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8 October 2025

CEO
Kingborough Council
15 Channel Hwy
Kingston TAS 7050

RE: DA-2024-260 - impact on natural values of new sewer mains at Kingston Beach Golf Club, 1 Channel Highway, Kingston

Dear Sir,

I act for the proponent in addressing the potential impacts on natural values of a new sewer main and associated pump station at Kingston Beach Golf Club, for which retrospective approval is being sought.

The proponents received an RFI from Council dated 18 March 2025 and this letter will address the following clauses of that RFI:

- Clause 4 in relation to the Private Reserve status of the property,
- Clause 5 in relation to a Tree Plan,
- Clause 6 in relation to the provisions of the Environmental Management Zone,
- Clause 8 in relation to the provisions of the Biodiversity Code, and
- Clause 9 in relation to the provisions of the Waterway and Coastal Protection Code.

As only a very small area (~ 14 m^2) of native vegetation and one mature tree are impacted by the development, it is assumed that a full Natural Values Report will not be required and that the assessment in this letter will suffice.

The Kingston Beach Golf Club is +/- 45.8 ha in six titles located in the lower catchment of Browns River behind Kingston Beach. The Golf Club is zoned Recreation and is subject to two overlays under the planning scheme which aim to protect natural values:

- the whole site is subject to the Biodiversity Protection Area (BPA) overlay, and
- 40 m either side of the banks of Browns River is subject to the Waterway and Coastal Protection Area (WCPA) overlay.

The area where the new sewer line crosses Browns River is zoned Environmental Management and is subject to both the BPA and WCPA overlay.

The Golf Club clubrooms serviced by the new sewer infrastructure are in the central west of the property. The new sewer main runs from the carpark south of the clubrooms to the south and then to the west, passing first under Browns River and then under the Channel Highway before joining the existing sewer network in the vicinity of the junction between the Channel Highway and Browns Road (see Site Plan by Burbury Consulting on page 3). For the most part, excavation to lay the sewer main was through trenching but the section under Browns River was provided by drilling under the riverbed.

The area affected by the new sewer main and pump station is occupied mainly by exotic pasture and weeds, with a small area of remnant native vegetation containing large mature eucalypts located midway along the line on a steep bank directly south of the Channel Highway (see the site plan by Burbury Consulting at Figure 1).

1. Private Sanctuary status

In recent times (the last 20 years) the department (formerly DPIPWE and now NRE) has adopted the policy that Private Sanctuary or Private Nature Reserve status will only be afforded to properties which have a Conservation Covenant under the *Nature Conservation Act 2002* registered against title. Presumably this is why the Council have assumed in drafting the RFI that there is a 'covenant on title'. There is no such covenant on title.

Private Reserves and Private Nature Reserves have independent status under the Act (originally the *Parks and Wildlife Act 1970* and now the *Nature Conservation Act 2002*) and historically several private reserves have been declared which are not accompanied by a covenant on title and are not subject to a statutory Management Plan. The Private Sanctuary over the Kingston Beach Golf Club falls into this category.

This situation is unfortunate when it comes to meeting the objectives of the Private Sanctuary declaration. Under the Act, the Director of PWS is not the 'Management Authority' for Private Sanctuaries and the declaration by itself does not provide the power to impose any restrictions on the activities of the owner (hence the desirability of also having a restrictive covenant on title or a statutory Management Plan in place).

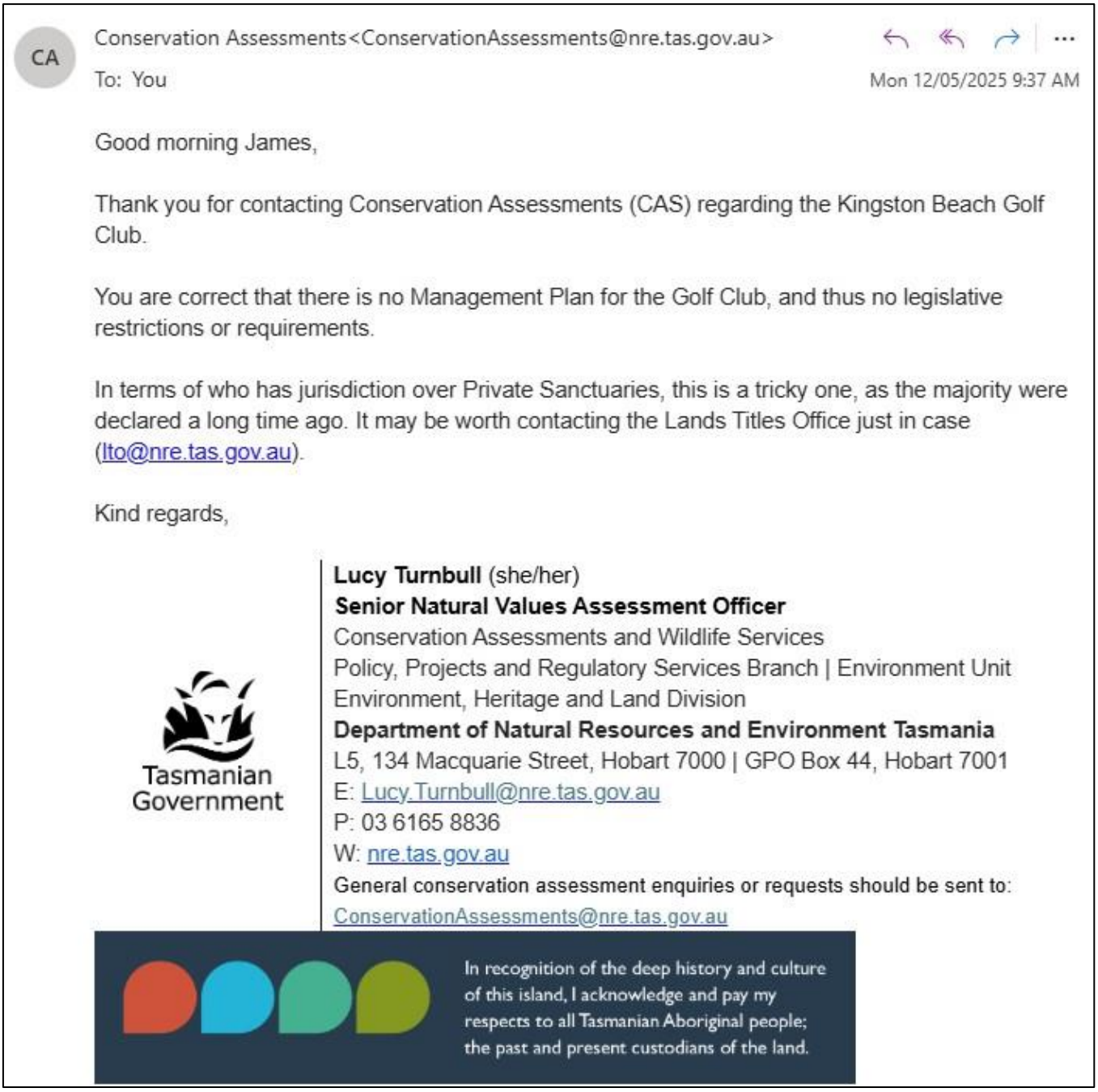
When the author began a 15-year period of working with the department to promote and facilitate Conservation Covenants in 1999, the initial priorities of the Private Land Conservation Program (PLCP) included securing covenants over various Private Sanctuaries and Private Nature Reserves around the State that were being degraded because there was no control over the owners' activities.

