

Deb Foskey MLA

Member for Molonglo

Molonglo Project
Planning Services Branch
ACT Planning and Land Authority
GPO Box 1908
Canberra ACT 2601
terrplan@act.gov.au & molonglo@act.gov.au

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Re:
Draft Variation to the Territory Plan No. 281 Molonglo and North Weston (DV281) AND
Preliminary Assessment (PA) of a draft variation to the Territory Plan (DV281) and major infrastructure associated with urban development at Molonglo and North Weston, August 2007

Submission from Dr Deb Foskey MLA on behalf of the ACT Greens

1.1 Introduction

This submission relates to DV281 and its PA.

Please note that while I am making this submission on my own behalf, as the elected Member of the ACT Greens, it is made on the basis of Greens policies in regard to planning and environmental protection.

1. Environmental Assessment

1.1 Ecological implications

A number of environmental studies were conducted into various aspects of the natural landscapes of the area, and the species that depend upon them. Not all of the findings were acknowledged in the PA document, and most appear to have been disregarded. I thank ACTPLA for making the studies available to my office and I am hopeful that increased availability of the reports indicates that the ecological aspects will be given full consideration in the final conceptions of planning in Molonglo-North Weston.

Overall, the documents indicate that ACTPLA has taken insufficient account of riparian needs, threatened species habitat, and the current plans fail to ensure an effective buffer zone around Kama woodland.

Taking insufficient regard to the ecological implications of the Molonglo Valley Development will accelerate the decline of our endangered species, particularly birds and lizards, and the endangered grassland/ woodland communities which they rely on for habitat.

My greatest concern is that the Draft Amendment largely ignores the ecological value of the Molonglo Valley and, in particular, ignores the

Dr Deb Foskey
Member for Molonglo
Phone: 02 6205 0161
Fax: 02 6205 0007
foskey@parliament.act.gov.au

ACT Legislative Assembly
GPO Box 1020
Canberra ACT 2601



recommendation of the NCA commissioned Redgum Molonglo River Corridor Boundary Study which argues against the development of a lake, preferring a chain of ponds effect instead for environmental reasons.

1.2 Kama woodland/ buffer / wildlife corridor

Noting that 99.5% of National Natural Temperate Grassland has been destroyed along with 92% of National Yellow Box/Red Gum Grassy Woodland and that 80% of ACT habitat for woodland birds has been lost to development, further proposals to destroy natural temperate grassy woodland should be reconsidered. Instead, we should be expanding rehabilitation projects to restore damaged habitat, rather than further destroying healthy and compromised high-value habitats. If the development of the Molonglo precinct enhances ecological outcomes, the Greens will support it. The current proposal gives minimal protection and must be reconsidered.

Latest data indicates that there are approximately 12,100 ha of Yellow-Box Red-Gum Grassy Woodland (YBRGGW) (critically endangered ecological community) remaining in the ACT, including areas in poor ecological condition; approximately 1,662 ha of this is within the Molonglo Valley - a significant 14%. The woodland habitat in Central and West Molonglo provides connectivity with other woodland and grassland habitats. There is a strong consensus among biologists and environmentalists, including many who provided reports to ACTPLA, that the development of Central Molonglo in its current form, which would destroy 655 hectares of Yellow Box/Red Gum woodland, should not go ahead.

The Kama Woodland Reserve between East Molonglo and Central Molonglo is of particular importance due to its habitat values for rare and threatened species. While we appreciate the protection afforded it, the Greens consider it too narrow on the east-west axis to be a viable reserve nor to operate as an effective wildlife corridor; a sufficient buffer must be allowed and rehabilitated. Biologists estimate that a buffer zone at least 200m in breadth should be added to the reserve. Sporting grounds and other open air activities would serve a dual purpose in providing recreational facilities and ensuring low fuel areas for bushfire prevention purposes. Key natural heritage values identified for Kama include: the YBRGGW and NTG community; its relationship to the riparian habitats along the Molonglo River; the area's function as a habitat for a small population of Brown Treecreepers and pink-tailed worm lizards; and the wildlife and habitat connectivity essential to ensure species resilience to climate change impacts.

Hopefully by the time this Development is underway, there will be sufficient, relevant expertise and knowledge gained from the Mulligans Flat and Goorooyarroo projects to be applied in the Molonglo Valley.

