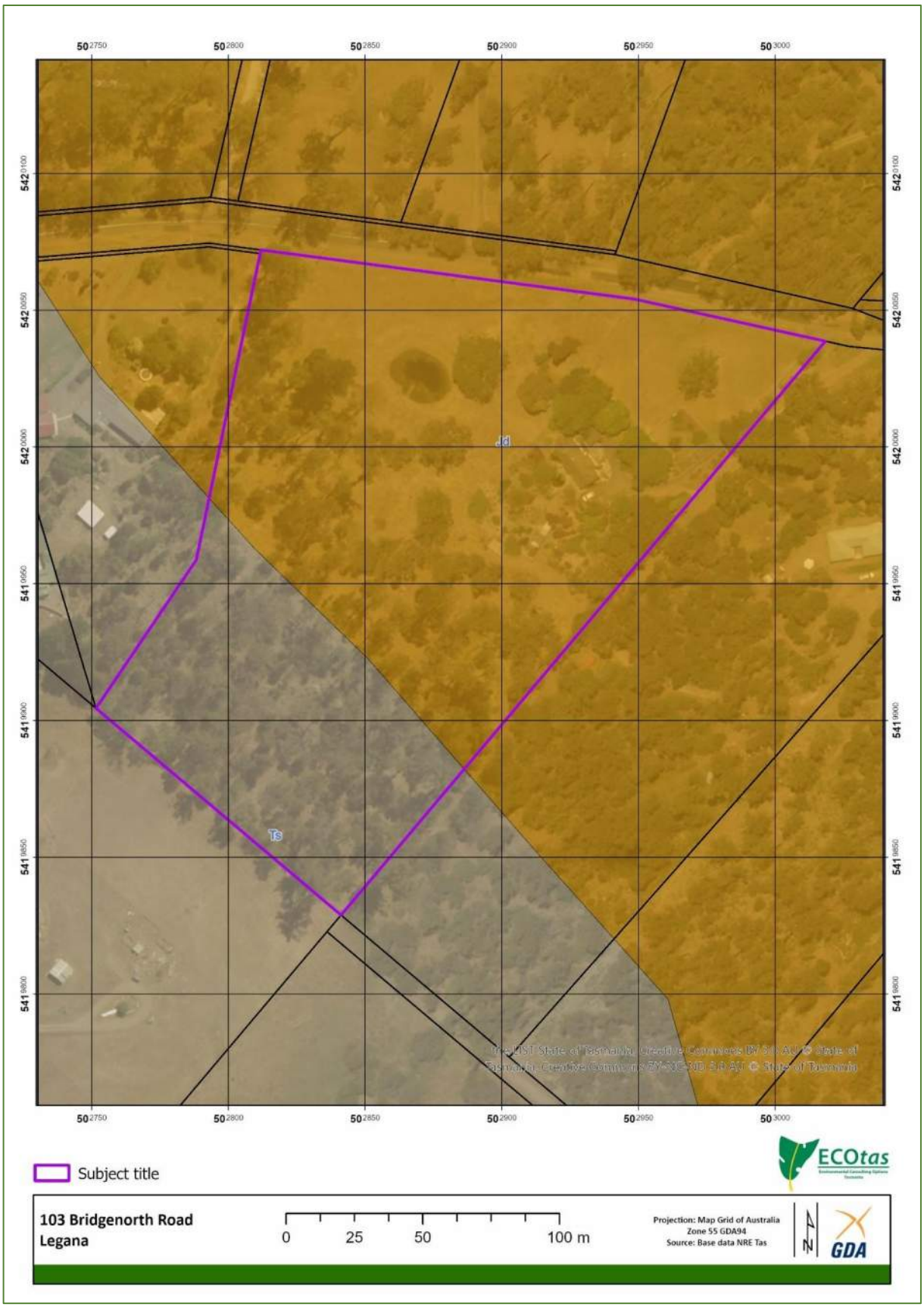

Figure 7. Geology (1:250,000 scale) of study area and surrounds (refer to text for codes)

Figure 8. Mature habitat mapping for study area and surrounds

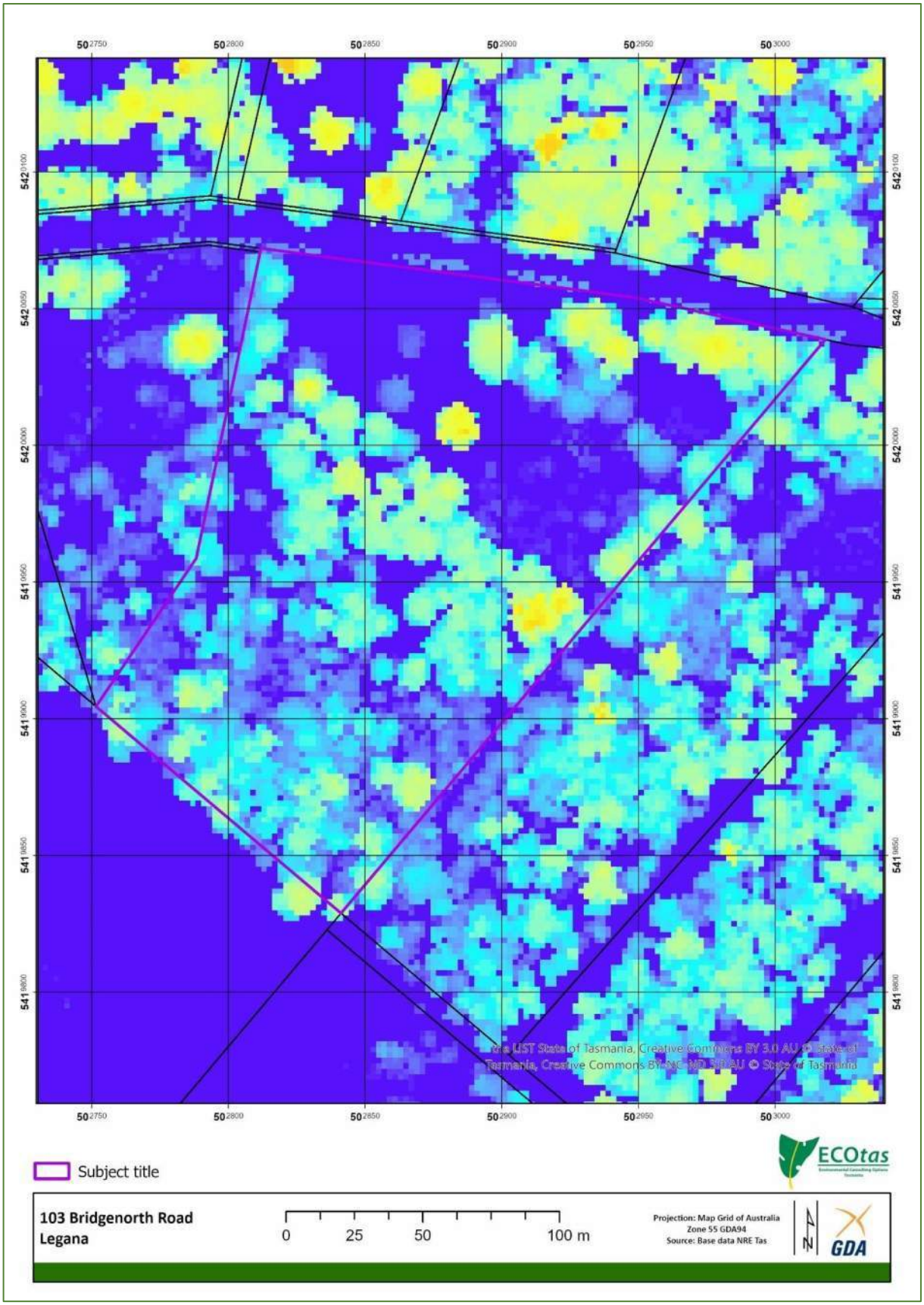

Figure 9. Tree canopy height modelling for study area and surrounds

METHODS

Nomenclature

All grid references in this report are in GDA94, except where otherwise stated.

Vascular species nomenclature follows de Salas & Baker (2024) for scientific names and Wapstra et al. (2005+) for common names. Fauna species scientific and common names follow the listings in the cited *Natural Values Atlas* report (DNRET 2024a).

Vegetation classification follows TASVEG 4.0, as described in *From Forest to Fjaeldmark: Descriptions of Tasmania's Vegetation (*Kitchener & Harris 2013+).

Preliminary investigation

Available sources of previous reports, threatened flora records, vegetation mapping and other potential environmental values were interrogated. These sources include:

- Tasmanian Department of Natural Resources & Environment Tasmania's *Natural Values Atlas* records for threatened flora and fauna (GIS coverage maintained by the author current as at date of report);
- Tasmanian Department of Natural Resources & Environment Tasmania's *Natural Values Atlas* report ECOtas_103BridgenorthRoad for a polygon defining the study area (centred on 502869mE 5419968mN), buffered by 5 km, dated 15 Dec. 2024 (DNRET 2024a) – Appendix E;
- Forest Practices Authority's *Biodiversity Values Database* report, specifically the species' information for grid reference centroid 502869mE 5419968mN (i.e. a point defining the approximate centre of the study area), buffered by 5 km and 2 km for threatened fauna and flora records, respectively, hyperlinked species' profiles and predicted range boundary maps, dated 15 Dec. 2024 (FPA 2024) – Appendix E;
- Commonwealth *Protected Matters Report* for a polygon defining the study area, buffered by 5 km, dated 15 Dec. 2024 (CofA 2024) – Appendix F;
- TASVEG vegetation coverages (as available through GIS coverage and via LISTmap);
- Google Earth, LISTmap aerial orthoimagery and ESRI World Imagery; and
- other sources listed in tables and text as indicated.

Field assessment

The assessment was undertaken by Mark Wapstra (ECO*tas*) on 16 Dec. 2024. Cadastral data uploaded to the iGIS application guided the in-field assessment (although all boundaries were marked by fences). Hand-held GPS (Garmin GPSMAP 66sr) was used to waypoint natural values features for future mapping purposes.

<u>Vegetation classification</u>

Vegetation was classified by waypointing vegetation transitions for later comparison to aerial imagery. The structure and composition of the vegetation types was described using nominal 30 m

radius plots at a representative site within the vegetation types, and compiling "running" species lists between plots and vegetation types.

Threatened flora

With reference to the threatened flora, the survey included consideration of the most likely habitats for such species. Where detected, hand-held GPS was used to mark the location of individual plants (in the case of flowering plants of *Caesia calliantha*) or the approximate middle and/or extent of a patch (in the case of *Brunonia australis*, where marking individual plants is not practical due to its growth habit).

Threatened fauna

Surveys for threatened fauna were largely limited to an examination of "potential habitat" (i.e. comparison of on-site habitat features to habitat descriptions for threatened fauna), and detection of tracks, scats and other signs, signs.

Weed and hygiene issues

The study area was assessed with respect to plant species classified as declared weeds under the Tasmanian *Biosecurity Act 2019* (*Biosecurity Regulations 2022*), Weeds of National Significance (WoNS) or "environmental weeds" (authors' opinion and as included in *A Guide to Environmental and Agricultural Weeds of Southern Tasmania*, NRM South 2017).

The study area was assessed with respect to potential impacts of plant and animal pathogens, by reference to habitat types and field symptoms.

FINDINGS

Vegetation types

Comments on TASVEG mapping

This section, which comments on the existing TASVEG mapping for the study area, is included to highlight the differences between existing mapping and the more recent mapping from the present study to ensure that any parties assessing land use proposals (via this report) do not rely on existing mapping. Note that TASVEG mapping, which was mainly a desktop mapping exercise based on aerial photography, is often substantially different to ground-truthed vegetation mapping, especially at a local scale. An examination of existing vegetation mapping is usually a useful pre-assessment exercise to gain an understanding of the range of habitat types likely to be present and the level of previous botanical surveys.

In this case, it is useful to examine the TASVEG 3.0, 4.0 & Live mapping because while the latter two should be the most up-to-date, the former has been used to inform the *Tasmanian Planning Scheme* and specifically the Regional Ecosystem Model's mapping of the Priority Vegetation Area

overlay. In this case, all versions of TASVEG are the same for the subject title, with the title mapped as follows (Figure 10):

- urban areas (TASVEG code: FUR)

  FUR is mapped across the northern ca. third to half of the titre, the polygon seemingly unrelated to the older green and white areas on topographic/cadastral maps (Figure 2) or to the apparent canopy of forest trees, however modified (Figure 3).

- *Eucalyptus amygdalina* forest and woodland on dolerite (TASVEG code: DAD)

  DAD is mapped across the southern ca. third to half of the title (see under FUR for commentary on the relationship of the polygon of DAD to forest canopy cover and land use history).

Vegetation types recorded as part of the present study

Vegetation types have been classified according to TASVEG 4.0, as described in *From Forest to Fjaeldmark: Descriptions of Tasmania's Vegetation* (Kitchener & Harris 2013+). Table 1 provides information on the mapping units identified from the subject title (see also Figure 11). Refer to Appendix A for a more detailed description of the native vegetation mapping unit identified from the subject title.

Table 1. Vegetation mapping units present in subject title

[conservation status: NCA – as per Schedule 3A of the Tasmanian *Nature Conservation Act 2002*, using units described by Kitchener & Harris (2013+), relating to TASVEG mapping units (DNRET 2024b); EPBCA – as per the listing of ecological communities on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*, relating to communities as described under that Act, but with equivalencies to TASVEG units]

TASVEG mapping unit (Kitchener & Harris 2013+)	**Conservation priority** NCA *EPBCA*	**Comments**
Dry eucalypt forest and woodland		
Eucalyptus amygdalina forest and woodland on dolerite (DAD)	not threatened *not threatened*	DAD has been mapped in three sections, with only a relatively narrow central band being described as "intact" relative to the patches north and south of this that have been described as "modified". The "intact" band has a relatively low canopy dominated by *Eucalyptus amygdalina* over variably dense tall shrubs, in turn over a largely grassy-graminoid-dominated ground layer. Apart from very minor weed occurrences (all being treated), this band of DAD is in relatively good condition, facilitated by the fencing to the north (and on its southwestern and northwestern boundaries), lack of active use of the modified area to the south, and the relatively extensive exposures of dolerite throughout (preventing active management such as slashing). South and northeast of the "intact" band of DAD, DAD is expressed in modified form. While the canopy is largely "intact", the shrub component is largely absent and the ground layer is now dominated by grass species (mixture of native and naturalised species). Absence of exposed dolerite in the southern area has allowed frequent slashing that has maintained the simple structure and composition. The presence of rock exposures and steeper slopes to the north have allowed some retention of understorey elements, albeit lacking in particular species such as *Brunonia australis* and *Caesia calliantha* recorded from the "intact" band of DAD. In some ways, the two patches of DAD marked as "modified" could be better mapped as part

TASVEG mapping unit (Kitchener & Harris 2013+)	**Conservation priority** NCA *EPBCA*	**Comments**
		of a broader concept of FUR (although the lack of residential elements essentially precludes this) or improved pasture with native tree canopy (TASVEG code: FAC), the latter also essentially precluded because the site is not managed for primary production and both sites retain a relatively high proportion of native elements.
Modified land		
urban areas (FUR)	not threatened *not threatened*	The fenced urban yard is mapped as FUR. See also comments under DAD and FAG.
agricultural land (FAG)	not threatened *not threatened*	FAG has been mapped on the gentle slopes south of Bridgenorth Road and wets of the fenced urban yard. It includes the constructed pond as well as scattered remnant trees. The ground layer is wholly modified. This area could be subsumed into a broader concept of FUR, given the lack of formal primary production occurring. Note that under TASVEG 5.0, FAG has been re-coded as FAL.

Conservation significance of identified vegetation types

None of the TASVEG mapping units identified from the study area equate to native vegetation communities listed as threatened on Schedule 3A of the Tasmanian *Nature Conservation Act 2002* or to threatened ecological communities listed under the Commonwealth *Environment Protection and Biodiversity Protection Act 1999*.

Occurrences of DAD do not meet the intent of "priority vegetation" pursuant to the *State Planning Provisions*, which is defined as follows:

C7.3 Definition of Terms

C7.3.1 In this code, unless the contrary intention appears:

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.

That is, C7.3.1(a) is not applicable to any part of the subject title.