What does this mean for the Kingston Beach Golf Club Private Sanctuary?

Figure 1 – Site Plan by Burbury Consulting (August 2025)

There is no restrictive covenant registered against the titles to the property. As requested through the RFI, we have provided a copy of the original Proclamation and have made inquiries with NRE Conservation Assessment Section (CAS). CAS have confirmed that there is also no statutory Management Plan in place for the site and that the department has no power to enforce the objectives of the Sanctuary in relation to the owners' activities (see Figure 2).

Consequently, the Private Sanctuary status is a 'paper tiger' that does not provide the State the power to restrict the owners' management of the land.



CA

Conservation Assessments<ConservationAssessments@nre.tas.gov.au>

To: You

Mon 12/05/2025 9:37 AM

Good morning James,

Thank you for contacting Conservation Assessments (CAS) regarding the Kingston Beach Golf Club.

You are correct that there is no Management Plan for the Golf Club, and thus no legislative restrictions or requirements.

In terms of who has jurisdiction over Private Sanctuaries, this is a tricky one, as the majority were declared a long time ago. It may be worth contacting the Lands Titles Office just in case (lto@nre.tas.gov.au).

Kind regards,

Tasmanian Government

Lucy Turnbull (she/her)
Senior Natural Values Assessment Officer
Conservation Assessments and Wildlife Services
Policy, Projects and Regulatory Services Branch | Environment Unit
Environment, Heritage and Land Division
Department of Natural Resources and Environment Tasmania
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General conservation assessment enquiries or requests should be sent to:
ConservationAssessments@nre.tas.gov.au

In recognition of the deep history and culture of this island, I acknowledge and pay my respects to all Tasmanian Aboriginal people; the past and present custodians of the land.

Figure 2 – Advice received from CAS in NRE in relation to the Private Sanctuary status

2. *Native vegetation*

Vegetation across the property is predominantly mapped under TASVEG4.0 as extra-urban miscellaneous (FUM) and the site survey confirmed this to be the case. Nonetheless, the definition of native vegetation under the Scheme is very broad, and taken as read, means every individual native plant that has not been deliberately planted. As such, all individual native trees and shrubs within areas of FUM constitute native vegetation.

One area in the northwest of the property in the vicinity of the junction between the Channel Highway and Browns Road that is currently mapped as FUM has been re-mapped as weed infestation (FWU) due to dominance by recognised environmental weed species.

The remnant native vegetation midway along the new sewer line and located between the Channel Highway and the new sewer line is mapped under TASVEG4.0 as dry stringybark (*Eucalyptus obliqua*) forest and woodland (DOB).

It is difficult to map such small, isolated remnants in areas subject to significant disturbance, in this case +/- 3600 m^2 of remnant forest which is capturing runoff from a road that has been in place since 1845 and is also suffering significant edge effects. In mapping such a remnant, you would typically be looking to map contiguously with adjoining or nearby forest, but nearby forest across the highway has a completely different aspect.

In this case, a decision has been made to strike a balance between mapping for scale and context to larger areas of forest in the vicinity, and reflecting the current floristics at the site:

- the whole remnant has been mapped as dry blue gum (*E. globulus*) forest (DGL) which reflects the dominant eucalypt in one half of the remnant and one of the dominant vegetation communities in the vicinity occupying a similar aspect, and
- localised dominance of black gum (*E. ovata*) on a steep south-facing slope within the remnant is considered to result from artificially high surface water flows due to runoff from the road surface over an extended period.

It is understood that the original proposed alignment for the new sewer main passed through the remnant forest and would have impacted most of the mature trees within the remnant. The alignment was then re-designed to avoid the remnant and ultimately only a small area of the forest (~ 14 m^2) and one mature tree were impacted.

Vegetation in the area affected by the works for the new sewer line is illustrated in Figure 3.

Illustrative photos of the vegetation in the vicinity of the works for the new sewer line are provided is Section 7 on the impacts of the works.

