



REPRESENTATION IN RELATION TO KINGBOROUGH DRAFT LPS

This representation is made on behalf of Friends of North Bruny Inc. (FONB)

It is made after discussions between FONB, the Bruny Island Community Association (BICA) and the Bruny Island Environment Network (BIEN) which have resulted in a separate, joint representation by the three organisations.

One of the prime objectives of FONB, under our constitution, is to 'act as stewards for the protection and preservation of the unique environment and lifestyle of North Bruny for current and future generations'.

These objectives also, very relevantly for present purposes, include -

- working cooperatively with other community groups and organisations, local government, the State government and the Commonwealth government on issues which relate to North Bruny
- making representations to government, local government and other bodies and organisations on issues which relate to North Bruny
- promoting both awareness of environmental issues and care for the environment on North Bruny, and
- pursuing any of these objectives with respect to all or part of Bruny Island, or of the Bruny Island community, whether or not the matter specifically relates to North Bruny.

We have approximately 110 members¹, and it is a precondition of membership that the person be a resident of Bruny Island, a ratepayer on the island, or a family member of such a ratepayer. Our members thus include both residents, shack owners and other owners of land on the island, and we believe that we are reasonably representative of the perspectives of the community of North Bruny.

Our chief interest in making this representation is to support the proposal in the Kingborough Draft Local Planning Schedule (LPS) for a Specific Area Plan (SAP) for the island. We believe that the special features of the island, and the threats to which it is exposed, require special treatment.

¹ For context, the resident population of Bruny Island is just over 1000 people.

The special features of the island

A public gathering took place earlier this year at the Adventure Bay Hall, on 14 September, to launch the proposal of a new social enterprise called Kuno to produce an online field guide in relation to Bruny Island - a venture which is already under way.² The first speaker was Dr Tonia Cochran, who operates Inala Nature Tours, a world-renowned nature tourism business based on South Bruny, and she gave a very compressed but eloquent description of the reasons why, from the perspective of its natural values, Bruny Island is an extraordinary and internationally significant place.

We attach a copy of Tonia's notes for that talk, because they so clearly explain the natural significance of the island.

Highly important in the present context are Tonia's references to -

- the huge amounts of habitat on the island that remain minimally disturbed
- the fact that the island is a stronghold for wildlife and a refuge for a plethora of threatened species, many of which are endemic to Tasmania
- the two best known threatened species that occur on the island - the 40-spotted pardalote and the Swift parrot
- other threatened species which occur here, and for which the island is vital habitat - the Wedge-tailed eagle, the grey goshawk, and particularly the Eastern quoll
- the fact that all 12 Tasmanian endemic bird species occur on the island, with over 150 species recorded, and
- the fact that almost 80% of the 50-odd land and marine mammals in Tasmania have been recorded on the island.

It is because of such values that the island has been listed as one of 20 priority places in Australia under the Commonwealth government's *Threatened Species Action Plan 2022-32*.³ And importantly, the 'key threats' to the threatened species on the island noted by the Commonwealth include the clearing of land for agriculture, the clearing of land for housing, and tourism.⁴

However, there are other aspects to the island, beyond its natural values, that also need consideration when determining what land use planning controls should be put in place -

- its indigenous history
- its internationally significant role in early global exploration, as a stopping place for early explorers, and as a location for interaction between explorers and the indigenous inhabitants.
- its early history after European settlement, with whaling, forestry and the development of agriculture
- its scenic values

² <https://kuno.earth>, but see particularly <https://kuno.earth/field-guides/bruny-island>

³ <https://www.dcceew.gov.au/environment/biodiversity/threatened/strategy/priority-places>

⁴ <https://www.dcceew.gov.au/environment/biodiversity/threatened/strategy/priority-places/lunawuni-bruny-island>

- its largely undeveloped and often wild nature
- the fact that public access to the island is limited by the ferry service
- the fact that the island has only a small population, mainly living in a few dispersed settlements, and what might best be described as a cottage economy
- its limited infrastructure and services, including relatively poor roads
- the very limited public water supply, comprising a single plant in Adventure Bay which draws water from an aquifer threatened by increasing salinity
- the inordinate pressure now being placed on the island by tourism
- the risk of bushfire in such a rural setting, and the risks that bushfire creates in such a remote location.

