

**EPBC 2022/09282 38-Lot Subdivision - Summary of Public Comments March 2026**

Member of Public	Submission received	Method	Issues Raised	Growth Development's Comments
Cameron Williams	16/03/2026	Email (1 of 2)	<ol style="list-style-type: none"> <li>1. Use of Valley View Drive as an access point to the proposed subdivision and concerns regarding increased traffic.</li> <li>2. Potential increase in wildlife mortality including Tasmanian devil, spotted-tailed quoll and eastern quoll.</li> <li>3. Scope of the ecological survey methods employed for the above-mentioned species.</li> </ol>	<ol style="list-style-type: none"> <li>1. No road access points to the subdivision development area to be established from Valley View Drive. Infrastructure (ie bollards) to be established by proponent to prevent vehicle access. Updates to PD text provided in Section 1.2, dot point 4 for clarification.</li> <li>2. Traffic-related wildlife mortality identified within the PD for Tasmanian devil (3.3.2, pg 48), spotted-tailed quoll (3.5.2, pg 56) and eastern quoll (3.4.2 pg 52). Avoidance and mitigation measures described for each species within Section 4 including roadkill mitigation actions. No further action required.</li> <li>3. Scope of ecological field surveys and habitat assessments described across NVA reports and PD report. Suitable methods for detection employed. No further action required.</li> </ol>
Cameron Williams	16/03/2026	Email (2 of 2)	<ol style="list-style-type: none"> <li>1. Increased vehicle movements on Valley View Drive during the subdivision construction period.</li> </ol>	<ol style="list-style-type: none"> <li>1. No increased vehicle movements on Valley View Drive proposed during construction. No further action required.</li> </ol>
Ann Hamilton	21/03/2026	Email	<ol style="list-style-type: none"> <li>1. Questioning the suitability of applying a Conservation Agreement between the landowner and DCCEEW and why not other mechanisms such as a conservation covenant under NCA or a Part V Agreement under LUPAA.</li> <li>2. Questioning whether a Conservation Agreement may have any inconsistencies with state legislation.</li> <li>3. What is the binding nature of the Conservation Agreement?</li> <li>4. Are there any recovery plan, threat abatement plan or wildfire conservation plans that may be inconsistent with the Conservation Agreement?</li> <li>5. What is the intended term of the Conservation Agreement?</li> <li>6. How the impact to the population of the residential lots of the subdivision (people, trail bikes, lawnmowers, radios, increased traffic) will be addressed?</li> </ol>	<ol style="list-style-type: none"> <li>1. After considering options for establishing a protection mechanism over the offset areas it was determined by Growth Developments that a Conservation Agreement was the preferred option. Consideration was also given to a Part V under LUPAA but this approach was deemed unsuitable by DCCEEW due to concerns regarding the robustness and enforceability of such agreements. A conservation covenant under the NCA was also considered but the site was thought to be generally unsuitable as an addition to the private land conservation program given its size, existing site management issues and overall modest contribution to threatened vegetation and threatened species. No further action required.</li> <li>2. The proponent has previously sought legal advice on the applicability of a Conservation Agreement to the offset land areas and is not aware of any direct conflict or inconsistencies with state legislation. No further action required.</li> <li>3. As we understand the operation of Conservation Agreements they are legally binding agreements between the landowner and the Commonwealth Government which remain binding from the period which they are commenced until such time as they are terminated by agreement between the parties. A minimum timeframe between 10-20 years is anticipated but requires confirmation with DCCEEW as the</li> </ol>