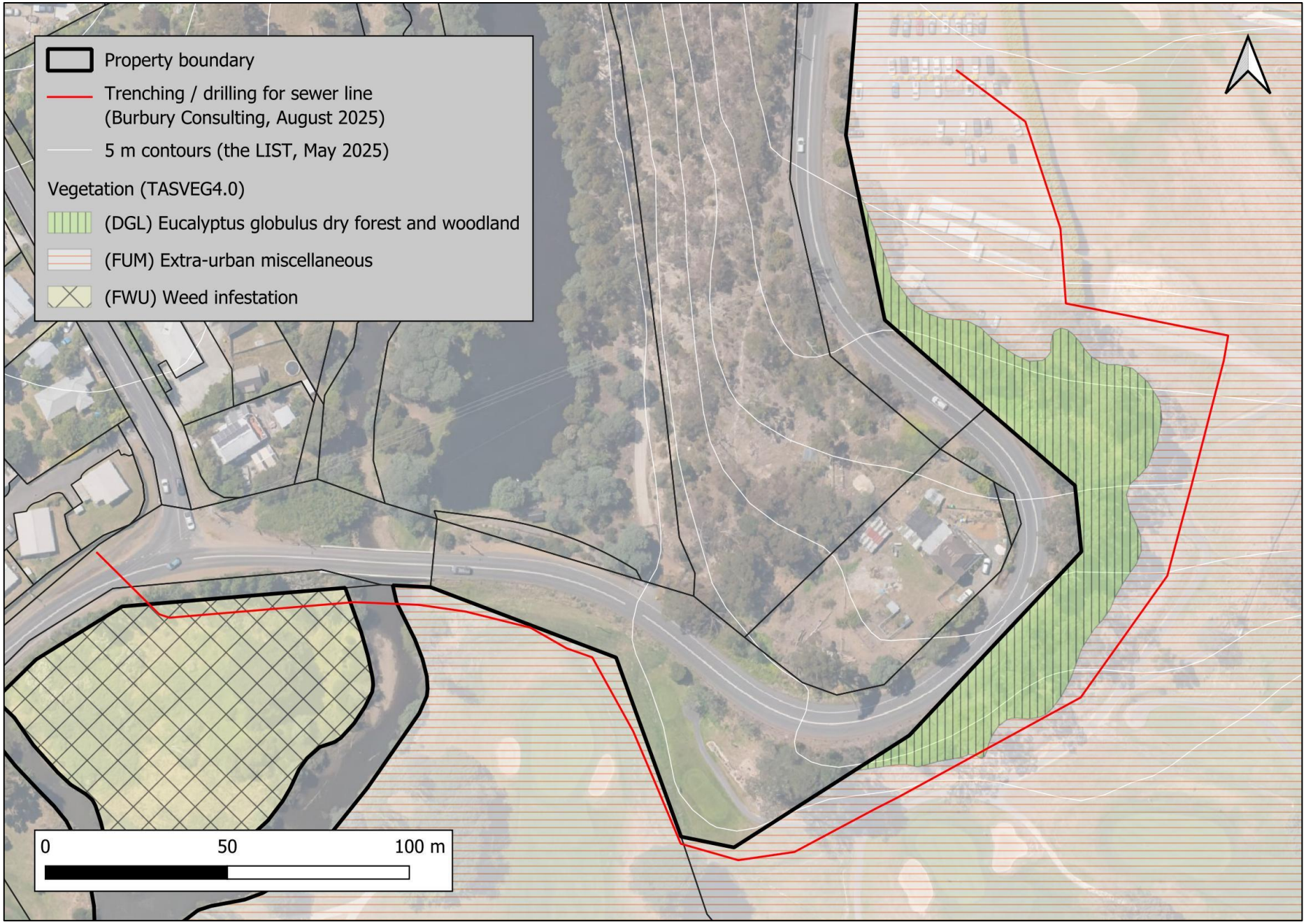

Figure 3 – Vegetation within the area impacted by the new sewer line

DGL forest

Remnant DGL forest has a mixed canopy dominated by blue gum (*E. globulus*) to the north and by black gum (eucalyptus ovata) to the south but also including white gums (*E. viminalis*) and one stringybark (*E. obliqua*). There are also several mature Monterey pines (*Pinus radiata*) within the canopy. There is a mid-storey in places comprised of silver wattles (*Acacia dealbata*), native cherries (*Exocarpos cuppresiformis*) or blackwood (*Acacia melanoxylon*).

The understorey is degraded by edge effects and features a mix of native and exotic species, with prominent species including native box (*Bursaria spinosa*), hawthorn (*Craetagus monogyna*), cheesewood (*Pittosporum bicolor*), blackberry (*Rubus fruticosus* aggregate), native currant (Coprosma quadrifida) and cape ivy (*Delairea odorata*). Groundcover within the DGL is a mosaic of grassy areas featuring a range of exotic grass species and dense patches of blackberry or cape ivy.

DGL forest and woodland is listed as a threatened community under Schedule 3A of the *Nature Conservation Act 2002* and constitutes a High Priority Biodiversity Value under Table E10.1 of the Scheme. The forest remnant at this site is a weedy, degraded example of this community.

Figure 4 – Remnant DGL forest with dense infestation of blackberry and cape ivy in the foreground

Figure 5 – Remnant DGL forest in area with local dominance of black gum

FWU

The area mapped as FWU was cleared at the same time as the works for the new sewer line. Based on the authors' prior familiarity with the site, piles of vegetative debris from recent clearing and existing vegetation at the site, it is evident this area was dominated by a range of recognised environmental weeds, particularly willow (*Salix sp.*), poplar (*Populus sp.*), blackberry ((*Rubus fruticosus* aggregate) and blue periwinkle (*Vinca major*).

Undoubtedly there are occasional native plants within this mapping unit, but the area is overwhelmingly occupied by exotic species.