It is for these reasons that we completely support the proposal to make the island the subject of a SAP. We believe that the Council has to have planning controls at its disposal that serve the needs of this special place.

Why this is so is illustrated by the case of a subdivision proposal for a large area of land at 37 Nebraska Rd, Dennes Point which was the subject of local controversy in 2023 and the of a permit granted by the Council in early 2024.⁵ The terms of that permit, somewhat varied by consent on appeal, were strongly driven by the correctly perceived need to protect threatened species, particularly the 40-spotted pardalote. This would not have been a consideration in many other places.

Are the terms of the draft SAP appropriate?

This, we believe, is the live question.

There is no point in having a SAP which is not respected as being a proportionate response to the special nature of the island. (Though a properly drawn SAP with a strong focus on environmental protection should get the support of the local community, given that the final report on the *Bruny Life Community Survey*, published in 2018, found that the protection of the natural environment of the island was considered the issue of greatest priority amongst the 691 respondents to the survey.)⁶

There is definitely a concern amongst landowners on the island that any proposal for a new use or development will get bogged down in planning processes, and that they will be forced to spend a lot of money getting expert reports before getting a decision. I know of islanders who are highly frustrated by the unpredictable delays and expense involved in the current processes, and of others who would rather modify their plans than engage with the Council. I have also heard it said that the only way of getting a smooth run through the process is to use a planning consultant or other professional to act as an intermediary with Council planners, and that it is unwise to try to do this unaided. These are unfortunate perspectives, and they perhaps help explain why the draft SAP has generated opposition on the island.

⁵ We understand that this development generated over 100 public representations, which itself demonstrates the public feeling in Dennes Point about potential changes to the character of the local area.

⁶ <https://www.kingborough.tas.gov.au/wp-content/uploads/2018/06/Bruny-Life-Final-Report.pdf>, p 3

It is therefore essential that the SAP be easy to understand and to operate. But we also believe that it should take account of the many values and issues set out above.

We would add that we are nervous about any reference to aquacultural production⁷ as being one of the ingredients in the unique mix of activities that characterise the island. True it is that many tourists come to sample the oysters and mussels that are grown here, but any reference to aquacultural production brings to mind the salmon industry. The salmon feedlots that now largely encircle the island degrade it by visual and noise pollution and by excessive nutrient release, plastic debris and other forms of environmental harm, and we see it as a totally inappropriate industry to occupy waters surrounding an island of such natural significance. We would be very much opposed to any additional shore-based salmon farming facilities being based on the island.

On the other hand, we support the references to only supporting or encouraging 'low-key tourism'⁸. The level of tourism now coming to the island is excessive, and is detrimental to its environment, ambience and lifestyle.^{9 10} This will become an increasing issue as community groups on the island advocate for ways in which the problem of overtourism can be addressed. The SAP is able to make some contribution in this regard.

Beyond these points, we think best to leave detailed comment on the draft SAP to individual landowners, addressing the way it applies to their properties.

The joint representation asks for public consultation on the content of any SAP or SAPs, and expresses the willingness of the three community groups to participate in such a process. If, on the other hand, the present process results in negotiations over the language that should eventually be included in the SAP, we ask to be included in those negotiations.

Yours faithfully,



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⁷ As in KIN-S6.1.1

⁸ As in KIN-S6.1.3 and KIN-S6.3.1.1

⁹ It is also unfair that the financial burden of providing local government infrastructure to cope with this level of tourism should fall on the ratepayers of the municipality, unaided by the State government, which is so willing to promote it as a tourism destination.

¹⁰ The ratio of permanent residents (1000 or so) to visitors (at least 150k a year) rivals or exceeds that of other places in the world which are suffering from overtourism - eg Venice, Barcelona, Iceland etc..