The concept of "native vegetation…[that] has been identified as native vegetation of local importance", i.e. C7.3.1(d), is not defined through the *State Planning Provisions* nor any guidance documents provided through the Tasmanian Planning Commission on the Natural Assets Code. Thus, it falls to professional opinion to interpret C7.3.1(d). In this case, DAD is widespread and well reserved at a Statewide level (156,100 ha, 31% reserved[1]) and bioregional (Northern Midlands) level (26,600 ha, 16% reserved[1]). At a sub-regional level (e.g. municipal), DAD is less well-represented and well-reserved (7,100 ha, 8% reserved[1]), although this is expected for this part of the State. In my opinion, the area within the title mapped as DAD does not reasonably qualify as "priority vegetation" under C7.3.1(d).

[[1] source: http://dpipwe.tas.gov.au/conservation/development-planning-conservation-assessment/planning-tools/tasmanian-reserve-estate-spatial-layer– note that this layer is based on June 2020 data]

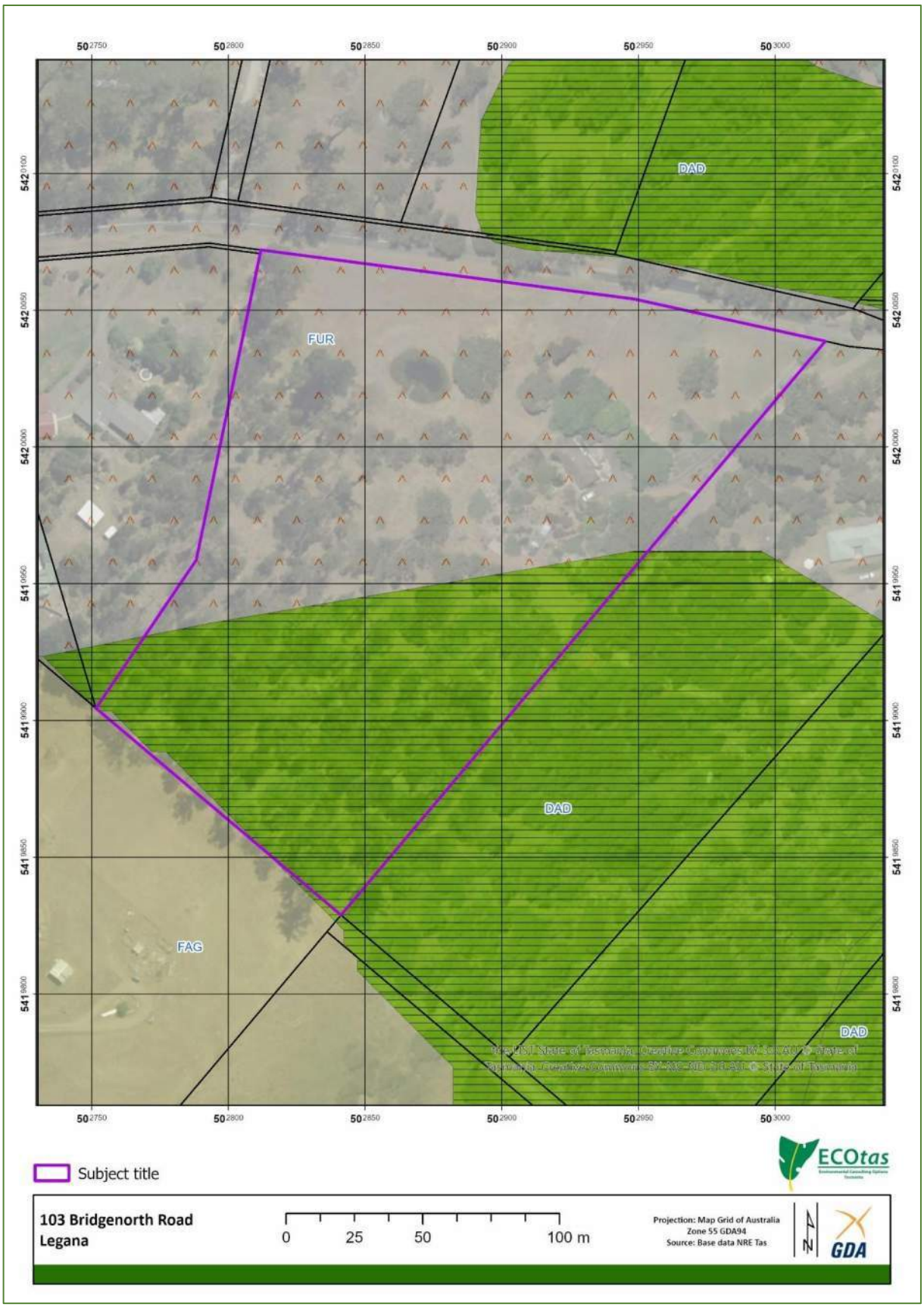

Figure 10. Study area and surrounds showing existing TASVEG vegetation mapping (see text for codes)

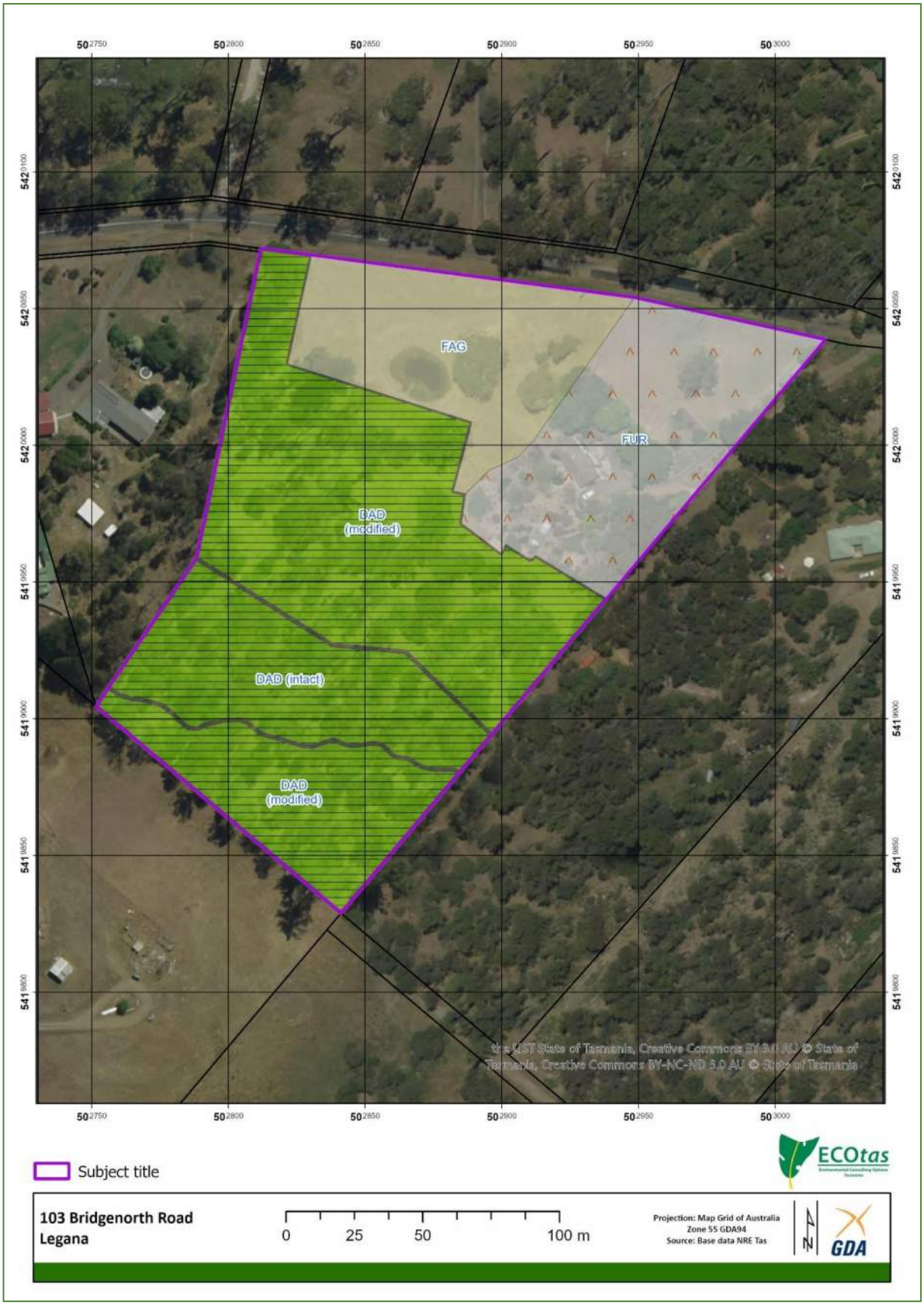

Figure 11. Revised vegetation mapping for study area (see text for codes)

Plant species

General information

A total of 73 vascular plant species were recorded from the study area (Appendix B), comprising 45 dicotyledons (including 1 endemic and 5 naturalised species) and 28 monocotyledons (including 8 naturalised).

Additional surveys at different times of the year may detect additional short-lived herbs and grasses but a follow-up survey is not considered warranted because of the low likelihood of additional species with a high priority for conservation management being present (see also **FINDINGS *Plant species*** Threatened flora).

Threatened flora

Database information indicates that the subject title does not support known populations of flora listed as threatened on the Tasmanian *Threatened Species Protection Act 1995* and/or the Commonwealth *Environment Protection and Biodiversity Protection Act 1999* (Figure 12). Figure 12 indicates threatened flora species near to the study area and Table C1 (Appendix C) provides a listing of threatened flora from within 5,000 m of the study area (nominal buffer width usually used to discuss the potential of a particular study area to support various species listed in databases), with comments on whether potential habitat is present for the species, and possible reasons why a species was not recorded.

Site assessment resulted in the detection of two species listed as threatened (both as rare, Schedule 5) on the Tasmanian *Threatened Species Protection Act 1995* (Figure 13), as follows.

- *Brunonia australis* (blue pincushion) [TSPA: rare]

Brunonia australis typically occurs in grassy woodlands and dry sclerophyll forests dominated by *Eucalyptus amygdalina* or less commonly *E. viminalis* or *E. obliqua*. Some smaller populations are found in heathy and shrubby dry forests. The species occurs on well-drained flats and gentle slopes between 10-350 m a.s.l. It is most commonly found on sandy and gravelly alluvial soils, with a particular preference for ironstone gravels. Populations found on dolerite are usually small (FPA 2022).

Plate 13. (LHS) Flowering plant of *Brunonia australis* from subject title

Plate 14. (RHS) Rosette leaves with scape of *Brunonia australis* from subject title

Brunonia australis is known from several widespread sites in the greater Bridgenorth-Legana area (Figure 12). The present survey detected the species from several sites within the "intact" DAD vegetation along the gentle ridgeline (Figure 13), where it occurred amongst grassy understorey (Plates 13-18). Twenty-five point locations were recorded, although the number of individuals is much greater than this because each point represents a patch of the species. The species grows as rosettes of leaves with flowering scapes – counting individuals in a dense cluster of leaves is not practical. However, as a broad estimate, the population is estimated at ca. 125-625 individuals (i.e. 5-25 x the number of collected waypoints).

Plate 15. (LHS) Typical open grassy habitat of *Brunonia australis* in subject title (patch circled)

Plate 16. (RHS) Denser patch of *Brunonia australis* showing scattered flowering scapes but numerous rosette leaves (challenging to estimate abundance)

Plates 17 & 18. Typical open grassy habitat of *Brunonia australis* in subject title – both these sites are associated with wood piles created from clean-up of windthrown trees (plants circled)

- *Caesia calliantha* (blue grasslily) [TSPA: rare]

Caesia calliantha is found predominantly in the Midlands in grassland or grassy woodland including wattle and prickly box "scrub" (occasionally extending into forest, then usually dominated by *Eucalyptus viminalis* or *E. amygdalina*). It has also been recorded from grassy roadsides (FPA 2022).

Caesia calliantha is known from several widespread sites in the greater Bridgenorth-Legana area (Figure 12). The present survey detected the species from four sites within the "intact" DAD vegetation along the gentle ridgeline (Figure 13), where it occurred amongst grassy understorey (refer Plate 15 for typical habitat and Plates 19 & 20 for plant images). The population estimate is notionally the same as the recorded waypoints, which represented the flowering individuals, although it is likely that there are non-flowering individuals within the same clump or elsewhere. When not in flower, the species is very difficult to find, especially when growing amongst tussocks of species such as *Lomandra longifolia* as it was at this site.

Plate 19. (LHS) Flowering plant of *Caesia calliantha* amongst *Lomandra longifolia* in subject title

Plate 20. (RHS) Close-up of flower of *Caesia calliantha* [Powranna Road, 6 Dec. 2021]

For *Brunonia australis*, the site does not represent a range extension nor infilling and the habitat is highly typical. For *Caesia calliantha*, the site represents a minor (ca. 4 km) range extension (Figure 14). It is notable that both species are apparently absent from the frequently mown and/or grazed parts of the title (i.e. the areas mapped as "modified" DAD), which is consistent with observations elsewhere. The species are reasonably tolerant of disturbance such as native forest silviculture and "rough grazing" and can persist in small remnants such as isolated bushland reserves and road verges but tends to disappear with long-persistent ground layer manipulation (M. Wapstra pers. obs.).

If the proposed subdivision layout is superimposed on the distribution of threatened flora within the title, it seems reasonable to consider that the sites supporting these species can be practically excluded from development (Figure 13). Some locations are notionally close to what will become an internal lot boundary but this is already fenced such that impact to threatened flora can be practically avoided. The proposed Lot 2 is of sufficient extent to allow placement of a dwelling and associated hazard management area that excludes all recorded sites of threatened flora. That said,, any activities that are anticipated to result in specimens of threatened flora being "knowingly taken" will require a permit under Section 51 of the Tasmanian *Threatened Species Protection Act 1995* (TSPA). See **DISCUSSION *Legislative and policy implications*** for further details.

The presence of populations of threatened flora means that part of the site is "a threatened flora species" [sic] such that it can be reasonably construed as "priority vegetation" (in relation to this value) pursuant to C7.3.1(b) of the *State Planning Provisions* (see previous citation of definition of "priority vegetation" at **FINDINGS *Vegetation types*** Conservation significance of identified vegetation types).

