

The Manager
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Comment on Draft Variation to the Territory Plan No. 231 and the related Preliminary Assessment (Kenny, Part Throsby, Part Harrison & Goorooyaroo Nature Reserve)

The Conservation Council's mission is to achieve the highest quality environment for Canberra and the surrounding region. In that context, it is of great concern to the Conservation Council that the ACT Government wishes to pursue significant greenfields development in the area of east Gungahlin. The proposed developments would result in significant degradation of arguably the most significant box-gum woodland remnant remaining in Australia.

The Conservation Council enthusiastically supports the establishment of Goorooyaroo Nature Reserve, including the area of secondary grassland proposed to be included in the reserve. However, we remain very disturbed that large scale urban development is still proposed in Gungahlin around the important Mulligan's Flat/Goorooyaroo Reserve complex, the largest woodland complex of its type left in public hands in Australia.

This woodland complex has immense importance regionally, and indeed nationally, and the proposed development deserves a much more rigorous and detailed assessment than the cursory treatment of its ecological values that it has received in this document.

In our submission to the draft spatial Plan, the Conservation Council recommended:

- greater priority be given to urban infill along key public transport routes particularly near transport nodes and around the larger town centres to minimise the need for greenfields development;
- no further development in North and East Gungahlin on land which is remnant threatened woodlands and grassland, and /or provides habitat and corridors to listed threatened species including bird species currently under consideration for listing;
- urban development next to or near land with remnant threatened woodland only take place subject to the following planning measures – buffer outside of the reserve edge of at least one kilometre between housing and the reserve, cat free zones and other appropriate measures to ensure maintenance of the biodiversity values of the reserves;
- development of the proposed suburb of Throsby not take place for fire abatement and nature conservation reasons.

As recognised in both the Preliminary Assessment and Draft Variation document, the area of interest is an important component of one of the largest, most intact and contiguous areas of

Yellow Box - Red Gum grassy woodland in the ACT and provides habitat for many threatened and declining woodland birds. Mapping in the ACT suggests that the Yellow Box - Red Gum woodland at East Gungahlin is about 500 ha larger than any other such remnant in the ACT and at least three times the size of any Yellow Box - Red Gum woodland elsewhere in Australia. Yellow Box - Red Gum Grassy Woodland was once an extensive ecosystem covering in excess of 25,000 square kilometres, in a belt stretching from Melbourne to South Queensland. Over 90% of its former range has been cleared and the majority of what remains is fragmented into remnants of less than 2ha in area.¹

Outside of the ACT, Yellow Box - Red Gum woodland exists as fragments within an agricultural landscape. The ACT and in particular the East Gungahlin area is the best representation of a Yellow Box - Red Gum ecosystem and dependent biodiversity anywhere. The Gungahlin area provides the best chance for the retention of ecosystem function and species viability in this woodland type.

Partially as a factor of its size and range of habitat present, the woodland remnant at Mulligans Flat - Gooroo is also one of the most diverse, at least in relation to plants and woodland birds, Yellow Box - Blakley's Red Gum remnants in Australia. It also supports a relatively large number of threatened and regionally rare plant and animal species.

It is a key area for woodland conservation in Australia.

Extended development in Gungahlin will be at the loss of considerable areas of the endangered Yellow Box Red Gum ecological community and Natural Temperate Grasslands, both of which are threatened communities, which will in turn directly diminish habitat for a number of regionally vulnerable and declining bird and fauna species. The proposed expansion of Gungahlin will also indirectly impact on these species due to the increase in domestic pets and human traffic that will eventuate.

Therefore the Conservation Council argues no further development in North and East Gungahlin on land which is remnant threatened woodlands and grassland, and /or provides habitat to listed threatened species including bird species currently under consideration for listing.

In addition the Conservation Council argues that development next to or near land with remnant threatened woodland only take place subject to the following planning measures - buffer outside of the reserve edge of at least one kilometre between housing and the reserve, cat free zones and limited access to reserves and ecologically sensitive areas. Application of this would mean that substantial areas of the proposed suburbs of Forde and Bonner would not be developed and would in effect become part of the bushfire buffer zone.

From a slightly different perspective the Conservation Council argues that the proposed suburb of Throsby (Gungahlin) not take place for fire abatement and nature conservation reasons. Although the land itself may not be regarded as high quality woodland/grassland there are a number of issues including:

¹ Mulvaney M.J. (2002). Nomination to the Commonwealth of Yellow Box - Blakley's Red Gum woodland as an endangered ecological community.

- particular shape of the suburb, if developed, would pose significant fire abatement issues.
- shape of Throsby, if developed, would create a long urban edge next to the reserves of Gooroo and Mulligans Flat, with potential negative impacts on the nature conservation values of these reserves.
- trees in the northern part of this area (the neck), where it abuts the old coach road through Mulligan's Flat were utilised last year by an ACT and NSW listed threatened species (Painted Honeyeater)
- the northern part (the neck) is also adjacent to the large dam wetland at Mulligan's Flat Reserve and an urban area immediately adjacent is likely to compromise the biodiversity of this part of the Mulligan's Flat reserve

It is suggested that this land could be used as sportsfields, restored for its riparian, grassland and habitat values or retained as rural lease with a strong conservation management focus.

Planning for Throsby needs to be much more sympathetic to ongoing woodland function and threatened species conservation. The design should also allow for the enhancement and expansion of the woodland remnant rather than a focus on present condition.

The Conservation Council is strongly of the view that the preliminary assessment is inadequate in terms of detailed ecological information that would properly inform sound decision making on the environmental impact of the proposed suburban development. We recommend that a detailed and rigorous environmental impact assessment, (EIA) be required and undertaken. We believe that the conservation values and issues relating to the adjacent reserves are so important that this development requires the highest level of environmental assessment under current planning laws, before planning for development proceeds any further.

Members of the Conservation Council with detailed knowledge of the subject area have prepared separate submissions on this development proposal, namely COG and Michael Mulvaney, we refer you to these submissions which we endorse.

The Conservation Council is concerned by the very short period of time provided for comment on this significant development proposal. The timeframe is inadequate for consultation with members and has coincided with a number of other documents from ACTPLA requiring comment within the same short time period.

Yours sincerely

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Director