Figure 6 - Pile of vegetation from clearing of FWU south of Browns River, comprised mostly of willows, poplar and blackberry

Figure 7 - blue periwinkle under mature Monterey pine in FWU south of Browns River

FUM

The area of the golf course proper is mapped as FUM. While this rea predominantly exotic, it does include native vegetation in the form of individual mature eucalypts (mostly white gums), individual native shrubs and patches of native trees and shrubs. No native vegetation within areas of FUM is affected by the proposal.

3. Threatened flora habitat

No threatened flora species listed under the Tasmanian *Threatened Species Protection Act 1995* (TTSPA) or under the Commonwealth *Environmental Protection and Biodiversity Act 1999* (EPBCA) was recorded during the rapid survey of the site. This is unsurprising given the limited native vegetation on site and the degraded condition of that vegetation.

Seven (7) threatened flora species have been recorded within 1 km of the site (Natural Values Atlas [NVA], May 2025) and a further nineteen (19) have been recorded within 5 km of the site. Based on habitat preferences and the management history and condition of the site, the small area of native vegetation impacted by the proposal does not provide suitable habitat for any of these species.

4. Threatened fauna habitat

No threatened fauna species listed under the TTSPA or under the EPBCA was recorded during the rapid survey of the site.

Eleven (11) terrestrial threatened fauna species have been recorded within 1 km of the site (NVA, March 2025) and a further four (4) have been recorded within 5 km of the site. The property provides suitable foraging habitat for of these species:

- grey goshawk (*Accipiter novaehollandiae*) [endangered* / not listed],
- tasmanian wedge-tailed eagle (*Aquila audax fleayi*) [endangered* / endangered #],
- Tasmanian azure kingfisher (*Ceyx azureus diemenensis*) [endangered* / endangered #],
- eastern quoll (*Dasyurus viverrinus*) [not listed * / endangered #],
- swift parrot (*Lathamus discolor*), [endangered* / critically endangered #],
- blue-winged parrot (*Neophema chrystostoma*), [not listed* / vulnerable #].
- eastern barred bandicoot (*Perameles gunnii*) [not listed* / vulnerable #],
- tasmanian devil (*Sarcophilus harrisii*) [endangered* / endangered #], and
- masked owl (*Tyto novaehollandiae*) [endangered* / vulnerable #].

(* TTSPA, # EPBCA)

All these species are relatively wide-ranging and may use the property for foraging and / or roosting. However, the small area of potential habitat impacted by this proposed development is unlikely on its own to constitute a significant area of habitat for any of these species due to scale, condition and nearby human disturbance.

The mature blue gums (*E. globulus*) and black gums (*E. ovata*) within the remnant DGL forest offer the most tangible threatened fauna habitat as they are likely to support foraging by swift parrots when in flower. The presence of over-mature trees with hollows in proximity to relat5ively large areas of swift parrot foraging habitat in the broader environment also means that there is potential for nesting habitat on the golf course should hollows of a suitable size be present.

The closest recorded raptor nest is a grey goshawk nest approximately 2 km to the northwest of the site along Browns River (NVA, May 2025).

5. Mature Trees

There are twelve (12) mature trees within 15 m of works for the new sewer line, including seven (7) trees meeting Council's working definition of a 'high conservation value tree' and four over-mature trees with hollows or the potential for hollow formation.

The route for the sewer line has been designed and located to avoid impacting most of the mature trees in the vicinity. However, one mature tree midway along the line and near one of the sealed paths through the golf course was removed (Tree # 11).

Some photos were taken of the tree which was removed (see Section 7 below on impacts). As these photos did not illustrate the foliage, it is not possible to be certain about the species of the tree, but based on available evidence it was probably either a white gum (*E. viminalis*) or a black gum (*E. ovata*), with a DBH of about 0.8 m.

Consistent with Council's Guidelines for a Tree Plan (v2.1, 5 April 2024), all trees with a diameter at breast height (DBH) of 250 mm or more within 15 m of works have been identified and located approximately using a Trimble DA2 DGPS unit, allowing accuracy to less than 1 m.

All trees recorded are mapped in Figure 8 on the following page and are listed in Table 1 on page 13. Table 1 also details:

- an individual identification number for each tree recorded,
- Tree Protection Zones (TPZs) for each tree, calculated in accordance with The Australian Standard Protection of Trees on Development Sites AS 4970-2009,
- whether the trees meet Council's working definition of a high conservation value tree (HCVT),
- the percentage of the TPZs of any trees which are impacted by proposed works, and
- whether the trees are proposed to be retained or removed.