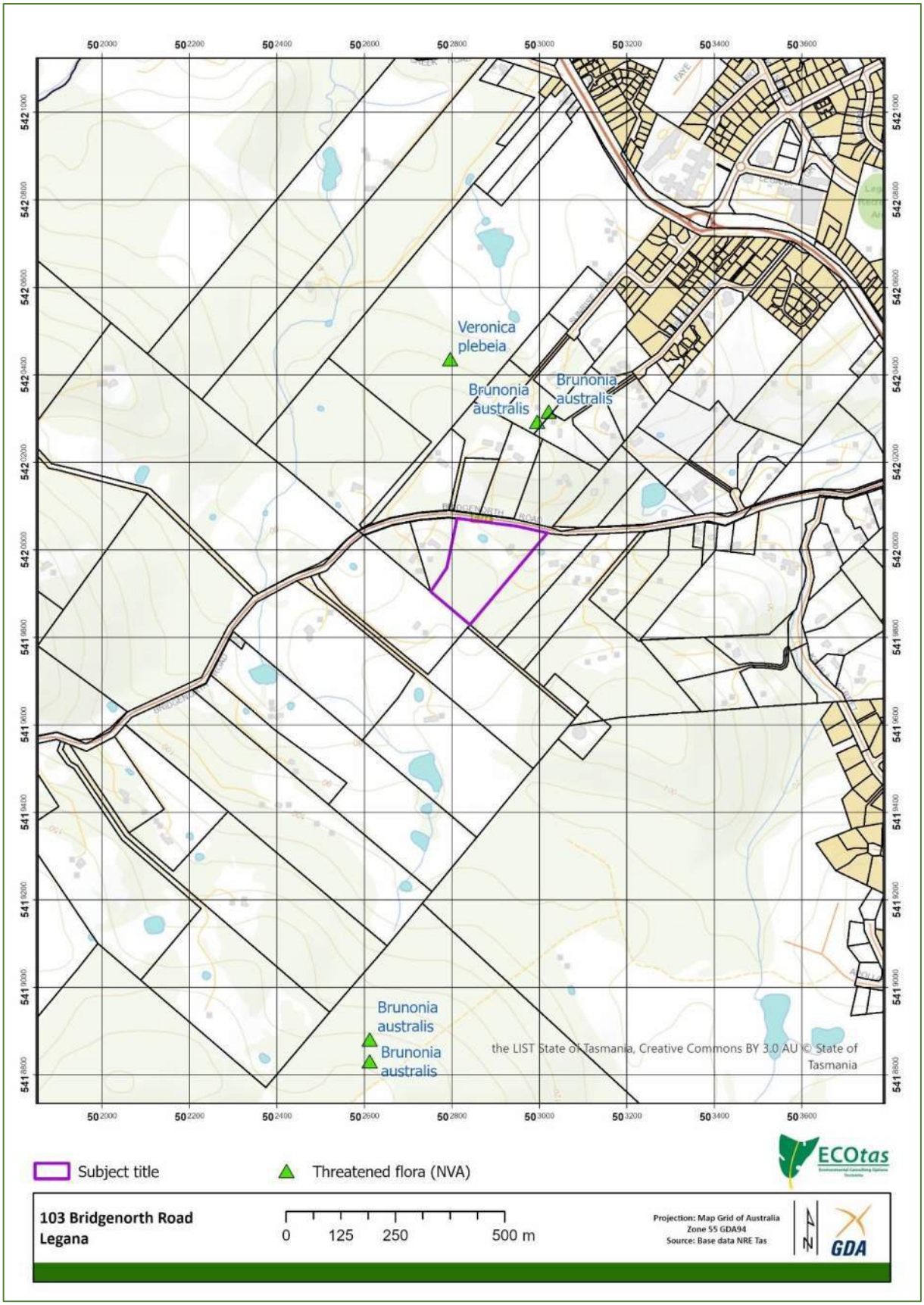

Figure 12. Distribution of threatened flora close to study area

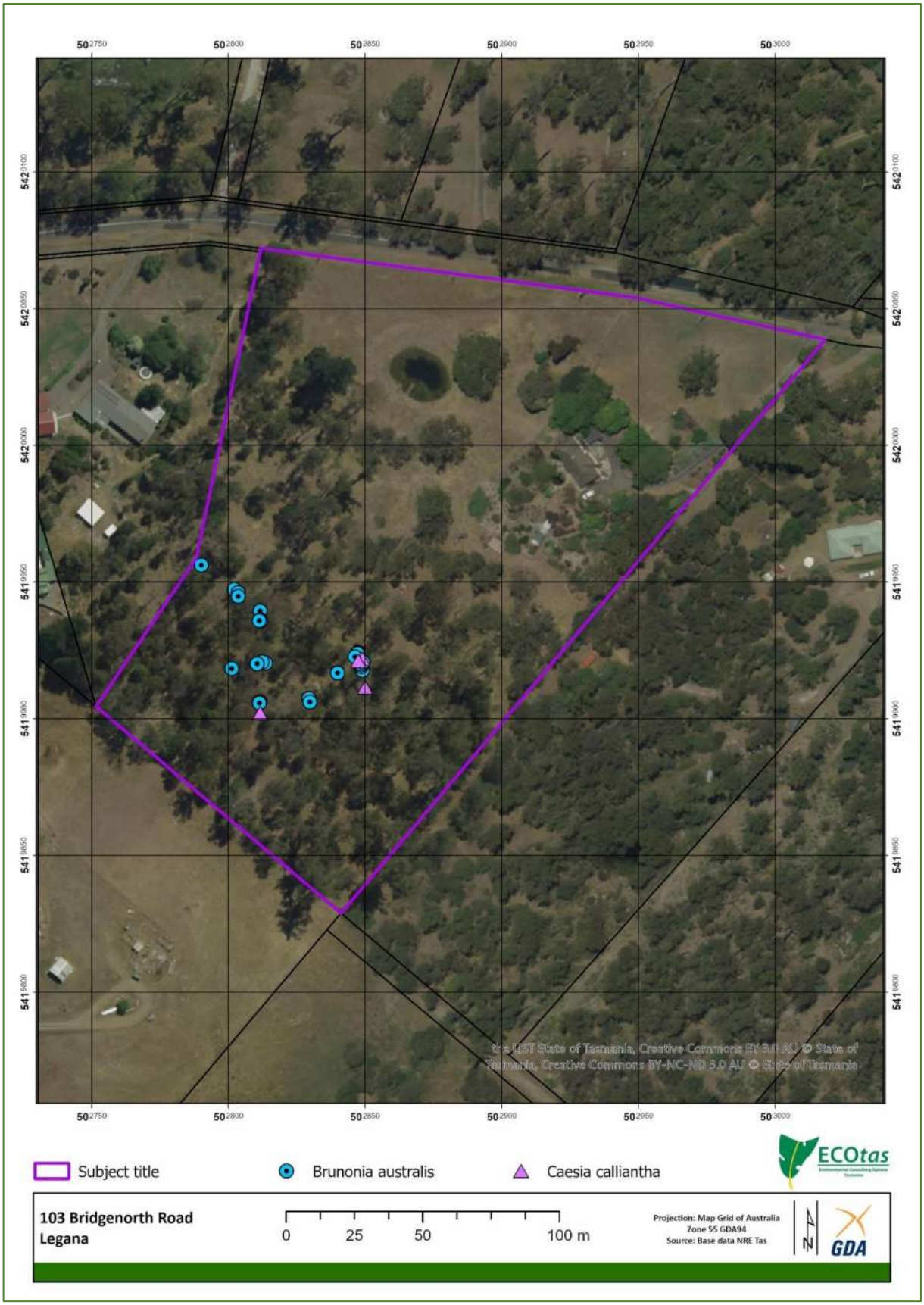

Figure 13a. Distribution of threatened flora within study area (present study)

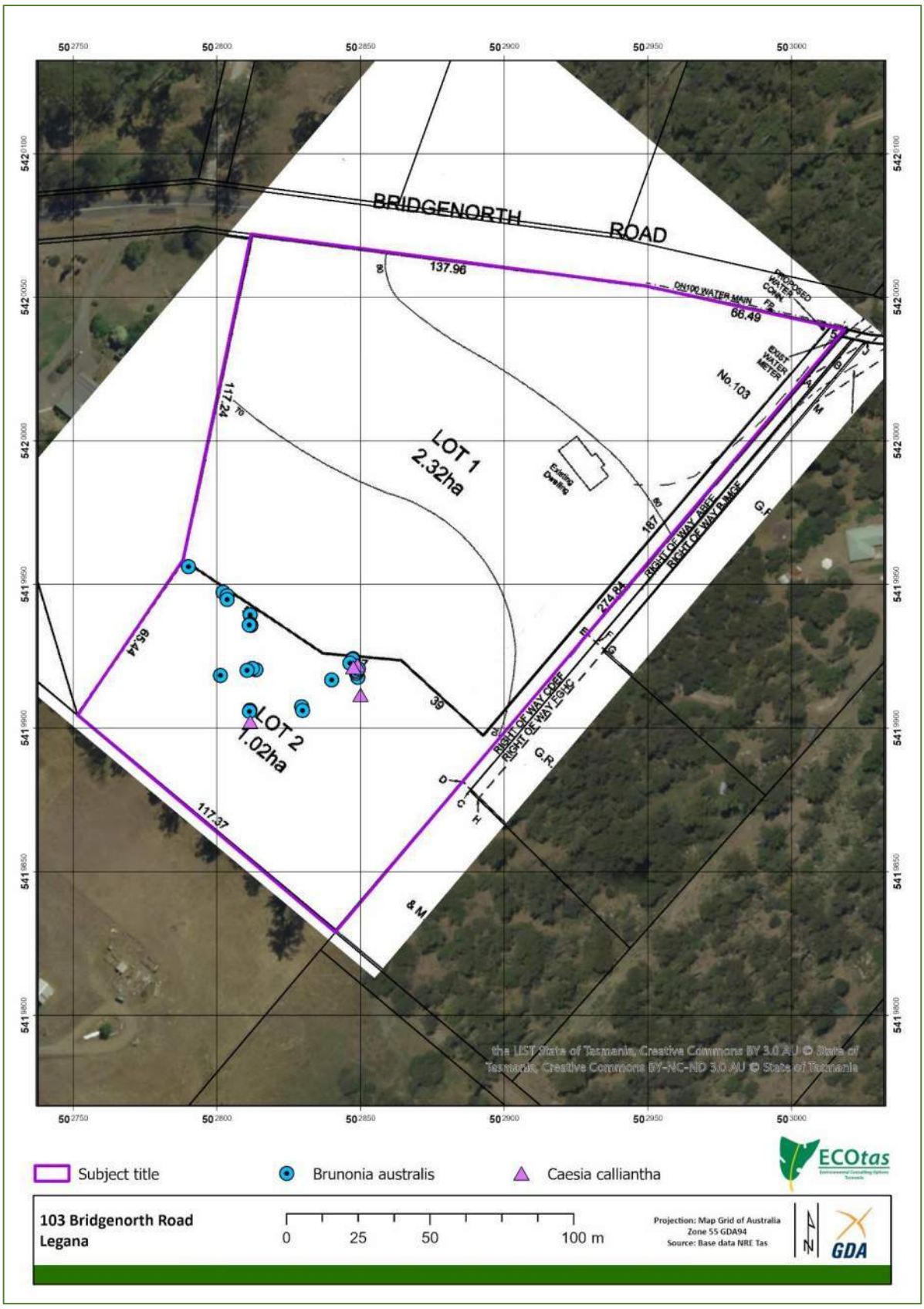

Figure 13b. Distribution of threatened flora within study area (present study) relative to proposed subdivision

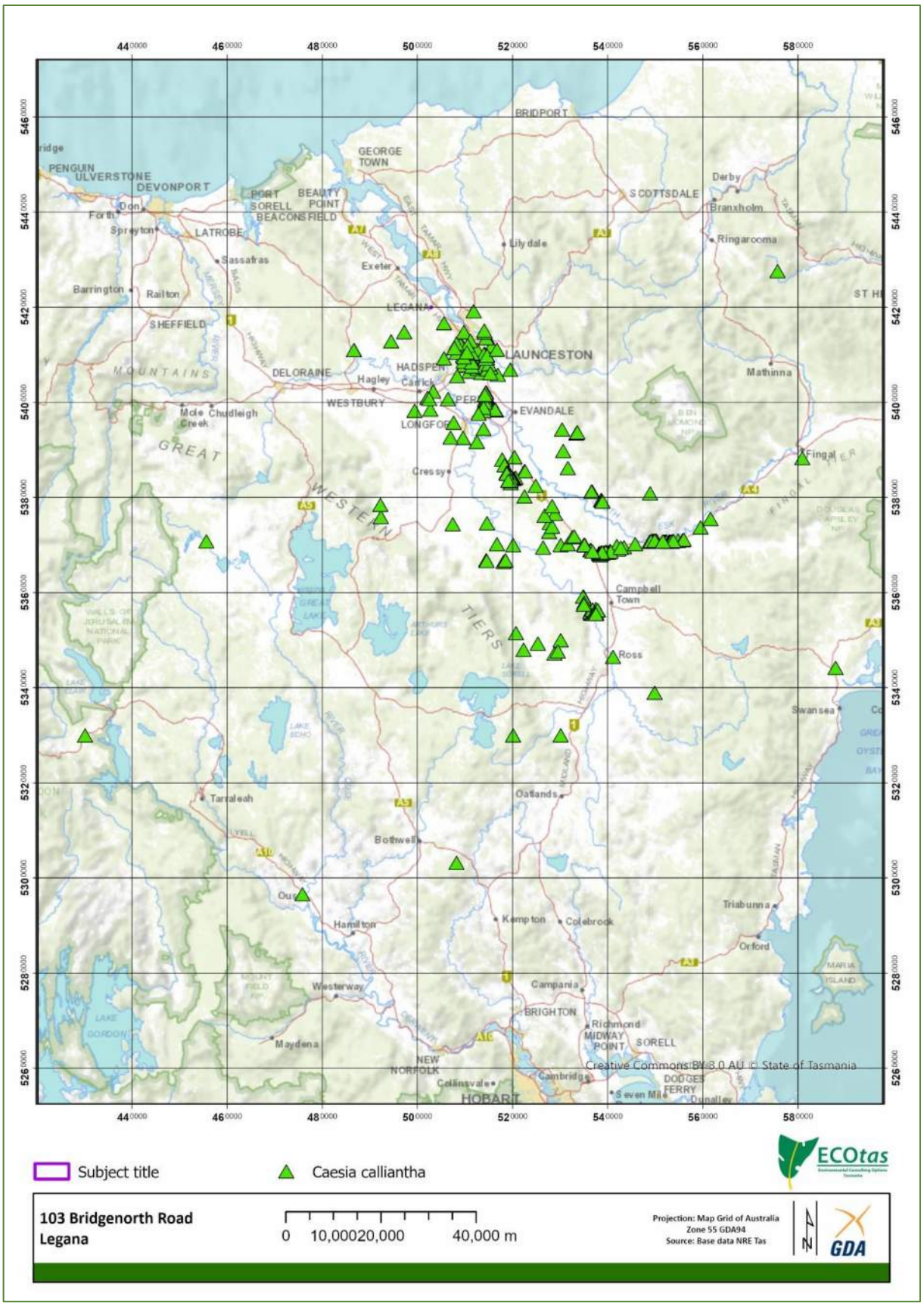

Figure 14a. Statewide distribution of *Caesia calliantha* [source: *Natural Values Atlas*, 28 Dec. 2024]

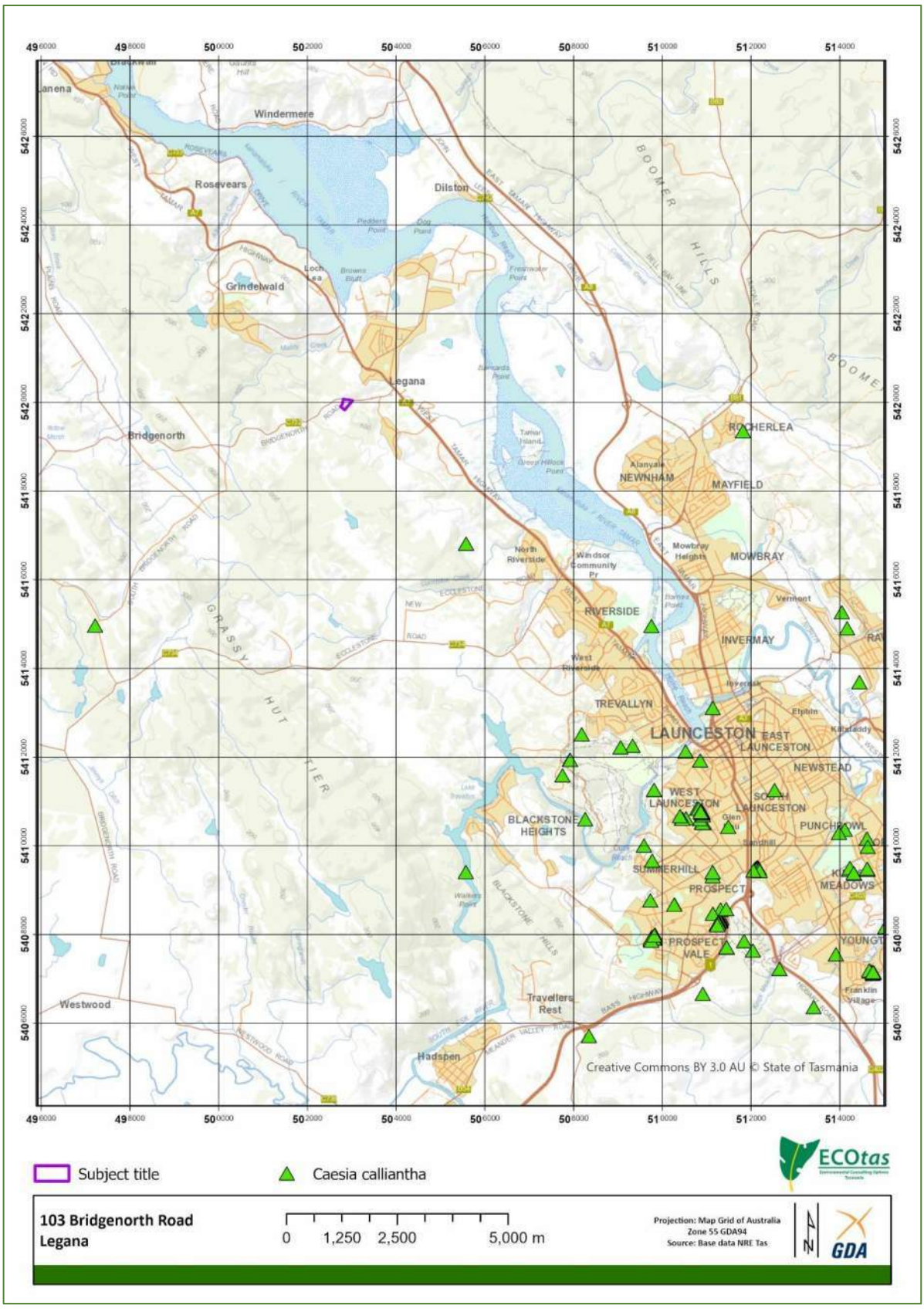

Figure 14b. Regional distribution of *Caesia calliantha* [source: *Natural Values Atlas*, 28 Dec. 2024] showing study area (range extension of ca. 4 km)

Threatened fauna

Database information indicates that the subject title does not support known populations of fauna listed as threatened on the Tasmanian *Threatened Species Protection Act 1995* (TSPA) and/or the Commonwealth *Environment Protection and Biodiversity Protection Act 1999* (EPBCA) (Figure 15).

