

**From:** [Amy Robertson](#)  
**To:** [KC Mail](#)  
**Subject:** Submission to consultation on incorporation of Biodiversity Offset Policy in KIPS2015  
**Date:** Monday, 27 February 2023 5:00:25 PM

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Dear General Manager,

I'd like to contribute a few opinions about the proposed inclusion of a Biodiversity Offset Policy in the Kingborough Interim Planning Scheme 2015 (and indeed, in any future Local Provisions Schedule in the Tasmanian Planning Scheme).

I understand and agree that it's a complex and sensitive area to work in, and applaud effort to clarify the decision-making process on biodiversity issues.

Essentially, this tool aims to manage risk around potential biodiversity loss due to LUPAA developments in Kingborough. Having worked in a decision-making space on similar matters, I offer some points for consideration by KC and TPC.

### **Decision-making delegation process and flexibility**

I read the Policy as being worded very 'tightly', which is useful as it enables more clarity for both decision-makers and community. However, I also believe that it's important to recognise that we're likely unable to predict all the scenarios the Policy will face, or how existing inputs will change through time.

In particular, climate change is likely to challenge existing norms and some innovation in responses will likely be useful to improve our community's adaptation and resilience. I'd like to see recognition of the potential value of innovation and research in the last point under Table 3, as a contribution that may offer additional value in an offset.

### **Offset security confidence**

There seems to be an assumption that offsets are less secure than pre-development vegetation, leading to a higher ratio for replacement. I'd like to see acknowledgement that where a regulated or accountable offset is implemented, the replacement ratio should be varied downwards to reflect the greater confidence in benefit.

Otherwise there's no incentive to 'do better' in implementing an offset - this potentially punishes the conscientious.

### **Potential habitat vs significant habitat**

It makes sense from a risk management point of view, that response is proportionate to hazard, and therefore that 'significant habitat' is prioritised for more intense compensation than 'potential habitat'.

In Table 3, potential TSP/EPBC Act species habitat is treated as Moderate priority with a replacement ration of 3:1. This is a very large impost for a relatively uncertain value - especially for example where Eastern Barred Bandicoot or Quoll habitat is widespread across most of Tasmania. This ranking equates the value of this potential habitat with that of significant habitat for rare TSP/EPBC Act species, where I believe these are of different actual biodiversity value.

I'd like to see this category shifted to 'Low value', since it most generally equates with "all other native vegetation communities" (and with some non-native vegetation communities such as plantations or pastures).

**Individual tree value ratings**

I'm concerned that individual trees are targetted with high or very high biodiversity value ratings, where typically the biodiversity value of trees will be higher when they exist more robustly in a stand with its additional ecological features.

There's risk that this part of the policy unduly emphasises the importance of single trees, where these are actually a less sustainable method of providing continuing biodiversity value.

I'm also concerned that some definitions here are very absolute - for example, tree diameter is not always reflective of hollow potential (eg. a Bruny Island wet forest regrowth tree from the '67 bushfires).

**Financial value**

The financial offset rate should differentiate between each category of biodiversity values, rather than lumping high and moderate biodiversity value together for \$13,650 per hectare.

Perhaps I'm misreading, but is there a financial offset option for low priority biodiversity? There should be (and differentiated from high/moderate).

I'd be willing to speak to this submission at TPC hearings, and may have further background I can offer on some points.

Kind regards,

Amy Robertson

Independent forester

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

Phone 0407 651 200 / Email [amyware@yahoo.com](mailto:amyware@yahoo.com) / Mailing PO Box 177 Geeveston TAS 7116

UN Intergovernmental Panel on Climate Change (IPCC): "a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks while producing timber, fibre, or energy, generates the largest sustained benefit to mitigate climate change."

**From:** [Amy Robertson](#)  
**To:** [KC Mail](#)  
**Subject:** Fw: Submission to consultation on incorporation of Biodiversity Offset Policy in KIPS2015  
**Date:** Monday, 27 February 2023 5:32:23 PM  
**Attachments:** [KC\\_BiodiversitySubmission.docx](#)

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Past the deadline for submissions, but I'm hoping you'll accept one more point. Have also presented these as a standalone document (attached).

### **Systematic fairness**

It's also occurred to me that there's a significant discrepancy between the likely cost to a developer, for an application to clear trees via Kingborough's LUPAA system and the state's Forest Practices System.

For example, current FPP fees to clear native forest start from \$872.10 (which covers up to 17ha), much less than KC's proposed \$13,650.

I don't think it's useful to set up a system where the state's Forest Practices System is handballed a stream of land- or tree-clearing applications because it's cheaper than a particular local council's system. And I understand that there's a provision where FPPs are not exempt from LUPAA where they cover development - but prescribing future land use (or non-use) is also not a role for an FPP. Council should consider whether encouraging participation in its system is also a priority, and how it might do that - without just applying punitive measures.

Kind regards,  
Amy

----- Forwarded message -----

**From:** Amy Robertson <amyware@yahoo.com>  
**To:** KC Mail <kc@kingborough.tas.gov.au>  
**Sent:** Monday, 27 February 2023 at 04:00:16 pm GMT+10  
**Subject:** Submission to consultation on incorporation of Biodiversity Offset Policy in KIPS2015

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27/2/2023

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