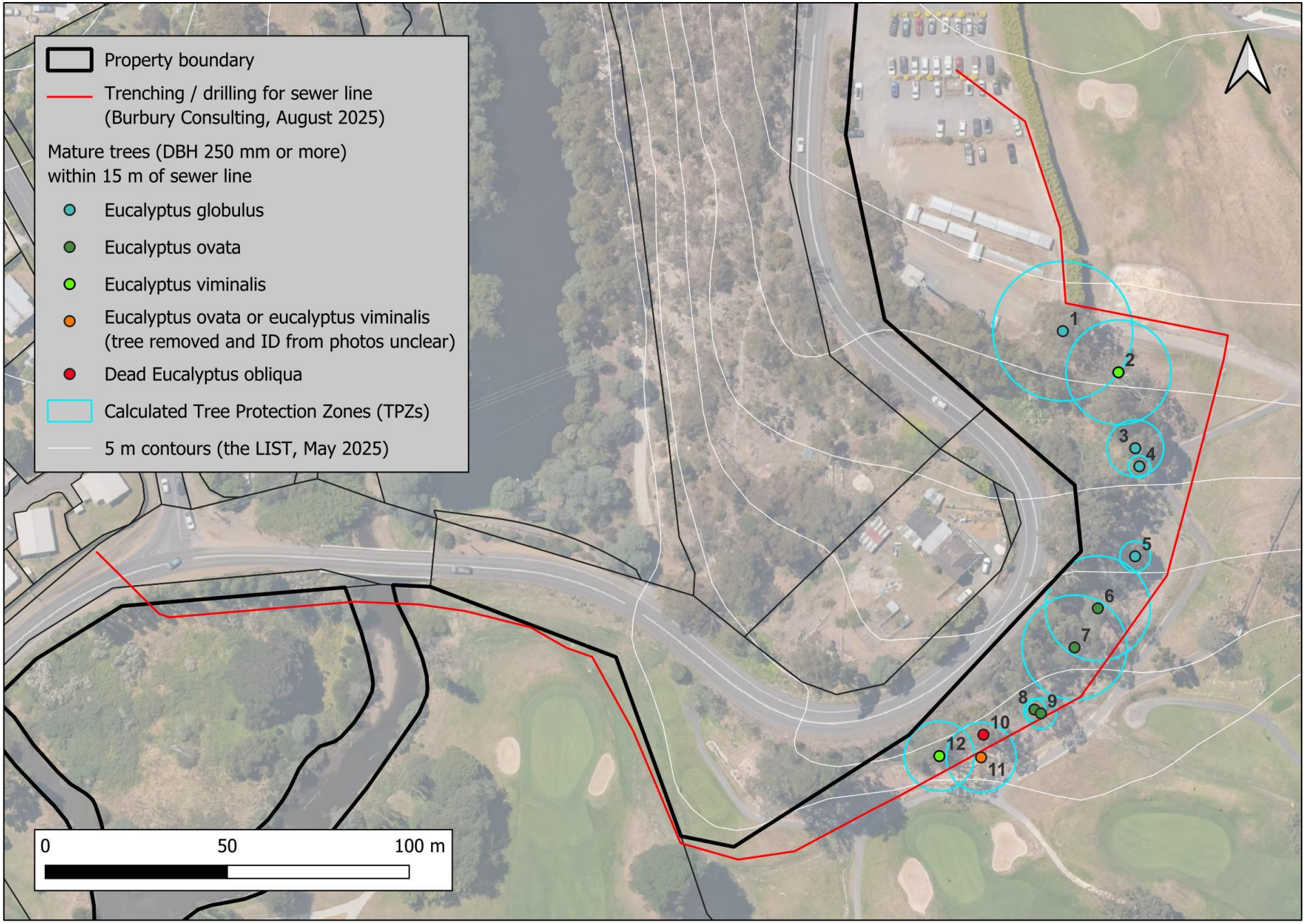

Figure 8 - Mature trees (DBH of 250 mm or more) within 15 m of works for the sewer line

Table 1 – Mature trees (DBH 250 mm or more) within 15 m of works for the new sewer line

Tree#	Species	DBH * (m)	TPZ # (m)	% TPZ impacted	HCVT (Y/N)	Action	Comments
1	*Eucalyptus globulus*	1.60	19.2	2.56	Y	Retain	
2	*Eucalyptus viminalis*	1.20	14.4	0.00	Y	Retain	Senescence and hollow formation
3	*Eucalyptus globulus*	0.65	7.8	0.00	Y	Retain	
4	*Eucalyptus globulus*	0.25	3.0	0.00	N	Retain	
5	*Eucalyptus globulus*	0.35	4.2	0.00	N	Retain	Quinfurcating
6	*Eucalyptus ovata*	1.20	14.4	3.20	Y	Retain	Senescence, large hollows and recently broken branch
7	*Eucalyptus ovata*	1.20	14.4	3.40	Y	Retain	Senescence and large hollows
8	*Eucalyptus ovata*	0.25	3.0	0.70	N	Retain	
9	*Eucalyptus ovata*	0.35	4.2	14.10	N	Retain	Trifurcating
10	*Dead Eucalyptus obliqua*				N	Retain	Dead
11	*Eucalyptus ovata* or *Eucalyptus viminalis*	+/- 0.80	9.6	6.60	Y	Removed	Not enough evidence from photos to confirm ID
12	*Eucalyptus viminalis*	0.80	9.6	5.70	Y	Retain	Senescence and hollow potential

* Rounded to the nearest 50 mm

\# TPZ = Tree Protection Zone.

Council's Guidelines for a Tree Plan (Kingborough Council, v2.1 April 2024) require that 'where the development proposes the retention of a (sic) high conservation value trees or priority species and the development encroaches into the tree protection zone of the trees, a report from a qualified arborist is also required.'

At this site, this requirement would be applicable to Tree numbers 1, 6, 7, 11 (already removed).

We request that Council waive this aspect of the guidelines for the following reasons:

- the unapproved works have been completed,
- except for Tree # 11 (already removed), the sewer line only impacts the outer edge of affected TPZs,
- all remaining trees in the vicinity of the works appear healthy and do not appear to have suffered any obvious negative consequences due to the works,
- given the works are complete, we don't believe that an Arborist report and associated advice or recommendations will add much value to the assessment of potential impacts on trees, and
- given that the nearby trees appear unaffected by works, we cannot imagine any additional mitigation works that an Arborist might recommend be undertaken at the site to protect the health or structural integrity of those trees which would not be entirely theoretical and speculative.

6. Weeds and pests

Several species listed as pest species / declared weeds under the *Tasmanian Biosecurity Regulations 2022*, as well as a range of other exotic species recognised as environmental weeds, were recorded in the remnant DGL forest and the area of FWU:

- boneseed (*Chrysanthemoides monilifera*), [declared weed and recognised environmental weed],
- Montpellier broom (*Genista monsplessulana*), [declared weed and recognised environmental weed],
- blackberry (*Rubus fruticosus* aggregate), [declared weed and recognised environmental weed],
- willow (*Salix sp.*), [declared weed and recognised environmental weed],
- cotoneasters (*Cotoneaster spp.*), [recognised environmental weed],

- Cape ivy (*Delairea odorata*), [recognised environmental weed],
- monterey pine (*Pinus radiata*), [recognised environmental weed],
- sweet p[pittosporum (*Pittosporum undulatum*), [recognised environmental weed],
- Briar rose (*Rosa rubiginosa*), [recognised environmental weed], and
- blue periwinkle (*Vinca major*), [recognised environmental weed].