Figure 15 indicates threatened fauna species near to the study area and Table D1 (Appendix D) provides a listing of threatened fauna from within 5,000 m of the study area (nominal buffer width usually used to discuss the potential of a particular study area to support various species listed in databases), with comments on whether potential habitat is present for the species, and possible reasons why a species was not recorded.

Site assessment indicated that the subject title supports ubiquitous potential habitat for a suite of threatened fauna species. This includes potential habitat of species such as *Sarcophilus harrisii* (Tasmanian devil), *Dasyurus maculatus* subsp. *maculatus* (spotted-tailed quoll), *Dasyurus viverrinus* (eastern quoll) and *Perameles gunnii* subsp. *gunnii* (eastern barred bandicoot). However, these species occur in a range of habitats from untouched wilderness to suburban yards, meaning it is very hard to place a patch of regrowth-structured even-aged forest at a specific position on this continuum and conclude that it is therefore "important" or "significant" at any particular scale. Small-scale development will result in the loss and/or modification of potential habitat but this is not anticipated to have a significant impact at any reasonable scale in the wider context of residential development in the area.

No part of the site is considered to support "significant habitat for a threatened fauna species", such that no part of the site is construed as "priority vegetation" (in relation to this value) pursuant to C7.3.1(c) of the *State Planning Provisions* (see previous citation of definition of "priority vegetation" at **FINDINGS *Vegetation types*** Conservation significance of identified vegetation types), where "significant habitat" is defined to mean:

> the habitat within the known or core range of a threatened fauna species, where any of the following applies:
>
> (a) is known to be of high priority for the maintenance of breeding populations throughout the species' range; or
>
> (b) the conversion of it to non-priority vegetation is considered to result in a long-term negative impact on breeding populations of the threatened fauna species.

Problematically, the *Scheme* does not define the terms "known" or "core" range, which means this could rely on those used by other agencies such as the Forest Practices Authority and/or the Department of Natural Resources and Environment Tasmania, which are effectively presented in the relevant database reports (DNRET 2024a; FPA 2024). While the subject site is within the so-called "known or core range" of several listed fauna species, for several of these (notably species such as the Tasmanian devil, spotted-tailed quoll, eastern quoll, eastern barred bandicoot) in no manner can any part of the site likely to be developed be assigned as being of "high priority for the maintenance of breeding populations throughout the species' range" at any reasonable scale (see Appendix D for a more detailed analysis of this) or be in any way construed as meeting the intent of a scenario in which "the conversion of it [i.e. "significant habitat"] to non-priority vegetation [could be] considered to result in a long-term negative impact on breeding populations of the threatened fauna species" (see also Appendix D for a more detailed analysis of this).

That is, C7.3.1(c) is applicable to substantial parts of the title. Refer to **DISCUSSION *Legislative and policy implications*** for a more detailed analysis of this concept.

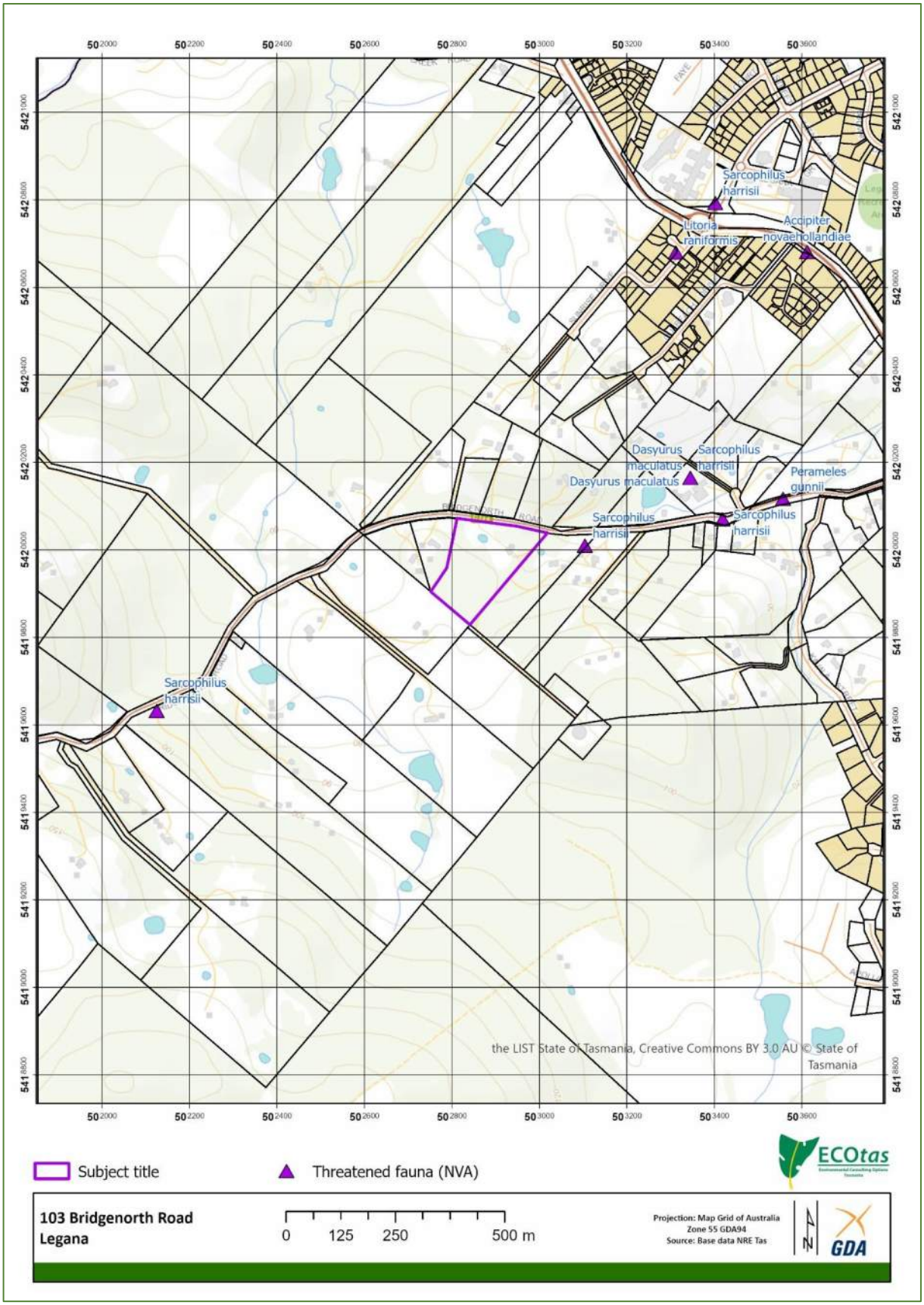

Figure 15a. Distribution of threatened fauna close to study area (overview)

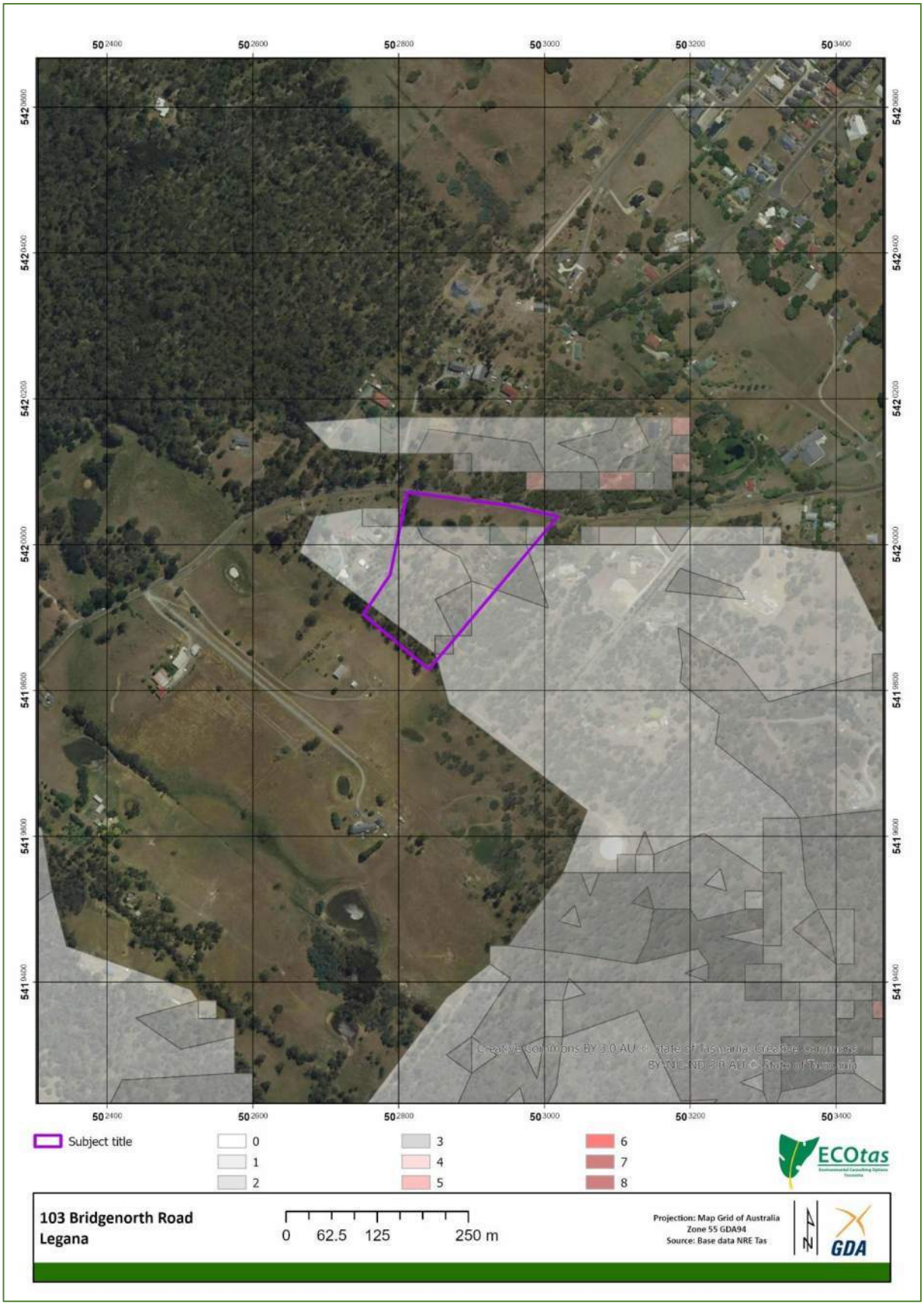

Figure 15b. Modelled eagle nest habitat within and close to study area

Other natural values

Weed species

No plant species classified as declared weeds within the meaning of the Tasmanian *Biosecurity Act 2019* (*Biosecurity Regulations 2022*) were detected from the study area.

Several planning manuals provide guidance on appropriate management actions, which can be referred to develop site-specific prescriptions for any proposed works in the title area. These manuals include:

- Allan, K. & Gartenstein, S. (2010). *Keeping It Clean: A Tasmanian Field Hygiene Manual to Prevent the Spread of Freshwater Pests and Pathogens*. NRM South, Hobart;
- Rudman, T. (2005). *Interim* Phytophthora cinnamomi *Management Guidelines*. Nature Conservation Report 05/7, Biodiversity Conservation Branch, Department of Primary Industries, Water & Environment, Hobart;
- Rudman, T., Tucker, D. & French, D. (2004). *Washdown Procedures for Weed and Disease Control*. Edition 1. Department of Primary Industries, Water & Environment, Hobart; and
- DPIPWE (2015). *Weed and Disease Planning and Hygiene Guidelines – Preventing the Spread of Weeds and Diseases in Tasmania*. Department of Primary Industries, Parks, Water & Environment, Hobart.

Myrtle wilt

Myrtle wilt, caused by a wind-borne fungus (*Davidsoniella* syn. *Chalara australis*), occurs naturally in rainforest where myrtle beech (*Nothofagus cunninghamii*) is present. The fungus enters wounds in the tree, usually caused by damage from wood-boring insects, wind damage and forest clearing. The incidence of myrtle wilt often increases forest clearing events such as windthrow and wildfire.

The study area does not support *Nothofagus cunninghamii*. No special management is required.

Rootrot pathogen, *Phytophthora cinnamomi*

Phytophthora cinnamomi (PC) is widespread in lowland areas of Tasmania, across all land tenures. However, disease tends not to develop when soils are too cold or too dry. For these reasons, PC is not usually considered a threat to susceptible plant species that grow at elevations higher than about 700 m or where annual rainfall is less than about 600 mm (e.g. Midlands and Derwent Valley). Furthermore, disease is less likely to develop beneath a dense canopy of vegetation because shading cools the soils to below the optimum temperature for the pathogen. A continuous canopy of vegetation taller than about 2 m is usually sufficient to suppress disease. Hence PC is not usually considered a threat to susceptible plant species growing in wet sclerophyll forests, rainforests (except disturbed rainforests on infertile soils) and scrub e.g. teatree scrub (Rudman 2005; FPA 2009).

The native vegetation type identified from the study area is not recognised as being susceptible to PC, except in particular circumstances. Site assessment did not record any field symptoms (dead and/or dying susceptible plant species).

It is reasonable to assume that the study area is free of the pathogen and that future management presents a very low risk of introducing it to the site, which is already modified. Special management should not be warranted.

Myrtle rust

Myrtle rust is a disease limited to plants in the Myrtaceae family. This plant disease is a member of the guava rust complex caused by *Austropuccinia psidii*, a known significant pathogen of Myrtaceae plants outside Australia. Infestations are currently limited to NSW, Victoria, Queensland and Tasmania (DPIPWE 2015).

No evidence of myrtle rust was noted (possible indicator species present). The longer-term management issue for the site is to ensure that any ornamental plantings source plants from a reputable nursery free from the pathogen (such businesses are already subject to strict biosecurity conditions).

Chytrid fungus and other freshwater pathogens

Native freshwater species and habitat are under threat from freshwater pests and pathogens including *Batrachochytrium dendrobatidis* (chytrid frog disease), *Mucor amphibiorum* (platypus mucor disease) and the freshwater algal pest *Didymosphenia geminata* (didymo) (Allan & Gartenstein 2010). Freshwater pests and pathogens are spread to new areas when contaminated water, mud, gravel, soil and plant material or infected animals are moved between sites. Contaminated materials and animals are commonly transported on boots, equipment, vehicles tyres and during road construction and maintenance activities. Once a pest pathogen is present in a water system it is usually impossible to eradicate. The manual *Keeping it Clean: A Tasmanian Field Hygiene Manual to Prevent the Spread of Freshwater Pests and Pathogens* (Allan & Gartenstein 2010) provides information on how to prevent the spread of freshwater pests and pathogens in Tasmanian waterways wetlands, swamps and boggy areas.

The wider study area supports potential habitat of amphibians (mainly in the form of constructed ponds) but the parts of the title where works are proposed are very dry and well-drained, such that special management should not be warranted.

Additional "Matters of National Environmental Significance" – Threatened Ecological Communities

CofA (2024) indicates that the following threatened ecological communities listed on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) are likely to occur within the area:

- Lowland Native Grasslands of Tasmania [Critically Endangered];
- Tasmanian Forests and Woodlands dominated by Black Gum or Brookers Gum (*Eucalyptus ovata* / E*. brookeriana*) [Critically Endangered]; and
- Tasmanian White Gum (*Eucalyptus viminalis*) Wet Forest [Critically Endangered].

Existing vegetation mapping (Figure 10) and revised vegetation mapping (Figure 11) indicates that these communities are not present within or adjacent to the subject title i.e. there are no implications under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* in relation to threatened ecological communities.