				<p>agreement and associated management plan are developed.</p> <p>4. We are not aware of any recovery plans, threat abatement plans or wildlife conservation plans (or associated management objectives) which may conflict with the proposed establishment of a Conservation Agreement to protect and management habitat for the Tasmanian devil and eastern quoll. No further action required</p> <p>5. We assume for the life of the permit or as agreed between the landowner and the Commonwealth Government. No further action required</p> <p>6. The increased traffic issue has been raised in earlier comments above (E3) and addressed appropriately through the PD. The remaining issues identified relate to projected future activities within the subdivision lots and have effectively be factored into the calculations of habitat loss for the respective MNES. Although the development envelopes within each of the lots have been described as complete habitat loss for these species, they are likely to retain periodic foraging value for both Tasmanian devil and eastern quoll. Additionally, these disturbance activities described as impacts from the residential lot areas are essentially day-time activities which will have negligible influence on almost exclusively nocturnal MNES (Tasmanian devil and eastern quoll). No further action required</p>
Alison Marshall	23/03/2026	Email with attachment	<ol style="list-style-type: none"> <li>1. General opposition to the development.</li> <li>2. Concerned about the term of the proposed Conservation Agreement potentially lasting 20 years only.</li> <li>3. Concern regarding general suitability of habitat for MNES within the proposed offset area.</li> <li>4. Proximity of proposed offset site to existing development municipal tip, quarry, residential housing.</li> <li>5. Concern for general natural values</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted. No further action required</li> <li>2. As described in cell C5. Likely to attract a term of 10-20 years subject to agreement between the landowner and Commonwealth Government.</li> <li>3. The offset area (Vermont Road) includes portions of land which are currently in poorer condition for Tasmanian devil and eastern quoll than exist within the Ecclestone Road impact area. This is deliberate and has been identified as such by the proponent for the purpose of demonstrating 'environmental gain' through improving the offset site with targeted management actions and habitat restoration efforts. No further action required</li> <li>4. Proximity to developed areas is not identified as a limiting factor that will prevent Tasmanian devils or eastern quolls from successfully utilising the offset area, particularly for foraging activity. Both the Ecclestone Road impact site and the Vermont Road offset area exist within peri-urban and agricultural modified landscapes, but neither support any particular barriers to utilisation of dispersal to and from these sites. Both the impact and offset sites include connectivity with nearby areas of intact forest and woodland that facilitate</li> </ol>

				dispersal for both species. No further action required 5. Noted that the emphasis of the referral remains on MNES (significant impacts to Tasmanian devil and eastern quoll). No further action required
John Pitt	24/03/2026	Email with attachment	<ol style="list-style-type: none"> <li>1. Habitat fragmentation following subdivision development.</li> <li>2. Increase in predator and disturbance pressures</li> <li>3. Overall nature negative result of the proposed development, including lack of clarity whether the offset will compensate for loss</li> <li>4. The current proposal has evolved significantly through the assessment process including design refinements, retention of a substantial balance lot, and development of an offset package</li> <li>5. Suggestion to apply the Biodiversity Net Gain approach to the offset determination.</li> <li>6. The need to account for development impacts including fragmentation, creation of new edges and increased interaction with the urban environment.</li> <li>7. Recalibration of the offset is warranted in order to achieve 150% to 175% of the residual impact area or 60 to 70 ha secured and actively managed across balance lot and remote offset site.</li> </ol>	<ol style="list-style-type: none"> <li>1. The location of the onsite balance lot offset area will substantially mitigate concerns regarding habitat fragmentation as it will maintain the main north-south habitat link which currently exists. Habitat connectivity east and west of the site is already fragmented by existing agricultural land (west) and broadacre urban development (east). No further action required</li> <li>2. Disturbance issues relating to Tasmanian devil and eastern quoll effectively described in the PD and have been accounted for through the calculation of habitat loss. Increased predator risk not a recognised threat to either of the relevant MNES. No further action required</li> <li>3. Proposed development is not believed to be nature negative when full offset proposal is taken into account including 14.6 ha local area of habitat avoided (balance lot) and 26.3 ha offsite habitat offset managed and improved. Habitat loss and offsetting compensation calculations have been undertaken in accordance with the offset assessment guide to achieve an overall offset of 102.94%. No further action required</li> <li>4. Noted and agreed. Proposal has evolved significantly overtime. No further action required.</li> <li>5. Biodiversity Net Gain approach, whilst a valid method, is not prescribed by the Offset Assessment Policy 2012 or within the Offset Assessment Guide. No further action required.</li> <li>6. Fragmentation impacts addressed in dot pint 4 (cell E6). Retention of local balance lot will substantially mitigate these effects and will maintain healthy viable habitat for both species within the local landscape. No further action required.</li> <li>7. Offset calculation undertaken on the basis of DCCEEW Policy and the Offset Assessment Guide. No need for recalibration or recalculation of offset deemed necessary.</li> </ol>
Vaughn Cox	25/03/2026	Email with attachment	1. Offset site suitability (especially Vermont Road)	
			a. no evidence of surveys to detect presence of protected matters	a. As described in the PD (2.2 and 2.3) both the Tasmanian devil and the eastern quoll are nocturnal species that are widespread throughout Tasmania (particularly the Tasmanian devil), with the eastern quoll observed infrequently in the wetter western third of the state. Both