It is of grave concern that vital information from the Molonglo Valley Ecological Impact Review (2006), prepared by Biosis, is missing from the Preliminary Assessment, especially regarding bird and river impacts. This report has only just become available to me, and I hope that this means it is

now in the public domain.

1.3 Threatened Species & Communities

I am aware that the Molonglo development will likely set off two triggers to s.18A Threatened Species & Ecological Communities of the Environment Protection and Biodiversity Conservation Act 1999, meaning that this proposal would cause a 'Significant Impact on a matter of national environmental significance':

Vulnerable Species: *Aprasia parapulchella* (Pink-tailed Worm Lizard); and Critically Endangered Ecological Community: Yellow Box/Red Gum Grassy Woodland. The ACT has responsibility for the greatest area of YBRGGW remaining in Australia and the woodland in the Molonglo Valley is regionally significant, due to regional variation of the tree species.

Birds

If Central and East Molonglo are to be Canberra's next township, they must be developed as a truly bush urban environment. The fate of the population of birds now nesting and feeding there depends upon it.

Studies (Debus 2005, Olsen and Fuentes 2004 and Biosis 2006) indicate that the Molonglo Valley has been known as a rich habitat for woodlands birds, from the Brown Treecreeper to large raptors, since at least the 1990s (Olsen and Fuentes 2004).

One of the ornithologists who provided the first comprehensive studies of raptors of the Molonglo Valley, Jerry Olsen, is scathing about the notice taken of his and Debus' concerns for the future of the wedge-tailed eagles who have fed their young in the casuarinas beside the Molonglo River and the apparent search for more congenial zoologists who would declare that development might not affect the future of these and other raptors (Olson 2007).

It is disappointing that Olsen and Fuentes' recommendations for further research of the home ranges and foraging habitat of the white-bellied sea and the Wedgetail eagles and Peregrine Falcon, possibly by radio tracking has not been implemented and they must be, in order that future residents and visitors can watch them soar, if the Molonglo Valley development is to maintain any credentials as environmentally sustainable.

Olsen implies (2007) that any development of the Central Molonglo area will be deleterious and there is no refutation of his views in any of the other studies commissioned on the Molonglo Valley.

One of Canberra's greatest assets – its native bird population and the woodlands they rely upon – must be regarded as more than an environmental asset. Economies reliant on the clearance of native vegetation are not sustainable and to become so, the life-enabling services of natural environments will need to be incorporated into Territory budgets. In terms of climate change, woodlands will be a partial offset to energy use in the new

suburbs (see below, **Climate Change**).

Debus agrees with Olsen and Fuentes but also proposes that, any development that goes ahead mandate cat containment, attention to the timing of any clearing and inducements to extend habitat in yards and gardens.

O'Sullivan and Beitzel (Biosis 2006) judge the Kama corridor to be inadequate to compensate for the cleared woodlands in maintaining bird populations. Instead, they suggest improvement and extension of the existing woodland corridors, such as connectivity to the Murrumbidgee River corridor.

A study completed in October 2007 by EA Systems Pty Ltd of observation over one week (in a drought, in adverse weather conditions and with limited access to some areas), corroborated most of the earlier findings but its terms of reference were very narrow and may be used to justify poor decisions based on the 'protection' of one or more defined areas; it is unlikely that these will ensure the long term survival of raptor and other birds in the Molonglo Valley. This is an area in which compromise may have similar outcomes to intended habitat destruction.

By implication, and directly stated by Olsen and Chris Davey (2007), the new 'sales-enhancing' dam on the Molonglo River to create a recreational lake is seen as destroying nest sites, drowning riverine and ecotone habitats and compromising the ability of the river corridor to provide feeding and safety sites for birds and creatures - especially important in an area where woodlands elsewhere will be reduced.

Reptiles

The river corridor is home to at least five species of reptile that are geographically uncommon in the region (Stone gecko, Marbled gecko, Eastern copper-tailed striped skink, Boulenger's skink and the Nobbi dragon) and species such as the eastern long necked tortoise and the black-headed snake have been recorded at Coppins Crossing (EACT 2001). However, ACTPLA has commissioned a study on the distribution of the pink-tailed worm lizard only, and its studies of storm water entrapment indicate little regard for other lizard and frog inhabitants of the Molonglo River corridor.