DISCUSSION

Summary of key findings

Threatened flora

- No plant species listed as threatened on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) are known from database information, or were detected as consequence of site assessment, from the study area.
- Two plant species listed as threatened on the Tasmanian *Threatened Species Protection Act 1995* (TSPA) were detected as consequence of site assessment from the study area, as follows:
  - *Brunonia australis* (blue pincushion): locally abundant in less disturbed part of title; and
  - *Caesia calliantha* (blue grasslily): localised to scattered plants in less disturbed part of title.
- The presence of populations of threatened flora means that parts of the site are "a threatened flora species" [sic] such that these areas can be reasonably construed as "priority vegetation" (in relation to this value) pursuant to C7.3.1(b) of the *State Planning Provisions*.

Threatened fauna

- No fauna species listed as threatened on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) and/or the Tasmanian *Threatened Species Protection Act 1995* (TSPA) are known from database information, or were detected as a consequence of site assessment, from the study area.
- The study area supports potential habitat (to varying degrees) for the following species:
  - *Sarcophilus harrisii* (Tasmanian devil);
  - *Dasyurus maculatus* subsp. *maculatus* (spotted-tailed quoll);
  - *Dasyurus viverrinus* (eastern quoll);
  - *Perameles gunnii* subsp. *gunnii* (eastern barred bandicoot);
  - *Aquila audax* subsp. *fleayi* (Tasmanian wedge-tailed eagle);
  - *Haliaeetus* [syn. *Ichthyophaga*] *leucogaster* (white-bellied sea-eagle);
  - *Accipiter* [syn. *Tachyspiza*] *novaehollandiae* (grey goshawk);
  - *Myiagra cyanoleuca i(*satin flycatcher);
  - *Neophema chrysostoma* (blue-winged parrot); and
  - *Tyto novaehollandiae* subsp. *castanops* (Tasmanian masked owl).
- The absence of "significant habitat for a threatened fauna species", at any reasonable scale or interpretation of the concept, means that the site cannot be "priority vegetation" (in relation to this value) pursuant to C7.3.1(c) of the *State Planning Provisions*.

Vegetation types

- The study area supports the following TASVEG mapping units:

  - *Eucalyptus amygdalina* forest and woodland on dolerite (TASVEG code: DAD);
  - agricultural land (TASVEG code: FAG – now coded as FAL): and
  - urban areas (TASVEG code: FUR).
- Occurrences of DAD do not equate to a native vegetation community listed as threatened on Schedule 3A of the Tasmanian *Nature Conservation Act 2002*.
- Occurrences of DAD do not equate to a threatened ecological community listed under the Commonwealth *Environment Protection and Biodiversity Protection Act 1999*.
- The absence of "native vegetation [that] forms an integral part of a threatened native vegetation community as prescribed under Schedule 3A of the *Nature Conservation Act 2002*" means that the site cannot be "priority vegetation" (in relation to this value) pursuant to C7.3.1(a) of the *State Planning Provisions*.

Weeds

- No plant species classified as declared weeds within the meaning of the Tasmanian *Biosecurity Act 2019* (*Biosecurity Regulations 2022*) were detected from the study area.

Plant disease

- No evidence of *Phytophthora cinnamomi* (PC, rootrot) was recorded within the study area.
- No evidence of myrtle wilt was recorded from within the study area.
- No evidence of myrtle rust was recorded from within the study area.

Animal disease (chytrid)

- The study area does support habitats conducive to frog chytrid disease but these will be wholly retained within the balance lot.

Legislative and policy implications

Some commentary is provided below with respect to the key threatened species, vegetation management and other relevant legislation. Note that there may be other relevant policy instruments in addition to those discussed. The following information does not constitute legal advice and it is recommended that independent advice is sought from the relevant agency/authority.

Tasmanian *Threatened Species Protection Act 1995*

Threatened flora and fauna on this Act are managed under Section 51, as follows:

> 51. Offences relating to listed taxa
>
> (1) Subject to subsections (2) and (3), a person must not knowingly, without a permit –
>
> (a) take, keep, trade in or process any specimen of a listed taxon of flora or fauna; or
>
> (b) disturb any specimen of a listed taxon of flora or fauna found on land subject to an interim protection order; or
>
> (c) disturb any specimen of a listed taxon of flora or fauna contrary to a land management agreement; or

(d) disturb any specimen of a listed taxon of flora or fauna that is subject to a conservation covenant entered into under Part 5 of the *Nature Conservation Act 2002*; or

(e) abandon or release any specimen of a listed taxon of flora or fauna into the wild.

(2) A person may take, keep or process, without a permit, a specimen of a listed taxon of flora in a domestic garden.

(3) A person acting in accordance with a certified forest practices plan or a public authority management agreement may take, without a permit, a specimen of a listed taxon of flora or fauna, unless the Secretary, by notice in writing, requires the person to obtain a permit.

(4) A person undertaking dam works in accordance with a Division 3 permit issued under the *Water Management Act 1999* may take, without a permit, a specimen of a listed taxon of flora or fauna.

The simplest interpretation of this is that any activity that results in a specimen (i.e. individual) of listed flora or fauna being "knowingly taken" would require a permit to be issued through Conservation Assessments, Department of Natural Resources and Environment Tasmania, through a formal application process.

In this case, the sites supporting *Brunonia australis* (blue pincushion) and *Caesia calliantha* (blue grasslily) are located such that it should be practical to avoid not "taking" individuals. If this is achieved, a permit will not be required. Should a permit become required (because works are anticipated to directly impact on the species), the preceding report provides estimates of the abundance of each species with precise point locations.

The challenge is not so much at the time of administrative act of subdivision and approval but at the time of preparation of the subdivision for sale of lots and/or owner occupation of a lot(s) that may support the species. Noting the presence of the species on the title may be appropriate to maximise the opportunity for a future owner to be aware of the species and take due legislative/policy account of its presence. In this case, however, the administrative act of subdivision will not result in either species being "knowingly taken", future works would still need to take account of the species. That said, there is an existing fence between what will become the lot boundary (such that impact to threatened flora is possible to avoid) and it should be possible to locate a dwelling and an associated hazard management area (or other activities within the title such as wastewater area) to avoid the species.

The key question, therefore, at this stage of planning is whether NRE Tas would issue a permit to take threatened flora associated with either the development application for subdivision (and development of access/services) or for future occupation of lots. For some species, it is possible to reasonably anticipate how NRE Tas could respond to an application (e.g. a proposal to take a small number of plants from a locally abundant population of a widespread and well-reserved "threatened" species). In this case, detailed information has been presented as to why the loss of some individuals of *Brunonia australis* (blue pincushion) and *Caesia calliantha* (blue grasslily) is viewed as quite inconsequential to the conservation status of the species. If NRE Tas were to issue a permit, the secondary question is then what permit conditions may be associated with the permit. In this case, given the very likely avoidance of threatened flora, this question may be moot.

All that said, it is not my role to provide legal advice nor "second guess" what NRE Tas may require through the permit application process such that there is a risk that a planning permit could be issued under the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule* and a permit to take threatened flora under Section 51 of the TSPA not be issued in concordance with such a planning permit. This could mean having to modify the original planning application. To mitigate the risk of permit non-compatibility, this report could be used to apply for a permit to take threatened flora prior to submitting a development application (at this stage, not required). However, there is a similar risk that such a permit would then need to be varied (or reapplied for) if a planning permit was not granted under the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule*. There is no simple approach to this process, particularly in this scenario where

the administrative act of issuing a planning permit does not result in the individual "taking" of any threatened species i.e. a permit under Section 51 is not technically required (perhaps not even possible) at this stage.

If a development permit is issued prior to a threatened species permit and it does not include any conditions related to the management of threatened flora, it does not provide an exemption from the requirements of a threatened species permit. Under the Tasmanian *Threatened Species Protection Act 1995*, a permit is required if threatened species will be "knowingly" taken (and clearly the present report has confirmed the presence of threatened flora species and this information will be added to the *Natural Values Atlas* to become publicly available). This means that a development permit can be issued first and a threatened species permit applied for at a later stage if threatened flora will be "knowingly taken". Whether the development permit refers to this requirement directly or indirectly (e.g. in general terms only) or in fact does not make mention of it at all, the term "knowingly" effectively requires the person taking action that may affect threatened species to do so under a Section 51 permit. Note, however, the caveats above in terms of the "risk" of non-compatibility between a planning permit and a threatened species permit. To my knowledge, NRE Tas does not have the authority to direct West Tamar Council in terms of something such as the specific design of a planning application, and West Tamar Council is not delegated authority to issue permits pursuant to the Tasmanian *Threatened Species Protection Act 1995*, hence the need for a cooperative and collaborative approach.

Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*

Under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* an action will require approval from the minister if the action has, will have, or is likely to have, a significant impact on a matter of national environmental significance.

Matters of national environmental significance considered under the EPBCA include:

- listed threatened species and communities
- listed migratory species;
- Ramsar wetlands of international importance;
- Commonwealth marine environment;
- world heritage properties;
- national heritage places;
- the Great Barrier Reef Marine Park;
- nuclear actions; and
- a water resource, in relation to coal seam gas development and large coal mining development.

The relevant Commonwealth agency provides a policy statement titled *Matters of National Environmental Significance: Significant Impact Guidelines 1.1* (CofA 2013, herein the *Guidelines*), which provides overarching guidance on determining whether an action is likely to have a significant impact on a matter protected under the EPBCA.

The *Guidelines* define a **significant impact** as:

> *"…an impact which is important, notable, or of consequence, having regard to its context or intensity. Whether or not an action is likely to have a significant impact depends upon the sensitivity, value, and quality of the environment which is impacted, and upon the intensity, duration, magnitude and geographic extent of the impacts"*

and note that:

> *"…all of these factors [need to be considered] when determining whether an action is likely to have a significant impact on matters of national environmental significance".*

The *Guidelines* provide advice on when a significant impact may be likely:

> *"To be 'likely', it is not necessary for a significant impact to have a greater than 50% chance of happening; it is sufficient if a significant impact on the environment is a real or not remote chance or possibility.*
>
> *If there is scientific uncertainty about the impacts of your action and potential impacts are serious or irreversible, the precautionary principle is applicable. Accordingly, a lack of scientific certainty about the potential impacts of an action will not itself justify a decision that the action is not likely to have a significant impact on the environment".*

The *Guidelines* provide a set of Significant Impact Criteria (CofA 2013), which are "intended to assist…in determining whether the impacts of [the] proposed action on any matter of national environmental significance are likely to be significant impacts". It is noted that the criteria are "intended to provide general guidance on the types of actions that will require approval and the types of actions that will not require approval…[and]…not intended to be exhaustive or definitive".

When considering whether or not an action is likely to have a significant impact on a matter of national environmental significance it is relevant to consider all adverse impacts which result from the action, including indirect and offsite impacts. Indirect and offsite impacts include:

a. 'downstream' or 'downwind' impacts, such as impacts on wetlands or ocean reefs from sediment, fertilisers or chemicals which are washed or discharged into river systems;

b. 'upstream impacts' such as impacts associated with the extraction of raw materials and other inputs which are used to undertake the action; and

c. 'facilitated impacts' which result from further actions (including actions by third parties) which are made possible or facilitated by the action.

For example, the construction of a dam for irrigation water facilitates the use of that water by irrigators with associated impacts. Likewise, the construction of basic infrastructure in a previously undeveloped area may, in certain circumstances, facilitate the urban or commercial development of that area.

Consideration should be given to all adverse impacts that could reasonably be predicted to follow from the action, whether these impacts are within the control of the person proposing to take the action or not. Indirect impacts will be relevant where they are sufficiently close to the proposed action to be said to be a consequence of the action, and they can reasonably be imputed to be within the contemplation of the person proposing to take the action.

Listed ecological communities

The subject title does not support any such communities.

Threatened flora

The subject title does not support any such species, nor potential habitat of such species (except in a very general sense), and site survey has not resulted in the detection of such species.

Threatened fauna

The study area may support populations of threatened fauna listed on the Act, most notably the Tasmanian devil, spotted-tailed quoll, eastern quoll, eastern barred bandicoot and blue-winged

parrot, although no specific evidence such as scats, diggings or dens were noted. Note that the study area is within the range of several other species listed on the Act but it is unlikely that the proposal will result in a significant impact on these species (this includes wide-ranging species such as the wedge-tailed eagle and masked owl). On an initial review of the *Guidelines*, it seems unlikely that the proposal as indicated will result in the need for a referral in relation to these species.

The *Guidelines* indicate that "an action is likely to have a significant impact on a critically endangered or endangered species [noting that these criteria effectively cover vulnerable species] if there is a real chance or possibility that it will:

- lead to a long-term decrease in the size of a population [unlikely at the scale of the proposed development];
- reduce the area of occupancy of the species [probably unlikely overall, although there will be a measurable, albeit small, loss of potential habitat – however, the species would still be able to utilise the broader area of the title(s) such that the area of occupancy may not be technically reduced per se];
- fragment an existing population into two or more populations [further modification of what is already highly modified habitat is hardly likely to fragment any populations in any meaningful manner];
- adversely affect habitat critical to the survival of a species [no such critical habitat has been identified as present];
- disrupt the breeding cycle of a population [unlikely at the scale of proposed works and in the context of surrounding land uses];
- modify, destroy, remove, isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline [probably unlikely – see previous criteria];
- result in invasive species that are harmful to a critically endangered species becoming established in the critically endangered species' habitat [unlikely];
- introduce disease that may cause the species to decline [unlikely]; or
- interfere with the recovery of the species [see previous response].

With respect to the aforementioned species, it is difficult to anticipate a scenario in which a referral to the relevant Commonwealth agency would be become necessary at the scale of the proposed activities.

Tasmanian *Forest Practices Act 1985* and associated *Forest Practices Regulations 2017*

The *Regulations* provide the following relevant circumstances in which a Forest Practices Plan is not required.

> 4. Circumstances in which forest practices plan, &c., not required
>
> For the purpose of section 17(6) of the Act, the following circumstances are prescribed:
>
> (a) the harvesting of timber or the clearing of trees, with the consent of the owner of the land, if the land is not vulnerable land and –
>
> (i) the volume of timber harvested or trees cleared is less than 100 tonnes for each area of applicable land per year; or
>
> (ii) the total area of land on which the harvesting or clearing occurs is less than one hectare for each area of applicable land per year –
>
> whichever is the lesser;

(j) the harvesting of timber or the clearing of trees on any land, or the clearance and conversion of a threatened native vegetation community on any land, for the purpose of enabling –

(i) the construction of a building within the meaning of the *Land Use Planning and Approvals Act 1993* or of a group of such buildings; or

(ii) the carrying out of any associated development –

if the construction of the buildings or carrying out of the associated development is authorised by a permit issued under that Act.

On this basis, a proposal subject to a planning permit issued pursuant to the Tasmanian *Land Use Planning and Approvals Act 1993* (i.e. under the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule*) should not require a Forest Practices Plan.

Tasmanian *Nature Conservation Act 2002*

Schedule 3A of the Act lists vegetation types classified as threatened within Tasmania. The title supports no such vegetation types.

Tasmanian *Weed Management Act 1999* (*Biosecurity Act 2019*)

No plant species classified as declared weeds within the meaning of the Tasmanian *Biosecurity Act 2019* (*Biosecurity Regulations 2022*) were detected from the study area, such that the Act has limited direct application.

Owner-occupation is considered the most appropriate long-term management option, where vigilance and immediate control are practical, with reference to the *General Biosecurity Duty* under the Tasmanian *Biosecurity Act 2019* (https://nre.tas.gov.au/biosecurity-tasmania/general-biosecurity-duty-(gbd).

In this case, provided that the above recommendations are adhered to, a stand-alone weed management plan should not be required.

Tasmanian *Land Use Planning and Approvals Act 1993*

The applicable planning scheme for the study area is the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule*. Note that the following is my interpretation of the provisions of the *Scheme* and may not necessarily represent the views of West Tamar Council. The following does not constitute legal advice. It is recommended that formal advice be sought from the relevant agency prior to acting on any aspect of this statement.

The applicable planning scheme for the study area is the *Tasmanian Planning Scheme – West Tamar*. The study area is zoned as Low Density Residential (Figure 5) under the *Scheme* and partly subject to the Priority Vegetation Area overlay (Figure 6).

Below I address the various relevant provisions of the *Scheme* that relate to the management of values considered in the preceding report, with the emphasis on addressing the intent and specifics of the Natural Assets Code.

The Purpose of the Natural Assets Code is stated as:

C7.0 Natural Assets Code

C7.1 Code Purpose

The purpose of the Natural Assets Code is:

C7.1.1 To minimise impacts on water quality, natural assets including native riparian vegetation, river condition and the natural ecological function of watercourses, wetlands and lakes.