	<p>species occupy large home ranges and disperse over large distances for foraging/hunting. The proposed action and Vermont Road offset sites exist within the core range of both species and also support habitats with a high likelihood of utilisation by both species at least for foraging based behaviour. Based on published habitat descriptions for these species, their dispersal biology, and our ecological knowledge of the offset area and surrounding landscapes an assessment based on habitat quality is considered appropriate for determining the likelihood of utilisation by both species.</p>
<p>b. no evidence of recent observations of the species on or immediately adjacent the offset</p>	<p>b. As described in various sections of the PD and offset proposal - according to the natural values atlas database there are total of 25 observations of the eastern quoll within 5 km of the offset area. This includes records as near as approximately 500 m south, 2.3 km east and 2.0 km north of the Vermont Road site. The most recent of these observations of the species are dated 19th January 2025. According to this same database there are 16 observations of the Tasmanian Devil within 5 km of the Vermont Road site including the nearest observations of 2.3 km east, 4.1 km south and 3.1 km north. The most recent observations of the Tasmanian devil are dated 2nd June 2024. Given the large dispersal capacity of these species, the above mentioned records demonstrate both nearby and recent observations of both species.</p>
<p>c. the offset is isolated from other vegetated habitat and surrounded by development, including future plausible threats from expansion of suburb of Ravenswood</p>	<p>c. Native habitat fragmentation is not a key limitation for foraging/breeding for either species with both Tasmanian devil and eastern quoll being abundant in fragmented landscapes. There are various existing habitat connections within the landscape surrounding the Vermont Road offset in almost all directions (see offset proposal) with the likely exclusion of the Remount Refuse Site and the Ravenswood residential areas. Despite the existing development of these areas the surrounding landscape is well connected and highly suitable for dispersal by both species (including agricultural landscapes which both species utilise for dispersal and foraging). The general levels of urban/agricultural development and habitat connectivity/fragmentation surrounding the proposed action (Ecclestone Road) and the Vermont offset are highly comparable (see Figure 5 &amp; 6 of offset proposal). We have no tangible evidence of urban expansion within the suburb of Ravenswood posing any future threat to the Vermont offset.</p>

d. to conform to Policy Principle 1 the protected matters must be present or likely to use the offset site	d. On the basis of the nearby known records of the species, ecological knowledge and published habitat descriptions of both species, there is a high likelihood that both species currently occupy the offset area, at least for the purposes of temporary foraging (and possibly more permanent occupation).
2. Habitat quality scoring	
a. questioning the justification for applying the same habitat scoring system to both eastern quoll and Tasmanian devil	a. Tasmanian devils and eastern quolls are co-occurring species in north and eastern Tasmania with overlapping home ranges and habitat requirements. According to published EPBC conservation advice guidelines both species share similar and overlapping foraging habitats including open forests and woodlands and agricultural landscapes. Denning habitat requirements are again similar for each and include a combination of rocks/boulders, logs and soil burrows. Prey species vary somewhat between the species (predominantly a size class separation) which is commonly observed in co-occurring scavenging mammals such as devils and quolls. On this basis it is reasonable to conclude that the same environments provide the same level of habitat suitability for these two species and therefore the same habitat scoring system for both species is valid.
b. habitat scoring system does not comply with the guide	b. the habitat scoring system is considered fit for purpose and can be adjusted up or down accordingly based on species parameters such as surrounding landscape context, stocking rate/known importance of the site to the species, the presence of important habitat features etc (refer Offset Proposal section 4, 4.5 and 4.9). Similar scoring methods have been applied to previously assessed and approved referrals for these specific MNES in the past (EPBC 2019/8597 and EPBC 2022/09295).
c. justification of the scoring system	c. Justifications for the scoring method are provided in the offset proposal.
d. concern regarding similar scoring systems used in previous EPBCA assessment/approval processes	d. Not for proponent to comment on. Current scoring system within offset proposal believed to be at a standard accepted by DCCEEW Assessments.
e. suggestion to use an alternate offset scoring method developed by Department and relevant stakeholders/independent experts	e. Direction from DCCEEW Assessments has been to develop an offset proposal in accordance with the Policy and Offset Assessment Guide. No direction has been provided to engage the Department or other stakeholders in the develop the scoring framework. Given previous instruction from the Department to progress project to advertising for public