Options for the River Corridor

The Molonglo River is the second largest river system in the ACT and it is already severely compromised by Scrivener Dam, the establishment (and later destruction by fire) of pine plantations and grazing activity. The addition of another dam downstream cannot be justified environmentally, and its enhancement of property values may be over-rated in the light of current knowledge of biodiversity impacts and climate change considerations.

The studies commissioned by ACTPLA on storm water management options (Cardno Young 2007; 2006) reflect the expertise of the consultants

(“Engineering the future”; “Shaping the future”) and environmental impacts are considered elsewhere (Biosis 2006).

The benefits and losses of this dam are nowhere considered in detail. In passing, I am sure that many Canberra people are unaware of the potential loss of the areas they enjoy above and below Coppins Crossing. The Biosis report quotes a 1998 report by Adair and Groves which describes the area downstream of Coppins Crossing as ‘one of the important wildlife corridors linking the river system and mountain ranges to the urban bush and waterways of Canberra’. It is the habitat for plant and animal species considered threatened under ACT and/or Commonwealth legislation. While it is already known that it provides nesting sites and home territories for the Wedgetail Eagle, the Brown Gosling and Brown Falcon, O’Sullivan and Beitzel recommend further work on the impacts on river adaptation on the Pink Tailed Worm Lizard.

The Lake option affects 6.8 kilometres of river length, including a corridor nature reserve. There are many impacts of the construction of a dam which have been left out of ACTPLA’s considerations: the construction itself, the development of urban centres nearby meaning greater sediment and nutrient loads entering the river and contributing to blue green algae outbreaks in warmer weather (as is becoming a recurrent problem for Canberra’s other lakes). As well, native fish will lose the power of movement and up and downstream and invasion by non-native species will be made easier by the more conducive habitat of relatively still cold and deep water.

The one benefit that ACTPLA and the lake supporters can claim for the lake is its ability to improve water quality; any benefits, however, may only partly mitigate the sedimentation and disturbances caused by the dam’s destruction. The building of Tuggeranong Town Centre and Lake was observed to reduce platypus and macro-invertebrate communities. The only way this can be prevented is by ensuring that all water that enters the lake is as clean as is possible, an outcome yet to be achieved for storm water entering any of the other lakes.

Three main options were considered for managing storm water in the Molonglo Valley: a lake and a Weston Creek pond; a lake and a number of ponds; and a chain of cascading ponds. All the environmental studies commissioned to look into these options found that the environmentally-preferred option would be the chain of ponds. (The option of leaving the river as a river with rehabilitated wetlands and protected river verges was inadequately explored.)

Yet, for unknown reasons, this work has been entirely dismissed, and instead this Amendment proposes a large lake. I have attended a number of public presentations to community organisations about the proposed development and each time the lake option was presented as the preferred option. I note that NCA and ACTPLA representatives have been present at these consultations, so I assume that ACTPLA prefers this option.

By contrast, all the ecologists I have made contact with strongly oppose this

approach.

This is because the river corridor must continue to facilitate the protection of water quality in the catchment. To this end, the integrity of buffers, protection of inflows and vegetation that naturally filters over-land flow need to be protected. The proposed 6.7 km long, 25m deep, Lake Molonglo poses significant threat to many of these aspects of the present environment.

It is highly disappointing that ACTPLA and NCA favour the Lake because 'it achieves the desired outcomes for water quality control, urban design, recreational uses, and will create an attractive and significant landscape feature for the entire area'. These criteria do not take into account environmental considerations, and also completely ignore the advice of the Molonglo River Corridor Boundary Study (2007) which recommended against a lake because it would be incompatible with the environmental criteria (ecological, environmental, water quality, flood levels, landscape, cultural, recreational) of the National Capital Plan.

While the corridor alignment allows for a buffer between the Lake edge and development, inundation will result in the loss of virtually all riparian vegetation in the vicinity of the lake. To this end the remaining 'buffer' is essentially grassland on steep slopes that will require some form of re-vegetation. Landscaping for public amenity and safety issues will be unable to replicate a functioning 'natural' riparian zone and even well meaning re-vegetation will likely cause damage to important Pink Tailed Worm Lizard (*Aprasia parapulchella*) habitat. The corridor is also well known as a frequently used nest site/hunting ground for various raptors, especially of note, the Little Eagle. In addition, whilst the inundation only directly reduces *Aprasia* habitat by 2.3ha, public access and landscaping along the lakes edge will probably destroy the remaining viable habitat. The ACT Conservator of Fauna/Flora acknowledges this habitat destruction and recommends protecting remaining populations. The Lake proposal fails to do this. In fact, the 'preferred' river corridor seems to ignore *Aprasia* habitat, which it dissects in many places. The preferred river corridor seems to follow a pre-determined distance from the river itself, rather than taking any account of habitat-values or settling pond/wetland considerations.