C7.1.2 To minimise impacts on coastal and foreshore assets, native littoral vegetation, natural coastal processes and the natural ecological function of the coast.

C7.1.3 To protect vulnerable coastal areas to enable natural processes to continue to occur, including the landward transgression of sand dunes, wetlands, saltmarshes and other sensitive coastal habitats due to sea-level rise.

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.

Of the purpose statements, C7.1.4 is of greatest relevance to the present project with respect to the findings of this assessment and report, noting that only some of the site is "priority vegetation" (the parts supporting threatened flora). I do not believe that C7.1.1, C7.1.2 or C7.1.3 are relevant. I also do not believe that C7.15 is relevant (see **FINDINGS *Threatened fauna*** for a detailed discussion of the concept of "significant habitat of threatened fauna").

The Code has the following application:

C7.2 Application of this Code

C7.2.1 This code applies to development on land within the following areas:

(a) a waterway and coastal protection area;

(b) a future coastal refugia area; and

(c) a priority vegetation area only if within the following zones:

(i) Rural Living Zone;

(ii) Rural Zone;

(iii) Landscape Conservation Zone;

(iv) Environmental Management Zone;

(v) Major Tourism Zone;

(vi) Utilities Zone;

(vii) Community Purpose Zone;

(viii) Recreation Zone;

(ix) Open Space Zone;

(x) Future Urban Zone;

(xi) Particular Purpose Zone; or

(xii) General Residential Zone or Low Density Residential Zone, only if an application for subdivision.

C7.2.2 This code does not apply to use.

That is, C7.2.1(c)(xii) is applicable because the application will be for subdivision. Note that future development would not be subject to the Natural Assets Code but may still be subject to Section

51 of the Tasmanian *Threatened Species Protection Act 1995* in relation to the presence of threatened flora.

"Priority vegetation" is defined as:

> "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.

Of the above elements, only clause (b) is considered relevant to the parts of the title that support populations of threatened flora. That said, broader areas than the sites with threatened flora remain subject to the Priority Vegetation Area overlay.

The Development Standards for Subdivision (C7.7), the relevant one being C7.7.2 Subdivision within a priority vegetation area.

The objective of C7.7.2 is stated as:

> That:
>
> (a) works associated with subdivision will not have an unnecessary or unacceptable impact on priority vegetation; and
>
> (b) future development likely to be facilitated by subdivision is unlikely to lead to an unnecessary or unacceptable impact on priority vegetation.

Unfortunately, terms such as "unnecessary", "unreasonable" and "unacceptable" are not provided with definitions or guidance within the *State Planning Provisions* so it falls to professional opinion to assess a proposal against these objectives, which are essentially addressed through the relevant acceptable solutions or performance criteria.

The Acceptable Solution of C7.7.2 is stated as:

> A1
>
> Each lot, or a lot proposed in a plan of subdivision, within a priority vegetation area must:
>
> (a) be for the purposes of creating separate lots for existing buildings;
>
> (b) be required for public use by the Crown, a council, or a State authority;
>
> (c) be required for the provision of Utilities;
>
> (d) be for the consolidation of a lot; or
>
> (e) not include any works (excluding boundary fencing), building area, bushfire hazard management area, services or vehicular access within a priority vegetation area.

Given that much of the site is subject to the Priority Vegetation Area including the areas required for elements listed under A1(e), satisfaction of A1 is not possible.

The Performance Criteria of C7.7.2 is stated as:

P1.1

Each lot, or a lot proposed in a plan of subdivision, within a priority vegetation area must be for:

(a) subdivision for an existing use on the site, provided any clearance is contained within the minimum area necessary to be cleared to provide adequate bushfire protection, as recommended by the Tasmanian Fire Service or an accredited person;

(b) subdivision for the construction of a single dwelling or an associated outbuilding;

(c) subdivision in the General Residential Zone or Low Density Residential Zone;

(d) use or development that will result in significant long term social and economic benefits and there is no feasible alternative location or design;

(e) subdivision involving clearance of native vegetation where it is demonstrated that on-going pre-existing management cannot ensure the survival of the priority vegetation and there is little potential for long-term persistence; or

(f) subdivision involving clearance of native vegetation that is of limited scale relative to the extent of priority vegetation on the site.

The application of P1.1 in relation to the findings means that the relevant provision is considered to be P1.1(c) in that the subdivision will be in the Low Density Residential Zone, noting that only one of the sub-clauses of P1.1 needs to be satisfied.

The Performance Criteria of C7.7.2 are stated as:

P1.2

Works association [sic] with subdivision within a priority vegetation area must minimise adverse impacts on priority vegetation, having regard to:

(a) the design and location of any works, future development likely to be facilitated by the subdivision, and any constraints such as topography or land hazards;

(b) any particular requirements for the works and future development likely to be facilitated by the subdivision;

(c) the need to minimise impacts resulting from bushfire hazard management measures through siting and fire-resistant design of any future habitable buildings;

(d) any mitigation measures implemented to minimise the residual impacts on priority vegetation;

(e) any on-site biodiversity offsets; and

(f) any existing cleared areas on the site.

There are two critical phrases in C7.7.2 P1., viz. "…must minimise adverse impacts…" and "…having regard to…".

The use of the term "minimises" contemplates some level of impact being acceptable, although the *Scheme* does not provide guidance on the concept of what may constitute an "adverse" impact such that this falls to professional opinion. In this case, the subdivision proposal as presently conceptualised should not result in the material loss of the key elements comprising the "priority vegetation" on the site (i.e. populations of threatened flora). That is, this would satisfy the key element of P1.2 viz. "must minimise adverse impacts on priority vegetation".

With respect to the phrase "…having regard to…", this is considered in the manner referred to in *S and S McElwaine and A Hamilton v West Tamar Council and Growth Developments Pty Ltd [2021] TASCAT 4 (17 November 2021)*, where TASCAT stated: "The requirement to 'have regard to' does not elevate P2.1(a) to (f) to mandatory requirements that the Proposal must satisfy. The Tribunal need only consider those subparagraphs in ascertaining whether the Proposal complies with Clause E8.6.1 P2.1". In this case, the key issue is in relation to the management of threatened flora. Any

proposal that takes appropriate account of these species to some reasonable level is likely to meet the intent of P1.2(a), (b), (c) or (d). This appears very practical to achieve.

Below I address the sub-clauses of P1.2 to further consider the management of the identified values.

(a) the design and location of any works, future development likely to be facilitated by the subdivision, and any constraints such as topography or land hazards;

In my opinion, this relates to access to the lots but also longer-term hazard management (which will take up part of the created lot but may not need to involve the key element of "priority vegetation i.e. threatened flora) and possibly fencing (unlikely to further impact on threatened flora sites as the fence is already present). That is, this sub-clause appears to be satisfied.

(b) any particular requirements for the works and future development likely to be facilitated by the subdivision;

Avoiding the populations of threatened flora appears to be practical such that this sub-clause is considered satisfied.

(c) the need to minimise impacts resulting from bushfire hazard management measures through siting and fire-resistant design of any future habitable buildings;

It is anticipated that BAL-19 is the usual standard required for new subdivisions and that this will result in a hazard management area that could be designed to avoid populations of threatened flora. That is, this sub-clause appears to be satisfied.

(d) any mitigation measures implemented to minimise the residual impacts on priority vegetation;

There is unlikely to be a "residual impact on priority vegetation". That is, this sub-clause appears to be satisfied.

(e) any on-site biodiversity offsets; and

Not applicable because there should be no residual impacts to offset.

(f) any existing cleared areas on the site.

There are "existing cleared areas on the site" including parts of what will become Lot 1 but also the modified vegetation on what will become Lot 2.

Recommendations

The recommendations provided below are a summary of those provided in relation to each of the natural values described in the main report. The main text of the report provides the relevant context for the recommendations.

<u>Vegetation types</u>

In general terms, minimising the extent of "clearance and conversion" and/or "disturbance" to native vegetation is recommended, recognising the relatively small size of the proposed lots, configuration and particular constraints (such as access, service and setback requirements) and future bushfire hazard management requirements.

Threatened flora

The proposed development site supports two plant species, namely *Brunonia australis* (blue pincushion) and *Caesia calliantha* (blue grasslily), listed as threatened (rare) on the Tasmanian *Threatened Species Protection Act 1995* (TSPA). Subdivision has taken account of the distribution of these species, and it should be practical to avoid all mapped occurrences with infrastructure such as boundary fencing and eventual house sites including bushfire hazard management zones.

Threatened fauna

Apart from the generic recommendation to minimise the extent of "clearance and conversion" and/or "disturbance" to native vegetation, specific management in relation to threatened fauna is not recommended.

Weed and disease management

Owner-occupation is considered the most appropriate longer-term management option, where vigilance and immediate control are practical, with reference to the *General Biosecurity Duty* under the Tasmanian *Biosecurity Act 2019* (https://nre.tas.gov.au/biosecurity-tasmania/general-biosecurity-duty-(gbd).

In this case, provided that the above recommendations are adhered to, a stand-alone weed management plan should not be required.

Legislative and policy implications

There will be a formal requirement for a permit under Section 51 of the Tasmanian *Threatened Species Protection Act 1995* (TSPA) to "take" individuals of *Brunonia australis* (blue pincushion) and *Caesia calliantha* (blue grasslily) if occurrences cannot be excluded (the present site plan achieves this). Refer to text on the complexities of the interplay between this Act and the planning approval process.

A formal referral to the relevant agency under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA) is not considered required.

Development will require a planning permit pursuant to the provisions of the applicable planning scheme. Satisfaction of P1.1 & P1.2 of C7.7.2 of the Natural Assets Code of the *Tasmanian Planning Scheme – West Tamar Local Provisions Schedule* appears possible without complex permit conditions.

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APPENDIX A. Vegetation community structure and composition

***Eucalyptus amygdalina* forest and woodland (TASVEG code: DAD)**
DAD has been mapped in three sections, with only a relatively narrow central band being described as "intact" relative to the patches north and south of this that have been described as "modified". The "intact" band has a relatively low canopy dominated by *Eucalyptus amygdalina* over variably dense tall shrubs, in turn over a largely grassy-graminoid-dominated ground layer. Apart from very minor weed occurrences (all being treated), this band of DAD is in relatively good condition, facilitated by the fencing to the north (and on its southwestern and northwestern boundaries), lack of active use of the modified area to the south, and the relatively extensive exposures of dolerite throughout (preventing active management such as slashing). South and northeast of the "intact" band of DAD, DAD is expressed in modified form. While the canopy is largely "intact", the shrub component is largely absent and the ground layer is now dominated by grass species (mixture of native and naturalised species). Absence of exposed dolerite in the southern area has allowed frequent slashing that has maintained the simple structure and composition. The presence of rock exposures and steeper slopes to the north have allowed some retention of understorey elements, albeit lacking in particular species such as *Brunonia australis* and *Caesia calliantha* recorded from the "intact" band of DAD. In some ways, the two patches of DAD marked as "modified" could be better mapped as part of a broader concept of FUR (although the lack of residential elements essentially precludes this) or improved pasture with native tree canopy (TASVEG code: FAC), the latter also essentially precluded because the site is not managed for primary production and both sites retain a relatively high proportion of native elements.

LHS. Modified forest to north (left part of image) with less modified forest to south (right of image)

RHS. Less modified forest in middle of title – note the exposed rock

Modified native vegetation in northern part of title


Views of modified southern part of title

Stratum	**Height (m)** **Cover (%)**	**Species** (underline = dominant, parentheses = sparse; + = present only)
description below for patch of DAD "intact"		
Trees	20 m 30%	*Eucalyptus amygdalina*
Tall shrubs	8-15 m 10%	*Allocasuarina littoralis, (Eucalyptus amygdalina), (Pomaderris apetala), (Bursaria spinosa), (Acacia mearnsii)*
Medium shrubs	1-3 m +	*Beyeria viscosa, Coprosma quadrifida*
Low shrubs	<1 m 5%	*Acrotriche serrulata, Epacris impressa, Pimelea humilis, Bossiaea prostrata, Indigofera australis, Hibbertia ericifolia, Euryomyrtus ramosissima*
Grasses	60%	*Austrostipa pubinodis, Tetrarrhena distichophylla, Microlaena stipoides, Poa rodwayi, Poa sieberiana, Poa labillardierei, Aira caryophyllea, Briza minor, Dactylis glomerata, Anthoxanthum odoratum, Rytidosperma pilosa, Cynosurus echinatus, Vulpia bromoides*
Graminoids	20%	*Lomandra longifolia, Lepidosperma laterale, (Caesia calliantha), (Arthropodium milleflorum), Bulbine bulbosa, Hypoxis hygrometrica, (Lepidosperma elatius), (Arthropodium strictum)*
Herbs	variable	*Brunonia australis, Gonocarpus tetragynus, Poranthera microphylla, Hypericum gramineum, Lagenophora stipitata, Dichondra repens, Goodenia lanata, Senecio phelleus, (Galium gaudichaudii), Wahlenbergia gymnoclada, Viola hederacea, Geranium potentilloides, Hypochaeris radicata, Lysimachia arvensis, Cirsium vulgare, Euchiton japonicus, Acaena novae-zelandiae, (Microtis unifolia), Ranunculus lappaceus, Oxalis perennans, Hydrocotyle hirta, Galium murale, Acaena echinata, Galium ciliare, Epilobium billardierianum, Drosera auriculata, Daucus glochidiatus*
Climbers	+	*Billardiera mutabilis, Comesperma volubile*

APPENDIX B. Vascular plant species recorded from study area

Botanical nomenclature follows *A Census of the Vascular Plants of Tasmania* (de Salas & Baker 2024), with family placement updated to reflect the nomenclatural changes recognised in the *Flora of Tasmania Online* (de Salas 2024+) and APG (2016); common nomenclature follows *The Little Book of Common Names of Tasmanian Plants* (Wapstra et al. 2005+, updated online at www.nre.tas.gov.au).

i = introduced/naturalised; e = endemic to Tasmania

TSPA = Tasmanian *Threatened Species Protection Act 1995* (status shown)

Table B1. Summary of vascular species recorded from study area

	ORDER			
STATUS	**DICOTYLEDONAE**	**MONOCOTYLEDONAE**	**GYMNOSPERMAE**	**PTERIDOPHYTA**
	39	20	-	-
e	1	-	-	-
i	5	8	-	-
Sum	**45**	**28**	**0**	**0**
TOTAL	**73**			

DICOTYLEDONAE			
	APIACEAE		
	Daucus glochidiatus	australian carrot	
	ARALIACEAE		
	Hydrocotyle hirta	hairy pennywort	
	ASTERACEAE		
i	*Cirsium vulgare*	spear thistle	
	Euchiton japonicus	common cottonleaf	
	Lagenophora stipitata	blue bottledaisy	
	Senecio phelleus	rock fireweed	
	Senecio quadridentatus	cotton fireweed	
	CAMPANULACEAE		
	Wahlenbergia gymnoclada	naked bluebell	
	CARYOPHYLLACEAE		
i	*Cerastium glomeratum*	sticky mouse-ear	
	CASUARINACEAE		
	Allocasuarina littoralis	black sheoak	
	CONVOLVULACEAE		
	Dichondra repens	kidneyweed	
	DILLENIACEAE		
	Hibbertia ericifolia subsp. *ericifolia*	variable guineaflower	
	DROSERACEAE		
	Drosera auriculata	tall sundew	
	ERICACEAE		
	Acrotriche serrulata	ants delight	
	Epacris impressa	common heath	
	EUPHORBIACEAE		
	Beyeria viscosa	pinkwood	
	FABACEAE		
	Acacia longifolia subsp. *longifolia*	sydney coast wattle	
	Acacia mearnsii	black wattle	
	Bossiaea prostrata	creeping bossia	
	Indigofera australis subsp. *australis*	native indigo	
	GENTIANACEAE		
i	*Centaurium erythraea*	common centaury	
	GERANIACEAE		
	Geranium potentilloides var. *potentilloides*	mountain cranesbill	
	GOODENIACEAE		
	Brunonia australis	blue pincushion	TSPA (rare)