Figure 9 – Understorey of remnant DGL forest smothered with cape ivy

Weed seeds and fungal diseases such as root-rot pathogen (*Phytophthora cinnamomi*) and chytrid frog disease (*Batrachochytrium dendrobatidis*) can easily be transported between sites on boots, equipment, vehicle tyres, introduced soil or other foreign materials.

Primary works associated with the new sewer line have already been completed but the owners and contractors should be aware in conducting any follow-up works that physical disturbance could potentially introduce weeds or disease or spread weeds and disease from the site to other areas. This risk can be minimised through appropriate vehicle and equipment hygiene and management controls. All vehicles and machinery entering the site should adhere to the Weed and Disease Planning and Hygiene Guidelines (NRE, 2015):

> https://nre.tas.gov.au/invasive-species/weeds/weed-hygiene/weed-and-disease-planning-and-hygiene-guidelines.

Key management controls to prevent the spread of weeds and disease include the following:

- all contractors engaged in development works should be required to thoroughly wash-down vehicles and equipment before coming on-site and after leaving the site,

- vehicles, equipment and materials should not be parked or stored within areas of native vegetation,
- during the conduct of works all vehicles should be restricted to driving and parking on hardstand areas and should not drive across areas of disturbed soil, and
- during and post-development, any areas of soil disturbance or introduced foreign materials (eg soil, compost or mulch) should be monitored regularly by the owners for the presence of any environmental weeds and any infestations should be treated as soon as practicable after discovery.

In addition, all gravel, fill and topsoil brought to the site should be sourced from certified weed free suppliers and quarries in accordance with Australian Standard AS4419 Soil for Landscaping and Garden Use to minimise the risk of weed seed being introduced.

7. Impact of the proposal on native vegetation

As previously noted, the definition of native vegetation under the Scheme is very broad and taken as read means every individual native plant that has not been deliberately planted.

Works for the new sewer line and associated pump station have occurred largely within areas of FUM and FWU and have mostly involved clearance of 'grassland' comprised of exotic grass species, as well as various exotic weed species within FWU to the south of Browns River. Inevitably some individual native plant species would have been impacted but it is not possible post-works to determine the extent of any such clearance.

The only direct evidence of impact on native vegetation because of works for the new sewer line is the clearance of a small area (~ 14 m^2) of DGL forest and one mature tree associated with this patch of vegetation. The DGL cleared constitutes a High Priority Biodiversity Value under Table E10.1 of the Scheme.

Some photos were taken of the tree which was removed (see Figures 10 – 12 on the following page). These photos do not illustrate the foliage, so it is not possible to be certain about the species of the tree. The broad shot in figure 5 is also too far away to be confident about understorey in the vicinity of the tree, but based on available evidence:

- the tree was probably either a white gum (*E. viminalis*) or a black gum (*E. ovata*), with a DBH estimated at about 0.8 m,
- the tree was rotten in the centre of the trunk, and
- there appear to have been native boxes (*Bursaria spinosa*) near the base of the tree, over a groundcover dominated by exotic grasses.

Illustrative photos (post-works) of all areas impacted by excavation for the new sewer line can be found in Figures 13 - 31 on pages 18 – 24.

Figure 10 - The large white gum / black gum within degraded DGL forest removed during works for the new sewer line (top right)

