



**OFFICE OF THE COMMISSIONER
FOR THE ENVIRONMENT
ACT**

ABN: 14 526 086 507

Dr Hanna Jaireth
Committee Secretary
Standing Committee on Planning and Environment
Legislative Assembly
GPO Box 1020
CANBERRA ACT 2601

Dear Hanna

Thank you for the opportunity to comment on Variation to the Territory Plan No.257, Suburb of Crace, Gungahlin. Our comments follow.

General/Process:

Figures in variations should be drawn to the same scale so 'before-after' comparisons can be made.

Detailed:

Para 1.4.2 – *General Planning Principles*

2nd dotpoint – Suggest that 'appropriate native vegetation' be changed to 'appropriate native vegetation from local seed provenance'.

3rd dotpoint – change 'where possible' to 'as a priority'

4th dotpoint – Suggest insert 'potential for' significant adverse impacts

11th dotpoint – Suggest that the retail centre should also be accessible by public transport (cf the 9th dotpoint about community facility sites)

General Policies (ref Figure 1.2)

There is potential for conflict between General Policy H (location of small scale community facility uses in open space) and Specific Policy 7 (retain important group of trees within open space). See also Para.1.4.8 – *Ecological Values* – 'approximately 80% of the mature trees on the site contain hollows, which are likely to be suitable as nesting sites for wildlife'. (Better mapping may reveal that such a conflict may not exist.)

Specific Policies (ref Figure 1.2 and Figure 1.3)

Para 1. There is a potential traffic problem with access from/to Gundaroo Drive – there are already significant delays with vehicles attempting to enter the roundabout and head south on William Slim Drive. Without plans to widen Gundaroo Drive egress from Crace onto Gundaroo Drive in the morning will be impeded.

Para 1.4.9 Urban Edge Interface (b) Gungaharra Grassland Nature Reserve – Interface issues

Assuming the buffer is Hills, Ridges and Buffers, the proposed buffer is very narrow in places.

Para 1.4.10 –Transport Network

2nd para – see previous comment about existing traffic buildup on Gundaroo Drive.

Para 1.4.11 Stormwater Management

It is appropriate to consider stormwater as a resource rather than a problem to be exported quickly. However the extent to which water will be held back from the main creek system (as a result of creating landscape water features and aquatic habitats) is not clear. It is also not clear whether this is likely to have any negative downstream impacts on the creek/whether such impacts have been explored. If this aspect has not been considered, advice on the matter should be sought from the Wildlife Research and Monitoring Unit of Environment ACT.

Yours sincerely

Dr Rosemary Purdie
Commissioner