	Goodenia lanata	trailing native-primrose	
	HALORAGACEAE		
	Gonocarpus tetragynus	common raspwort	
	HYPERICACEAE		
	Hypericum gramineum	small st johns-wort	
	MYRTACEAE		
e	*Eucalyptus amygdalina*	black peppermint	
	Euryomyrtus ramosissima	rosy heathmyrtle	
	ONAGRACEAE		
	Epilobium billardiereanum subsp*. billardiereanum*	robust willowherb	
	OXALIDACEAE		
	Oxalis perennans	grassland woodsorrel	
	PICRODENDRACEAE		
	Poranthera microphylla	small poranthera	
	PITTOSPORACEAE		
	Billardiera mutabilis	green appleberry	
	Bursaria spinosa subsp. *spinosa*	prickly box	
	POLYGALACEAE		
	Comesperma volubile	blue lovecreeper	
	PRIMULACEAE		
i	*Lysimachia arvensis*	scarlet pimpernel	
	RANUNCULACEAE		
	Ranunculus lappaceus	woodland buttercup	
	RHAMNACEAE		
	Pomaderris apetala subsp*. apetala*	common dogwood	
	ROSACEAE		
	Acaena echinata	spiny sheepsburr	
	Acaena novae-zelandiae	common buzzy	
	RUBIACEAE		
	Coprosma quadrifida	native currant	
	Galium ciliare subsp*. terminale*	multiflower hairy bedstraw	
	Galium gaudichaudii subsp*. parviflorum*	smallflower rough bedstraw	
i	*Galium murale*	small bedstraw	
	THYMELAEACEAE		
	Pimelea humilis	dwarf riceflower	
	VIOLACEAE		
	Viola hederacea	ivyleaf violet	
MONOCOTYLEDONAE			
	ASPARAGACEAE		
	Arthropodium milleflorum	pale vanilla-lily	
	Arthropodium strictum	chocolate lily	
	Lomandra longifolia	sagg	
	ASPHODELACEAE		
	Bulbine bulbosa	golden bulbine-lily	
	Caesia calliantha	blue grasslily	TSPA (rare)
	CYPERACEAE		
	Carex breviculmis	shortstem sedge	
	Lepidosperma elatius	tall swordsedge	
	Lepidosperma gunnii	narrow swordsedge	
	Lepidosperma laterale	variable swordsedge	
	HYPOXIDACEAE		
	Hypoxis hygrometrica var*. hygrometrica*	golden weatherglass	
	ORCHIDACEAE		
	Microtis unifolia	common onion-orchid	
	POACEAE		
i	*Aira caryophyllea* subsp*. caryophyllea*	silvery hairgrass	
i	*Anthoxanthum odoratum*	sweet vernalgrass	
	Austrostipa pubinodis	tall speargrass	
	Austrostipa stuposa	corkscrew speargrass	
i	*Briza minor*	lesser quaking-grass	
i	*Cynosurus echinatus*	rough dogstail	
i	*Dactylis glomerata*	cocksfoot	
	Dichelachne rara	common plumegrass	
i	*Holcus lanatus*	yorkshire fog	
	Microlaena stipoides var*. stipoides*	weeping grass	
i	*Poa annua*	winter grass	
	Poa labillardierei var*. labillardierei*	silver tussockgrass	
	Poa rodwayi	velvet tussockgrass	

	Poa sieberiana var. *sieberiana*	grey tussockgrass
	Rytidosperma pilosum	velvet wallabygrass
	Tetrarrhena distichophylla	hairy ricegrass
i	*Vulpia bromoides*	squirreltail fescue

APPENDIX C. Analysis of database records of threatened flora

Table C1 provides a listing of threatened flora from within 5,000 m of the study area (nominal buffer width usually used to discuss the potential of a particular study area to support various species listed in databases), with comments on whether potential habitat is present for the species, and possible reasons why a species was not recorded.

Table C1. Threatened flora records from within 5,000 m of boundary of study area

Species listed below are listed as rare (r), vulnerable (v), endangered (e), or extinct (x) on the Tasmanian *Threatened Species Protection Act 1995* (TSPA); vulnerable (VU), endangered (EN), critically endangered (CR) or extinct (EX) on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA). Information below is sourced from DNRET's *Natural Values Atlas* (DNRET 2024a) and other sources where indicated. Habitat descriptions are taken from FPA (2022) and TSS (2003+), except where otherwise indicated. Species marked with # are listed in CofA (2024).

Scientific name **Common name**	**Status** TSPA EPBCA	**Tasmanian habitat description (and distribution)**	**Comments on study area and database records**
Barbarea australis riverbed wintercress	e EN # only	*Barbarea australis* is a riparian species found near river margins, creek beds and along flood channels adjacent to the river. It favours the slower reaches, and has not been found on steeper sections of rivers. It often occurs in flood deposits of silt and gravel deposited as point bars and at the margins of base flows, or more occasionally between large cobbles on sites frequently disturbed by fluvial processes. Some of the sites are a considerable distance from the river, in flood channels scoured by previous flood action, exposing river pebbles.	Potential habitat absent (wholly atypical of all reported sites).
Bolboschoenus caldwellii sea clubsedge	r -	*Bolboschoenus caldwellii* is widespread in shallow, standing, sometimes brackish water, rooted in heavy black mud.	Potential habitat absent (wholly atypical of all reported sites).
Brunonia australis blue pincushion	r -	*Brunonia australis* typically occurs in grassy woodlands and dry sclerophyll forests dominated by *Eucalyptus amygdalina* or less commonly *E. viminalis* or *E. obliqua*. Some smaller populations are found in heathy and shrubby dry forests. The species occurs on well-drained flats and gentle slopes between 10-350 m a.s.l. It is usually found on sandy and gravelly alluvial soils, with a particular preference for ironstone gravels. Populations found on dolerite are usually small.	Species detected. Refer to **FINDINGS *Plant species*** Threatened flora for more details.
Caesia calliantha blue grasslily	r -	*Caesia calliantha* is found predominantly in the Midlands in grassland or grassy woodland including wattle and prickly box "scrub" (occasionally extending into forest, then usually dominated by *Eucalyptus viminalis* or *E. amygdalina*). It has also been recorded from grassy roadsides.	Species detected. Refer to **FINDINGS *Plant species*** Threatened flora for more details.

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on study area and database records
Caladenia caudata tailed spider-orchid	v VU # only	*Caladenia caudata* has highly variable habitat, which includes the central north: *Eucalyptus obliqua* heathy forest on low undulating hills; the northeast: *E. globulus* grassy/heathy coastal forest, *E. amygdalina* heathy woodland and forest, *Allocasuarina* woodland; and the southeast: *E. amygdalina* forest and woodland on sandstone, coastal *E. viminalis* forest on deep sands. Substrates vary from dolerite to sandstone to granite, with soils ranging from deep windblown sands, sands derived from sandstone and well-developed clay loams developed from dolerite. A high degree of insolation is typical of many sites.	Potential habitat absent (wholly atypical of all reported sites).
Calystegia sepium subsp. *sepium* swamp bindweed	r -	*Calystegia sepium* has been recorded from riverbanks and the margins of forests in the north of the State around the Tamar region, where it mainly occurs in *Melaleuca ericifolia* swamp forest and amongst *Phragmites australis* swampland.	Potential habitat absent (wholly atypical of all reported sites).
Chiloglottis trapeziformis broadlip bird-orchid	e -	*Chiloglottis trapeziformis* is known from near Wynyard on sandy soil in damp sclerophyll forest. There is a historical record from dry open forest near Legana. It has also been recorded from *Leptospermum* (teatree) and *Allocasuarina* (sheoak) scrub on sandy humus overlying granite on Great Dog Island (Furneaux group). Recent sites are in grassy *Eucalyptus amygdalina* forest on dolerite/Cainozoic deposits.	Potential habitat present. Species not detected. Survey did not coincide with peak flowering period (Wapstra 2018) but leaves (or post-fertilised plants) would still have been detectable.
Dianella amoena grassland flaxlily	r EN #	*Dianella amoena* occurs mainly in the northern and southern Midlands, where it grows in native grasslands and grassy woodlands.	Potential habitat present, although the site is somewhat outside the recognised range of the species. Species not detected (some seasonal constraint on detection and/or identification but survey coincided with peak flowering period).
Diuris palustris swamp doubletail	e -	*Diuris palustris* occurs in coastal areas in grassy open eucalypt forest, sedgy grassland and heathland with *Leptospermum* (teatree) and *Melaleuca* (paperbark) on poorly- to moderately-drained sandy peat and loams, usually in sites that are wet in winter.	Potential habitat absent (wholly atypical of all reported sites).
Epacris virgata twiggy heath	v EN # only	*Epacris virgata* is restricted to a small area of undulating terrain in the foothills of the Dazzler Range near Beaconsfield, where it occurs on serpentinite-derived soils in dry sclerophyll forest at an elevation of 40-80 m a.s.l.	Potential habitat absent (wholly atypical of all reported sites).
Glycine latrobeana clover glycine	v VU #	*Glycine latrobeana* occurs in a range of habitats, geologies and vegetation types. Soils are usually fertile but can be sandy when adjacent to or overlaying fertile soils. The species	Potential habitat marginally present, although the site is somewhat unusual in being on dolerite in this part of the State.

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on study area and database records
		mainly occurs on flats and undulating terrain over a wide geographical range, including near-coastal environments, the Midlands, and the Central Plateau. It mainly occurs in grassy/heathy forests and woodlands and native grasslands.	Species not detected (strong seasonal constraint on detection and/or identification but survey coincided with peak flowering period).
Lepidium hyssopifolium soft peppercress	e EN #	The native habitat of *Lepidium hyssopifolium* is the growth suppression zone beneath large trees in grassy woodlands and grasslands (e.g. over-mature black wattles and isolated eucalypts in rough pasture). *Lepidium hyssopifolium* is now found primarily under large exotic trees on roadsides and home yards on farms. It occurs in the eastern part of Tasmania between sea-level to 500 metres a.s.l. in dry, warm and fertile areas on flat ground on weakly acid to alkaline soils derived from a range of rock types. It can also occur on frequently slashed grassy/weedy roadside verges where shade trees are absent.	Potential habitat absent (except in a very general sense). Species not detected (no seasonal constraint on detection and/or identification).
Leucochrysum albicans subsp. *tricolor* grassland paperdaisy	e EN # only	*Leucochrysum albicans* subsp. *tricolor* occurs in the west and on the Central Plateau and the Midlands, mostly on basalt soils in open grassland. This species would have originally occupied *Eucalyptus pauciflora* woodland and tussock grassland, though most of this habitat is now converted to improved pasture or cropland.	Potential habitat absent (wholly atypical of all reported sites).
Lycopus australis australian gypsywort	e -	*Lycopus australis* occurs in moist shaded places including disturbed areas within *Melaleuca ericifolia* swamp forest, *Phragmites australis* reed beds, and rocky (dolerite) riverbeds fringed by riparian scrub.	Potential habitat absent (wholly atypical of all reported sites).
Paraprasophyllum [syn. *Prasophyllum*] *robustum* robust leek-orchid	e CR # only	*Paraprasophyllum robustum* is now known only from one small site in grassy and shrubby *Eucalyptus amygdalina* forest on well-drained brown loam derived from basalt. The species has a much wider historical distribution.	Potential habitat present. Species not detected. Survey coincided with peak flowering period (Wapstra 2018).
Pterostylis commutata midlands greenhood	e CR # only	*Pterostylis commutata* is restricted to Tasmania's Midlands, where it occurs in native grassland and *Eucalyptus pauciflora* grassy woodland on well-drained sandy soils and basalt loams.	Potential habitat absent (wholly atypical of all reported sites).
Pterostylis ziegeleri grassland greenhood	v VU # only	*Pterostylis ziegeleri* occurs in the State's south, east and north, with an outlying occurrence in the northwest. In coastal areas, the species occurs on the slopes of low stabilised sand dunes and in grassy dune swales, while in the Midlands it grows in native grassland or grassy woodland on well-drained clay loams derived from basalt.	Potential habitat absent (wholly atypical of all reported sites).

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on study area and database records
Rumex bidens mud dock	v -	*Rumex bidens* grows at the margins of lakes, swamps, and slow-moving rivers and streams, and may also occur in drainage channels.	Potential habitat absent (wholly atypical of all reported sites).
Senecio psilocarpus swamp fireweed	e VU #	*Senecio psilocarpus* is known from six widely scattered sites in the northern half of the State, including King and Flinders islands. It occurs in swampy habitats including broad valley floors associated with rivers, edges of farm dams amongst low-lying grazing/cropping ground, herb-rich native grassland in a broad swale between stable sand dunes, adjacent to wetlands in native grassland, herbaceous marshland and low-lying lagoon systems.	Potential habitat absent (wholly atypical of all reported sites).
Stylidium despectum small triggerplant	r -	*Stylidium despectum* has mainly been recorded from wet sandy heaths, moist depressions, soaks and hollows in near-coastal areas. It extends to similar habitat amongst forest and woodland in the Midlands.	Potential habitat absent (wholly atypical of all reported sites).
Veronica plebeia trailing speedwell	r -	*Veronica plebeia* typically occurs in dry to damp sclerophyll forest dominated by *Eucalyptus amygdalina* on dolerite or Tertiary sediments, but can also occur in *Eucalyptus ovata* grassy woodland/forest and *Melaleuca ericifolia* swamp forest.	Potential habitat present. Species not detected (no seasonal constraint on detection and/or identification).
Xanthorrhoea arenaria sand grasstree	v VU # only	*Xanthorrhoea arenaria* is restricted to coastal areas from Bridport in the northeast to Coles Bay on the East Coast, where it occurs in coastal sandy heathland, extending into heathy woodland and forest, mainly dominated by *Eucalyptus amygdalina.*	Potential habitat absent (wholly atypical of all reported sites). Site is well outside the recognised range.
Xanthorrhoea bracteata shiny grasstree	v EN # only	*Xanthorrhoea bracteata* is restricted to coastal areas from the Asbestos Range to Waterhouse Point in the northeast, where it occurs in sandy soils, often acid and waterlogged, in coastal heathland, extending into heathy woodland and forest, mainly dominated by *Eucalyptus amygdalina*.	Potential habitat absent (wholly atypical of all reported sites).
Xerochrysum palustre swamp everlasting	v VU # only	*Xerochrysum palustre* has a scattered distribution with populations in the northeast, east coast, Central Highlands and Midlands, all below about 700 m elevation. It occurs in wetlands, grassy to sedgy wet heathlands and extends to associated heathy *Eucalyptus ovata* woodlands. Sites are usually inundated for part of the year.	Potential habitat absent (wholly atypical of all reported sites).

APPENDIX D. Analysis of database records of threatened fauna

Table D1 provides a listing of threatened fauna from within 5,000 m of the study area (nominal buffer width usually used to discuss the potential of a particular study area to support various species listed in databases), with comments on whether potential habitat is present for the species, and possible reasons why a species was not recorded.

Table D1. Threatened fauna records from 5,000 m of boundary of study area

Species listed below are listed as rare (r), vulnerable (v), endangered (e), or extinct (x) on the Tasmanian *Threatened Species Protection Act 1995* (TSPA); vulnerable (VU), endangered (EN), critically endangered (CR) or extinct (EX) on the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBCA). Information below is sourced from the DNRET's *Natural Values Atlas* (DNRET 2024a), Bryant & Jackson (1999) and FPA (2024); marine, wholly pelagic and littoral species such as marine mammals, fish and offshore seabirds are excluded. Species marked with # are listed in CofA (2024). Note that the use of the descriptions of "potential habitat" and "significant habitat" as provided in FPA (2024) does not imply a direct relationship between these concepts and the concept of "significant habitat" as per C7.3.1 of the *State Planning Provisions*.