Despite the dreams of planners, nature is invariably not symmetrical and adaptable to the straight lines of the street pattern proposed for Molonglo.

Taking into account these issues, the NCA/ ACTPLA preferred option of a lake seems to fail the following National Capital Plan objectives and is contrary to the high standards that the ACT has pledged for environmental management:

- To conserve the essential landscape and environmental character of the river and its natural and cultural values and to provide a balanced range of river and off-river recreation and other uses in a manner that reinforces and protects the river corridor as a unified system.
- To protect the ecological resources of the river and river corridor, preserving natural areas in a relatively undisturbed state, maintaining a

diversity of habitats, protecting significant natural sites and native plants and animals, and sustaining the ecological integrity and continuity of the river system for migrating fish and other wildlife populations.

The overall principle for 'River Corridors' is to 'protect and enhance the environmental quality, landscape setting and the natural and cultural resources of the Murrumbidgee and Molonglo River Corridors'.

River Corridor

The river corridor boundary must facilitate the protection of water quality in the catchment. To this end, the integrity of buffers, protection of inflows and vegetation that naturally filters over land flow, needs to be protected. Lake Molonglo poses significant threat to many of these aspects of the present environment.

I have commented on the proposed lake (above); this section includes some further comment.

Relevant NCP provisions are:

Corridors for the major rivers in the ACT will be protected from urban encroachment and inappropriate development. The ecological resources and environmental quality should be conserved and the character of their landscape retained and reinforced;

The stream flow and water quality of the rivers shall be protected from adverse external influences and maintained in a manner which ensures compatibility between land uses, water uses and the environmental character of the rivers and in accordance with criteria for the use of rivers and the protection of the aquatic environment;

Relevant studies

The Molonglo River Corridor has been the subject of many ecological/environmental assessments. Perhaps the most frequently debated values of the corridor relate to the known habitat of the Pink Tailed Worm Lizard (*Aprasia parapulchella*) and the corridor as a frequently used nest site/hunting ground for various raptors (especially the Little Eagle). These are major issues but in considering one or two species the broader role as habitat for diverse species should not be overlooked.

The Molonglo River Corridor Boundary Study 2007 includes a table which shows the consistency of the recommended Option with the values in the National Capital Plan; much of this is not mentioned in the Draft Amendment.

The Study shows that the 'chain of ponds' option has these benefits:

Conserves a TBRG Grassy Woodland ecotone which provides natural buffers to the river corridor and riparian zone;

Protection of threatened species habitat, particularly minimising impact on important Aprasia habitat on the fringe of the river corridor;

Allows for rehabilitation of watercourses that are important for wildlife movement and gene flow;

Maximises Raptor nest site protection;

Allows for conservation and rehabilitation of Misery Hill as an important habitat and ecotone;

Aims to protect and enhance water quality in the river corridor by protecting riparian fringe and instream vegetation (natural 'bio-filters');

Includes important tributaries as part of the corridor system to improve the quality of inflows pre, during and post development;

Includes areas proposed for water based recreation and allows for passive recreation pursuits in areas that are easily accessible and have a high degree of public safety (minimal steep slopes);

Allows for further assessment to consider appropriate siting of built facilities as well as providing appropriate alignments for constructed walking trails and look-outs as they relate to the 1 in 100 yr flood level;

Ensures development is excluded from steep slopes on the incised banks of the corridor; and

Protects the three known Geological sites of significance.

1.3 Heritage

I note that the Kama Woodland, consisting primarily of partially modified YBRGGW and natural temperate grassland (NTG), has been nominated for inclusion in the ACT Heritage Register, which the Greens support.

The Pioneer cemetery site must be protected to preserve the memory of the Pioneers of the district. Maintaining Canberra's connection to its history enriches our perception of who we are as Canberra dwellers.