	comment it has been assumed that the scoring methods applied to the offset proposal to date have been to an acceptable standard.
d. evidence of presence of species	d. described above, the calculation method is based on habitat potential
e. a statement of the number, nature, usage value of the MNES denning opportunities lost at impact site	e. included in calculation of habitat value of impact site (offset proposal 4.3)
f. evidence/discussion of the nature/value of the offset site for the two species	f. included in calculation of offset habitat (offset proposal 4.7)
g. what benefit do habitat stacks have to the two species?	g. habitat stacks including artificially constructed log piles are known to increase the rate of occurrence of both species (Jones et al , 2023 plus various other published references provided in the offset proposal pgs 23 and 24)
h. suggests comparing denning habitat offset to the offset of nest hollows or foraging trees for woodland birds	h. No direct comparison between mammal denning habitat and woodland birds nesting/foraging trees can be made. Example provided not considered applicable to the two MNES under consideration.
3. Calculated direct offset	
a. question calculation score applied to impact area	a. impact area is intended to attract an existing habitat score of 4. Offset proposal will be updated to reflect this.
b. questions the habitat decline scores under a 'without offset' scenario	b. reasons for habitat condition decline within the offset areas are described and justified in the offset proposal and are genuine and real threats. Unlawful access to Ecclestone Road has resulted in significant environmental damage and loss of trees, mostly through unlawful firewood cutting. The expansion of invasive woody weeds at Vermont Road is another real example of environmental decline which is expanding in coverage and will only worsen in the absence of intervention. As such condition decline scores of 1 across all offset sites is considered fair and to apply a no decline score to these sites at all is not considered a reflection of the future reality of these sites.
c. inconsistencies between Table 3 and other parts of the offset proposal	c. all scores throughout the offset proposal have been reviewed and updated for consistency between the text and Table 3.
4. Evidence, uncertainty and confidence in result	

a. design and use of habitat scoring system	a. the habitat scoring system applied in the offset proposal has been subject to review by DCCEEW Assessments team. Justifications provided in offset proposal.
b. application of same scoring system to both species	b. addressed in E14 above.
c. current/future usage by the two species at either site	c. addressed in E9 and E10 above
d. claimed quality decline without offset	d. addressed in E26 above
e. time to ecological benefit	e. time to ecological benefit scores applied in the offset proposal has been subject to review by DCCEEW Assessments team. Justifications provided in offset proposal.
f. evaluation of evidence and knowledge - suggested application of IPCC Guidance	f. evidence and knowledge justifications which have been provided in the offset proposal have been subject to review by DCCEEW Assessments.
g. peer review literature to support justifications	g. peer reviewed literature has been included as supporting evidence and justification for the offset (see offset proposal pgs 23 and 24).
5. Enduring outcomes	
a. Will an offset management plan be prepared and approved as part of the Conservation Agreement?	Our understanding is yes, there will be an OMP developed and submitted to the regulator for approval as part of the Conservation Agreement and that this agreement and associated OMP will form part of the project-specific permit conditions issued under the EPBC Act.
b. What will be the duration of the OMP. Will offset duration align with duration of impact.	Yet to be determined, but conceptually for a project of this scale we might expect a permit timeframe of 10-20 years with the OMP monitoring and implementation timeframes aligned with the 20 year timeframe. Whilst the full development timeframe for lots within the subdivision remain unknown at this point, a 10-20 year timeframe for all of the 38 lots is considered reasonable/appropriate based on anticipated uptake/demand for housing in the Greater Launceston area.
c. How will the OMP be varied to account for changing circumstances within the offset sites.	Such provisions to be determined as part of a monitoring and implementation schedule within the future OMP.