Scientific name **Common name**	**Status** TSPA EPBCA	**Tasmanian habitat description (and distribution)**	**Comments on project area and database records**
Accipiter [syn. *Tachyspiza*] *novaehollandiae* grey goshawk	e -	***Potential habitat*** is native forest with mature elements below 600 m altitude, particularly along watercourses. ***Significant habitat*** may be summarised as areas of wet forest, rainforest and damp forest patches in dry forest, with a relatively closed mature canopy, low stem density, and open understorey in close proximity to foraging habitat and a freshwater body (i.e. stream, river, lake, swamp, etc.).	***Potential habitat*** absent (except in a very general sense). ***Significant habitat*** absent. The species may occasionally utilise the greater title area as part of a home range and for foraging but small-scale development should not have a significant impact on this aspect of the life history of the species in the context of existing and surrounding land use. This species should not require further consideration.
Antipodia chaostola tax. *leucophaea* chaostola skipper	e EN #	***Potential habitat*** is dry forest and woodland supporting *Gahnia radula* (usually on sandstone and other sedimentary rock types) or *Gahnia microstachya* (usually on granite-based substrates).	***Potential habitat*** absent (neither *Gahnia radula* or *G. microstachya* were recorded). This species should not require further consideration.
Apus pacificus fork-tailed swift	- - #	Seasonal migrant (December through March) with habitat open skies over any habitat, more commonly associated with forested hills and mountains (McNab 2022).	***Potential habitat*** widespread but this is a species that flies at high altitude, very fast and highly mobile, feeding on the wing and virtually never perches (McNab 2022). This species should not require further consideration.
Aquila audax subsp. *fleayi* wedge-tailed eagle	e EN #	***Potential habitat*** comprises ***potential nesting habitat*** and ***potential foraging habitat***. ***Potential foraging habitat*** is a wide variety of forest (including areas subject to native forest silviculture) and non-forest habitats. ***Potential nesting habitat*** is tall eucalypt trees in large tracts (usually more than 10 ha) of eucalypt or mixed forest. Nest trees are usually amongst the largest in a locality. They are	***Potential foraging habitat*** widespread. ***Potential nesting habitat*** absent – site does not contain large trees suitable for nesting and is in a highly modified context. ***Significant habitat*** absent. The species may utilise the greater title area as part of a home range and for foraging but small-scale development should not have a significant impact on

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on project area and database records
		generally in sheltered positions on leeward slopes, between the lower and mid sections of a slope and with the top of the tree usually lower than the ground level of the top of the ridge, although in some parts of the State topographic shelter is not always a significant factor (e.g. parts of the northwest and Central Highlands). Nests are usually not constructed close to sources of disturbance and nests close to disturbance are less productive. ***Significant habitat*** is all native forest and native non-forest vegetation within 500 m or 1 km line-of-sight of known nest sites (where the nest tree is still present).	this aspect of the life history of the species. This species should not require further consideration.
Botaurus poiciloptilus Australasian bittern	- EN #	***Potential habitat*** is comprised of wetlands with tall dense vegetation, where it forages in still, shallow water up to 0.3 m deep, often at the edges of pools or waterways, or from platforms or mats of vegetation over deep water. It favours permanent and seasonal freshwater habitats, particularly those dominated by sedges, rushes and reeds (e.g. *Phragmites*, *Cyperus*, *Eleocharis*, *Juncus*, *Typha*, *Baumea*, *Bolboschoenus*) or cutting grass (Gahnia) growing over a muddy or peaty substrate (TSSC 2011).	***Potential habitat*** absent. This species should not require further consideration.
Bubulcus coromandus [syn. *B. ibis*, *Ardea ibis*] cattle egret	- - #	Seasonal migrant (April through October) with habitat agricultural lands, crops, dams, pastures, particularly those with cattle, mudflats and wetlands (McNab 2022).	***Potential habitat*** absent (except in a very general sense). This species should not require further consideration.
Catadromus lacordairei green-lined ground beetle	v -	***Potential habitat*** is open, grassy/sedgy, low altitude grasslands and woodlands associated with temporary and permanent wetlands and low-lying plains, flats and ephemeral drainages adjacent to rivers and streams. Key habitat elements that need to be present include sheltering sites such as patches of stones, coarse woody debris and/or cracking soils.	***Potential habitat*** absent (site lacks the habitat elements described). This species should not require further consideration.
Ceyx azureus subsp. *diemenensis* [syn. *Alcedo azurea* subsp. *diemenensis*] Tasmanian azure kingfisher	e EN #	***Potential habitat*** comprises potential foraging habitat and potential breeding habitat. ***Potential foraging habitat*** is primarily freshwater (occasionally estuarine) waterbodies such as large rivers and streams with well-developed overhanging vegetation suitable for perching and water deep enough for dive-feeding. ***Potential breeding habitat*** is usually steep banks of large rivers (a breeding site is a hole (burrow) drilled in the bank).	***Potential foraging habitat*** absent (no ephemeral or permanent watercourses present). ***Potential breeding habitat*** absent (as above). This species should not require further consideration.

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on project area and database records
Dasyurus maculatus subsp. *maculatus* spotted-tailed quoll	r VU #	***Potential habitat*** is coastal scrub, riparian areas, rainforest, wet forest, damp forest, dry forest and blackwood swamp forest (mature and regrowth), particularly where structurally complex and steep rocky areas are present, and includes remnant patches in cleared agricultural land. ***Significant habitat*** is all potential denning habitat within the core range of the species. ***Potential denning habitat*** for the spotted-tailed quoll includes 1) any forest remnant (>0.5 ha) in a cleared or plantation landscape that is structurally complex (high canopy, with dense understorey and ground vegetation cover), free from the risk of inundation, or 2) a rock outcrop, rock crevice, rock pile, burrow with a small entrance, hollow logs, large piles of coarse woody debris and caves.	***Potential habitat*** widespread. No evidence (e.g. scats) of the species was observed. The site provides effectively no potential denning habitat due to the lack of complexity on the forest floor with virtually no coarse woody debris, limited leaf/bark layer, only embedded rock outcrops (notably not with overhangs), and no wombat/rabbit burrows. No suspected den sites were noted. ***Significant habitat*** absent. The species may occasionally utilise the greater title area as part of a home range and for foraging but small-scale development should not have a significant impact on this aspect of the life history of the species in the context of existing and surrounding land use. This species should not require further consideration.
Dasyurus viverrinus eastern quoll	- EN #	***Potential habitat*** is a variety of habitats including rainforest, heathland, alpine areas and scrub. However, it seems to prefer dry forest and native grassland mosaics which are bounded by agricultural land.	***Potential habitat*** present. See under spotted-tailed quoll. This species should not require further consideration.
Galaxiella pusilla eastern dwarf galaxiid	v VU	***Potential habitat*** is slow-flowing and still waters such as swamps, shallow pools, lagoons, drains or backwaters of streams, often (but not always) with aquatic vegetation. It may also be found in temporary waters that dry up in summer for as long as 6-7 months, especially if burrowing crayfish burrows are present. Habitat may include forested swampy areas but does not include blackwood swamp forest. Juveniles congregate in groups at the water surface in pools free of vegetation. ***Significant habitat*** is all potential habitat and a 30 m streamside reserve within the core range.	***Potential habitat*** absent (no ephemeral or permanent watercourses present). Site is well outside the recognised range of the species (no records in the River Tamar system). ***Potential habitat*** absent (as above). This species should not require further consideration.
Gallinago hardwickii Lathams snipe	- VU #	Seasonal migrant that prefers brackish, fresh and saline habitats including lagoons, lakes, marshes, swamps, wet grasslands and paddocks and wetlands with tussockgrasses (McNab 2022).	***Potential habitat*** absent, except in the most general of senses. This species should not require further consideration.
Haliaeetus [syn. *Ichthyophaga*] *leucogaster* white-bellied sea-eagle	v -	***Potential habitat*** comprises ***potential nesting habitat*** and ***potential foraging habitat***. ***Potential foraging habitat*** is any large waterbody (including sea coasts, estuaries, wide rivers, lakes, impoundments and even large farm dams) supporting prey items (fish). ***Potential nesting habitat*** is tall eucalypt trees in large tracts (usually	***Potential foraging habitat*** widespread (although this would be mainly over open water). ***Potential nesting habitat*** absent – site does not contain large trees suitable for nesting and is in a highly modified context. ***Significant habitat*** absent.

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on project area and database records
		more than 10 ha) of eucalypt or mixed forest within 5 km of the coast (nearest coast including shores, bays, inlets and peninsulas), large rivers (class 1), lakes or complexes of large farm dams. Scattered trees along river banks or pasture land may also be used. ***Significant habitat*** is all native forest and native non-forest vegetation within 500 m or 1 km line-of-sight of known nest sites (where nest tree still present).	The species may utilise the greater title area as part of a home range and for foraging but small-scale development should not have a significant impact on this aspect of the life history of the species. This species should not require further consideration.
Hirundapus caudacutus white-throated needletail	- VU #	Seasonal migrant (December through March) with habitat open skies over any habitat, more commonly associated with forested hills and mountains (McNab 2022).	***Potential habitat*** widespread but this is a species that flies at high altitude, very fast and highly mobile, feeding on the wing and virtually never perches (McNab 2022). This species should not require further consideration.
Lathamus discolor swift parrot	e CR #	***Potential breeding habitat*** comprises ***potential foraging habitat*** and ***potential nesting habitat***, and is based on definitions of foraging and nesting trees (see Table A in swift parrot habitat assessment Technical Note). ***Potential foraging habitat*** comprises *Eucalyptus globulus* or *E. ovata* trees that are old enough to flower. In the Eastern Tiers, potential foraging habitat also includes *E. brookeriana* where it has the potential to contribute a substantial foraging resource. The occurrence of foraging-habitat can be remotely assessed, although only to a limited extent, by using mapping layers such as GlobMap (DPIPWE 2010). Due to the scale and inadequacies in current foraging-habitat mapping, potential foraging-habitat density within operational areas should be identified by ground-based surveys as per Table B in the swift parrot habitat assessment Technical Note. For management purposes potential nesting habitat is considered to comprise eucalypt forests that contain hollow-bearing trees. The FPA mature habitat availability map (see Technical Note 2) predicts the availability of hollow-bearing trees using the relevant definitions of habitat provided in Table C of the swift parrot habitat assessment Technical Note. The mature habitat availability map is designed to be used to make landscape-scale assessments and may not be reliable for stand-level assessments required during the development of a Forest Practices Plan. At the stand-level the availability and distribution of hollow-bearing trees across a coupe or	***Potential foraging habitat*** absent (neither foraging tree species is present). ***Potential nesting habitat*** absent (no hollow-bearing trees). ***Significant habitat*** absent. This species should not require further consideration.

Scientific name Common name	Status TSPA EPBCA	Tasmanian habitat description (and distribution)	Comments on project area and database records
		operation area is best determined from a ground-based assessment (see Table C in the swift parrot habitat assessment Technical Note). ***Significant habitat*** is all potential breeding habitat within the SE potential breeding range and the NW breeding areas.	
Limnodynastes peroni striped marsh frog	e -	***Potential habitat*** is natural and artificial coastal and near-coastal wetlands, lagoons, marshes, swamps and ponds (including dams), with permanent freshwater and abundant marginal, emergent and submerged aquatic vegetation. ***Significant habitat*** is still or very slow-flowing waterbodies, with at least some vegetation, and a lack of obvious pollutants (oils, chemicals, etc.).	***Potential habitat*** absent (site is highly atypical for this species and is outside the recognised very near-coastal range with no records in the River Tamar system). ***Significant habitat*** absent. This species should not require further consideration.
Litoria raniformis green and golden frog	v VU #	***Potential habitat*** is permanent and temporary waterbodies, usually with vegetation in or around them, including features such as natural lagoons, permanently or seasonally inundated swamps and wetlands, farm dams, irrigation channels, artificial water-holding sites such as old quarries, slow-flowing stretches of streams and rivers and drainage features. ***Significant habitat*** is still or very slow-flowing waterbodies, with at least some vegetation, and a lack of obvious pollutants (oils, chemicals, etc.).	***Potential habitat*** present in the form of a constructed pond with well-developed floating an emergent vegetation. This site has previously supported the species, as have smaller constructed ponds near the house (M. James pers. comm.). No evidence of the species was recorded on the day of assessment, which was ideal (warm, sunny). ***Significant habitat*** present. This species should not require further consideration because there is no proposal to impact on any potential habitat (all will be retained within the balance lot "as is").
Myiagra cyanoleuca satin flycatcher	- - #	Seasonal migrant (November through march) with habitat scrub, wet and dry sclerophyll forests, woodlands and creeklines (McNab 2022).	***Potential habitat*** present. This species should not require further consideration as small-scale development should not have a significant impact on the species in the context of existing and surrounding land use.
Neophema chrysostoma blue-winged parrot	v VU #	Seasonal migrant (October through April) with habitat agricultural lands, crops, dams, paddocks, coastal scrub, open grassy woodlands, heathland and saltmarshes (McNab 2022). ***Potential habitat*** includes native eucalypt forest, native eucalypt woodlands, grasslands and wetlands (FPA 2024).	***Potential habitat*** present (as foraging habitat only – potential nesting habitat absent due to lack of hollow-bearing This species should not require further consideration as small-scale development should not have a significant impact on the species in the context of existing and surrounding land use.
Pasmaditta jungermanniae Cataract Gorge pinhead snail	v -	***Potential habitat*** is intact or disturbed native vegetation with extensive exposed rock faces (usually dolerite), usually greater than 2 m high (e.g. distinct outcrops/cliffs or several large boulders), with well-developed	***Potential habitat*** absent (dolerite is present but all exposures are shallow). This species should not require further consideration.

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		moss and/or lichen cover on rock faces and ledges (such sites often occur in more deeply incised drainage features or steeper slopes.	
Perameles gunnii subsp. *gunnii* eastern barred bandicoot	- VU #	***Potential habitat*** is open vegetation types including woodlands and open forests with a grassy understorey, native and exotic grasslands, particularly in landscapes with a mosaic of agricultural land and remnant bushland. ***Significant habitat*** is dense tussock grass-sagg-sedge swards, piles of coarse woody debris and denser patches of low shrubs (especially those that are densely branched close to the ground providing shelter) within the core range of the species.	***Potential habitat*** present. ***Significant habitat*** absent (site lacks the habitat complexity at ground level). The species may occasionally utilise the greater title area as part of a home range and for foraging but small-scale development should not have a significant impact on this aspect of the life history of the species in the context of existing and surrounding land use. This species should not require further consideration.
Prototroctes maraena Australian grayling	v VU #	***Potential habitat*** is all streams and rivers in their lower to middle reaches. Areas above permanent barriers (e.g. Prosser River dam, weirs) that prevent fish migration are not habitat.	***Potential habitat*** absent (no ephemeral or permanent watercourses present). This species should not require further consideration.
Pseudemoia pagenstecheri tussock skink	v -	***Potential habitat*** is grassland and grassy woodland (including rough pasture with paddock trees), generally with a greater than 20% cover of native grass species, especially where medium to tall tussocks are present.	***Potential habitat*** absent (there are no areas with greater than 20% cover of tussock-forming grass species present). This species should not require further consideration.
Pseudemoia rawlinsoni glossy grass skink	r -	***Potential habitat*** is wetlands and swampy sites (including grassy wetlands, teatree swamps and grassy sedgelands), and margins of such habitats..	***Potential habitat*** absent (no poorly-drained habitats present). This species should not require further consideration.
Sarcophilus harrisii Tasmanian devil	e EN #	***Potential habitat*** all terrestrial native habitats, forestry plantations and pasture. Devils require shelter (e.g. dense vegetation, hollow logs, burrows or caves) and hunting habitat (open understorey mixed with patches of dense vegetation) within their home range (427 km^2). ***Significant habitat*** is a patch of potential denning habitat where three or more entrances (large enough for a devil to pass through) may be found within 100 m of one another, and where no other potential denning habitat with three or more entrances may be found within a 1 km radius, being the approximate area of the smallest recorded devil home range. ***Potential denning habitat*** is areas of burrowable, well-drained soil, log piles or sheltered overhangs such as cliffs, rocky outcrops, knolls, caves and earth banks, free from risk of inundation and with at least one entrance through which a devil could pass.	***Potential habitat*** present. ***Significant habitat*** absent. See under spotted-tailed quoll. This species should not require further consideration.

Scientific name **Common name**	**Status** TSPA EPBCA	**Tasmanian habitat description (and distribution)**	**Comments on project area and database records**
Tyto novaehollandiae subsp. *castanops* masked owl	e VU #	***Potential habitat*** is all areas with trees with large hollows (≥15 cm entrance diameter). Remnants and paddock trees (in any dry or wet forest type) in agricultural areas may constitute potential habitat. ***Significant habitat*** is any areas within the core range of native dry forest with trees over 100 cm dbh with large hollows (≥15 cm entrance diameter).	***Potential habitat*** absent (no large trees with large hollows). ***Significant habitat*** absent (as above). The species may occasionally utilise the greater title area as part of a home range and for foraging but small-scale development should not have a significant impact on this aspect of the life history of the species in the context of existing and surrounding land use. This species should not require further consideration.

APPENDIX E. DNRET's *Natural Values Atlas* report for study area

Appended as pdf file.

APPENDIX F. Forest Practices Authority's *Biodiversity Values Atlas* report for study area

Appended as pdf file.

APPENDIX G. CofA's *Protected Matters* report for study area

Appended as pdf file.

ATTACHMENTS

- .shp file of revised vegetation mapping
- .shp file of point locations of threatened flora