Figures 11 & 12 - Photos illustrating the rotten trunk of the felled tree

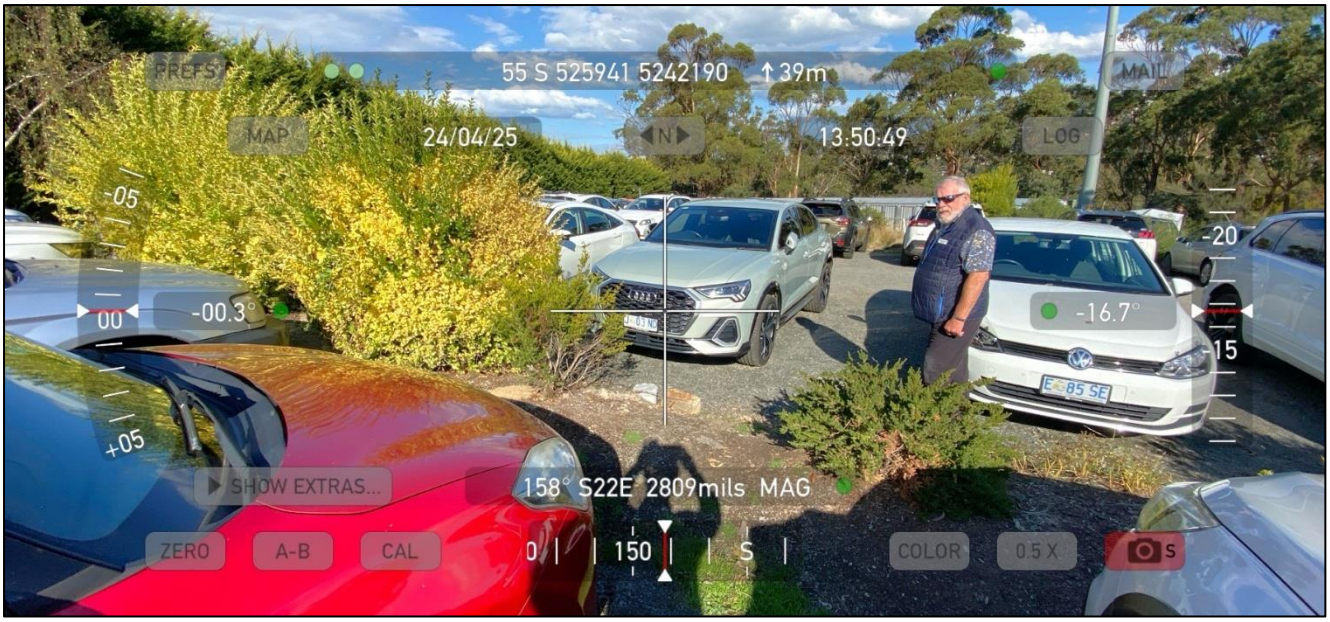

Figure 13 - Start of new sewer line in the carpark of the Golf Club

Figure 14 - Alignment of new sewer line beside the carpark of the Golf Club

Figure 15 - Alignment of new sewer line where it enters the golf course, with large blue gum at right

Figure 16 - Alignment of new sewer line where it heads south through the golf course

Figure 17 - Alignment of new sewer line where it crosses a path twice, with remnant DGL forest at right

Figure 18 - Alignment of new sewer line where it passes close to remnant DGL forest at left

Figure 19 - Alignment of new sewer line where it passes close to remnant DGL forest at left

Figure 20 - Alignment of new sewer line where Tree # 11 was removed (just right of centre)

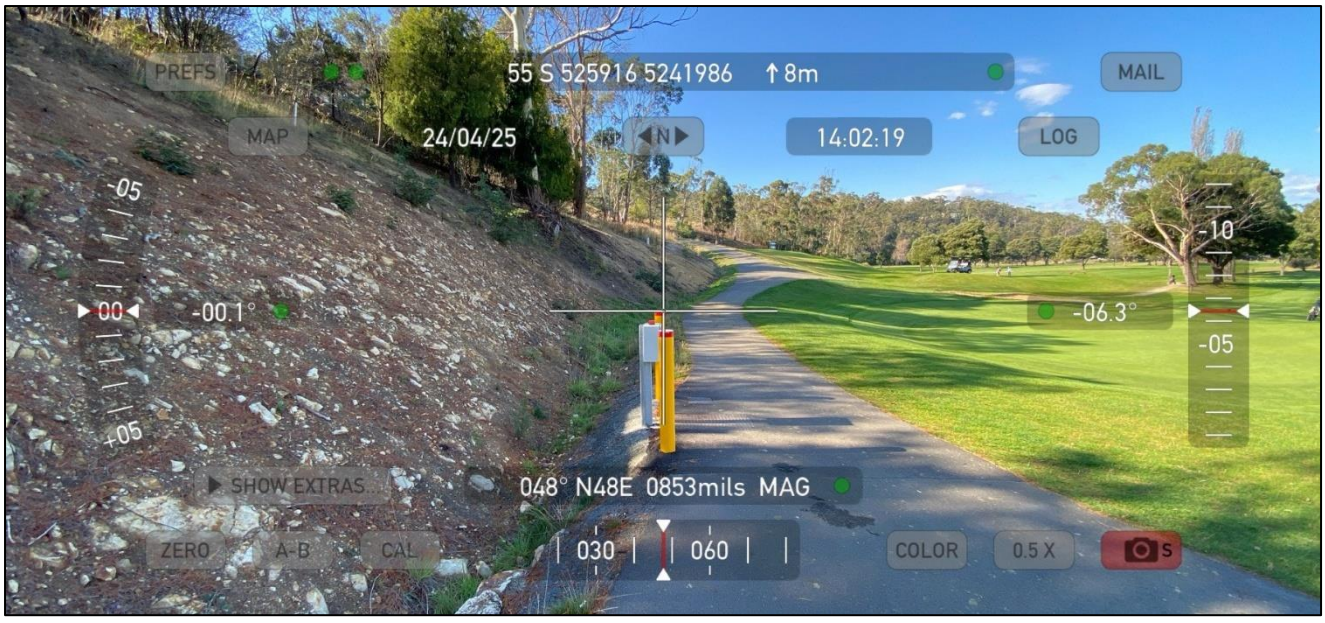

Figure 21 - Location of pump station on new sewer line

Figure 22 - Alignment of new sewer line heading south from the pump station

Figure 23 - Alignment of new sewer line across 'rough' south of the pump station (A)

Figure 24 - Alignment of new sewer line across 'rough' south of the pump station (B)

Figure 25 - Alignment of new sewer line across 'rough' on approach to Browns River

Figure 26 - Location where drilled line under Browns River emerged (approximately 20 m from rivers edge)

Figure 27 - Location of subterranean crossing of Browns River (approximately 1.5 m below the river bed)

Figure 28 - Location where drilled line under Browns River started (approximately 20 m from rivers edge)

Figure 29 - Alignment of new sewer line south of Browns River A

Figure 30 - Alignment of new sewer line south of Browns River B

Figure 31 - Alignment of new sewer line where it crosses the Channel Highway to join the pre-existing sewer network

8. Scheme provisions

29.0 Environmental Management Zone (Browns River crossing)

Clause 6. of the RFI requests a response to Clause 29.4.3 P3 (a) and (d).

The sewer line under Browns River was established by drilling. The following notes on the drilling have been provided by Pat Dwyer of DCS Civil.

- The river crossing was drilled by Peter Parker Drilling and is 100 mm PPE conduit.
- The river level was minimal at the time of drilling, so I asked them to drill 2 m below the water level, which puts the conduit 1500 mm below the floor of the river.
- The entry and exit holes for the drilling were 20 m away from the riverbank on each side.