For this reason, it would seem a good idea to retain the old houses on existing leasehold land prior to development: to ensure a human presence in what will otherwise be vast areas of uninhabited redeveloping landscape: in recognition that rental housing is in short supply in the ACT; to assist in community development as new settlers move into the new streets; and to maintain local knowledge of natural and historical culture.

It is important that sites special to the Ngun(n)awal people and other Indigenous users to the area are respected and treated in accordance with the

wishes of traditional owners.

The Coonan's woolshed is of high historical significance. Incorporated in its structure are timbers from Coppin's original homestead. The site of Coppin's original homestead contains some original stonework/foundations, which should be maintained, and incorporated into a park of some description. The farmers of the area must be rightfully given their due place in any future developments of the Molonglo Valley.

2. Sustainability – infrastructure

Any future urban developments should aim for carbon neutrality. The principles of sustainability must be applied at each stage of design and implementation.

Public transport infrastructure should be at the forefront of Molonglo and North Weston development planning and put in place before the suburb is developed. Sustainable transport must not be an afterthought but must be integral to the design of the new town and suburbs. Joint NCA/ACTPLA public transport planning and funding needs to be given a higher priority, and investigation into the feasibility of light rail should be prioritised in the context of this development. It is clear that it is not currently a high priority, as the General Policy Plan shows the Proposed Arterial Road System, whilst the Inter-Town Public Transport system is only an Indicative Route. It is essential that neighbourhood design is based on walking and cycling within the local area - especially to schools and local shops - and safe cycling infrastructure to town centres. Canberra has many existing suburbs which have successfully integrated walking and cycling with reasonable bus services and their amenity is highly sought by home buyers.

A dedicated rapid transit (light rail) link route to Civic, to Weston Creek and Woden (and preferably to Tuggeranong) and to Belconnen (and preferably to Gungahlin) should be considered. A loop light rail line around the new urban area could provide a continuous quick link to the rapid transit line (linked with on-call mini buses or other appropriate demand responsive transport). Key access to the new areas for most purposes should be easily accessible by fast public transport rather than major upgrading of access roads. People will appreciate having their ecological footprint reduced by good planning and many will be seeking this for their families' future. Molonglo is a development of the future and farseeing planning is needed.

Because the basic infrastructure for Molonglo is being set in place now, planners must be mindful that this will be a town where people will live in the middle and latter half of this century. It must contribute to a city that is sustainable to the highest degree, and that means considering street and housing block orientation, community grey water systems and other technologies to reduce water use and create energy where feasible. Plantings of native bushes and trees in parks and larger gardens will provide habitat for birds and native insects. That our future urban landscapes will also need to provide for more of our needs, as the future residents of Canberra grapple with

the realities of a changed climate, expensive and scarce oil products and their flow-on effects. Food miles will become a factor in price of food, and local and regional production is likely to be an essential adaptation to climate change.

This means that measures to enhance community development should be at the basis of neighbourhood planning, with schools acting as community hubs, to build in resilience at the local level. (The See Change movement has already grasped this principle and communities are working in some suburbs to reduce their suburb's ecological footprint.

Designing for sustainability will need cooperation between government departments, developers and other private interests and community organisations. A group of people who are interested in living in sustainable suburbs should act as a reference group as ACTPLA appears to lack this expertise.

This proposal does not show signs of being sustainable in any sense. There is no evidence of understanding that new designs would make urban living more sustainable; there is no sign of sustainable public transport being prioritised, and there seems to be little regard for the endangered species and ecological communities which currently battle to call the Molonglo Valley home. There has been a hint that streets and blocks may be designed to give a better solar orientation for houses which we wholeheartedly support, especially given that the Solar Feed In Tariff Laws are likely to come into play in 2008. The 'showcase' energy efficient suburb developments in Gungahlin are the latest in a long line of disappointing but highly spun efforts by our planning authorities to implement 'best practice' in Canberra. There is no innovation in the Molonglo plans we have before us, although the landscape design students at the University of Canberra were able to come up with a plethora of ideas which could go a long way to making the Molonglo Valley not just habitable, but a joy to live in, in harmony with the surrounding environment. While ACTPLA has some runs on the board in terms of water management, the evidence on the ground gives me very little cause for optimism that either the LDA, ACTPLA, the ACT Government or the NCA have the will to use the powers available to them to ensure that the Molonglo Valley will represent a significant step forward in the implementation of environmentally responsible, socially intelligent and energy efficient urban design.