29.4.3 Design

P3 Fill and excavation must satisfy all of the following:

(a) there is no adverse impact on natural values …

Response: a review of historic aerial imagery in Google Earth Pro indicates that the site of entry for the drill hole under the river was in an area of FWU and that the site of exit for the drill hole was in an area of FUM (‘rough’ behind one of the greens),

it is unlikely any native vegetation or other natural values were impacted by drilling for placement of the sewer line under the river.

(d) does not affect land stability on the lot or adjoining land.

Response: this is an engineering /geotechnical question which will be addressed by others.

E10.0 Biodiversity Code

E10.7.1 Building and Works

P1 Clearance and conversion or disturbance must satisfy the following:

If **high** priority biodiversity values (the small area of DGL forest and the mature white gum / black gum which have been cleared)

(i) development is designed and located to minimise impacts, having regard to constraints such as topography or land hazard and the particular requirements of the development,

Response: the route for the sewer line was designed to avoid most of the remnant DGL and mature trees,

the impact of the works on biodiversity values has been minimal, being limited to a small area of degraded DGL forest (~ 14 m^2) and one high conservation value tree which had a rotten core,

(ii) impacts resulting from future bushfire hazard management measures are minimised as far as reasonably practicable through appropriate siting and fire-resistant design of habitable buildings,

Response: n/a

(iii) high priority biodiversity values outside the area impacted by development works, the building area and the area likely impacted by future bushfire hazard management measures are retained and protected by appropriate mechanisms on the land title,

Response: requirements for ongoing protection and management of natural values across the whole property are best addressed in permit conditions.

(iv) residual adverse impacts on high priority biodiversity values not able to be avoided or satisfactorily mitigated are offset in accordance with the Guidelines for the use of Biodiversity Offsets in the local planning approval process, Southern Tasmanian Councils Authority, April 2013 and Kingborough Biodiversity Offset Policy 6.10, November 2016.

Response: the owners understand that offsets may be required and is satisfied with Council determining those offsets,

the details of any required offsets are best addressed in permit conditions.

(v) special circumstances exist,

Response: special circumstances exist in that the extent of removal of high priority biodiversity values on the site (one mature tree that may be a black gum) is insignificant relative to the extent of DGL forest in the vicinity and the number of mature white gums and black gums present across the Golf Course and adjoining properties.

(vi) clearance and conversion or disturbance will not substantially detract from the conservation status of the biodiversity value(s) in the vicinity of the development.

Response: the removal of ~ 14 m^2 of degraded DGL forest and one high conservation value tree will not substantially detract from the conservation status of the biodiversity value(s) in the vicinity of the development given the extent of DGL forest in the vicinity and the number of mature white gums and black gums present across the Golf Course and adjoining properties.

E11.0 Waterway and Coastal Protection Code

E11.7.1 Building and Works

P1 Building and works within a Waterway and Coastal Protection Area must satisfy all of the following:

a) avoid or mitigate impact on natural values,

Response: potential impacts on natural values within the riparian zone of Browns River and within the river itself have been avoided by drilling under the riverbed, with entry and exit points for the drilling setback 20 m from the rivers' edge,

a review of historic aerial imagery in Google Earth Pro indicates that the site of entry for the drill hole under the river was in an area of FWU and that the site of exit for the drill hole was in an area of FUM ('rough' behind one of the greens),

it is unlikely any native vegetation or other natural values were impacted by drilling for placement of the sewer line under the river,

given the sewer line lies ~1.5 m under the riverbed, it is unlikely that the works will result in any impact on in-stream natural values.

b) mitigate and manage adverse erosion, sedimentation and runoff impacts on natural values,

Response: risks of adverse erosion, sedimentation and runoff impacts on natural values have been minimised drilling under the riverbed, with entry and exit points for the drilling setback 20 m from the rivers' edge,

c) avoid or mitigate impacts on riparian or littoral vegetation,

Response: a review of historic aerial imagery in Google Earth Pro indicates that the site of entry for the drill hole under the river was in an area of FWU and that the site of exit for the drill hole was in an area of FUM ('rough' behind one of the greens),

it is unlikely any native riparian vegetation were impacted by drilling for placement of the sewer line under the river,

d) maintain natural streambank and streambed condition, (where it exists),

Response: any impacts on streambanks have been avoided by drilling under the riverbed, with entry and exit points for the drilling setback 20 m from the rivers' edge,

e) maintain in-stream natural habitat, such as fallen logs, bank overhangs, rocks and trailing vegetation,

Response: there has been no interference with or disturbance to in-stream natural habitat and none is proposed.

i) works are undertaken generally in accordance with Waterways and Wetlands Works Manual (DPIWE, 2003) and Tasmanian Coastal Works Manual (DPIPWE, December, 2010), and the unnecessary use of machinery within watercourses or wetlands is avoided.

Response: the approach to works within the WCPA overlay and the choice to drill under the riverbed has avoided the use of machinery and surface excavation in the riparian zone and the river itself and is consistent with the principles and practices outlined in the Waterways and Wetlands Works Manual (DPIWE, 2003).

9. Disclaimer

The advice and conclusions in this report rely upon the location of existing and proposed infrastructure relative to property boundaries and mature trees. In mapping the relative positions of these features, I have relied to some extent upon the plans and reports provided by Burbury Consulting and Leary, Cox and Cripps, and on rectified aerial imagery.

The accuracy of these reference sources cannot be guaranteed by this author. Where this plan indicates that vegetation and trees are to be retained, it is assumed that this can be achieved within the constraints of the site.

10. References and Data sources:

- theLIST 2025,
- Google Earth Pro (May 2025),
- Natural Values Atlas (NRE, 2025),
- Kingston Beach Golf Club, Connection to TasWater Sewer, Plans for Approval (Burbury Consulting, August 2024).

Please do not hesitate to contact me directly if you require any further information regarding this matter.

Yours sincerely,

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