One of the objects of the NCP is to 'support and promote environmentally responsible urban development practices'. I highly recommend that the NCA and ACTPLA, along with the ACT Government generally, take a step back and rethink how new urban development in the Molonglo Valley could be more sustainable and appropriate to 21st Century living. One thing is for certain - the lake is not an appropriate proposal and should be taken off the drawing board. Perhaps some of the ideas of the UCAN design students, as well as those from Derek Wrigley, could be incorporated where appropriate. Business as usual is no longer good enough. Let us not rush Molonglo but instead aim to achieve urban design which provides lessons in greenfield development for inland cities around the world.

3. Molonglo Valley Structure Plan

I note that throughout the feasibility studies, there is no evidence that the option of ‘no urban development’ was considered.

In terms of urban suitability, it does make sense to develop areas in the Molonglo Valley, especially the degraded farmland and much of the past softwood plantation estate of little ecological value, for future housing development.

I propose that those parts of Central Molonglo where the threatened grasslands and woodlands are intact and ecologically valuable be put aside for their survival, suggesting that with thoughtful management regimes such areas would enhance the social and ecological viability of other developments in the Molonglo Valley. We need to ensure that there is sufficient buffer alongside the Kama woodland so that the grassy woodlands are not adversely impacted upon. Note that I would include in the category of ‘intact’ those areas of grassland and woodland which are deemed capable of restoration. The ‘buffer-zone’ areas adjoining the higher value habitats should be given a high priority for restoration.

ACTPLA claims that extensive public consultation was an integral part of the preparation of the Structure Plan. There was consultation in the development of the Spatial Plan, although opinions differ about its incorporation of community views. This was at such a broad brush level that it does not suffice for this process. Nor does the writing of submissions, as I am doing now, constitute adequate consultation. The views of ecologists, bushlovers, people who have thought about and wish to put into practice, sustainable living, will contribute. I am convinced that the know-how of socially and environmentally sustainable living is abundant in our educated, thoughtful community, and is a resource to be welcomed, rather than feared as seems to be the practice of the ACT Government.

3. Territory Plan Map

The ACT is in the process of developing a new Territory Plan. The current version still lacks protection of community and environmental values. For instance, an overlay of vegetation communities and their management status would give community members, developers and planners alike a framework for balancing environmental needs with social needs.

4. Proposed land use policies

4.1 Residential

Residential land uses policies under the defined land overlay are intended to allow for a wide range of residential, mixed use (residential and commercial) and limited community facilities. A wide range of housing types and densities is proposed as reflected in the structure plan report.

All residential housing and commercial premises should be designed on

sustainability principles, which should be understood to be mandatory: for example, all dwellings are to have rainwater collection tanks, internal recycling of greywater, solar water heating, 5+ thermal rating, and designed so that air conditioning will not be needed. Design rules for housing are needed to ensure that housing meets these principles.

4.2 Commercial

The PA documents indicate that a reversion to the old NCDC hierarchy of shopping centres and community facilities is planned in part.

Group Centre

The group centre is proposed to be located south of the Molonglo River ... on main public transport routes [with] good connectivity to surrounding areas to maximise ease of vehicular and pedestrian access.

Comment: The Group Centre should not be placed so that traffic and other activities compromise the values of the river and its buffer zones. Board walks will allow pedestrian traffics which providing the greatest opportunity for the survival of reptiles and invertebrates.

Small Group Centre

A small group centre is proposed to be located at the intersection of the Bindubi Street extension and the north-south arterial road. The adjacent watercourse is suited for an urban park, with opportunities for water management, passive recreation, and shared pathways.

Comment: It is important that the intended users of this facility are involved in its planning. Is it for young children and families? It is also crucial that the waterway is respected primarily as a tributary eventually feeding the Murray Darling Basin – here is a chance to ensure that Molonglo residents are aware of their role as residents in their own food bowl.

Local Centres

Local centres will be designed as a focal point for the local community and will accommodate small-scale commercial, medium density housing and, where appropriate, community facilities.

Comment: I am interested in ACTPLA's definition of 'local' and whose idea of 'appropriate' will prevail. Communities need more than shops and coffee lounges to strengthen them and enable people to feel a sense of belonging.

Activity Nodes

Activity nodes are smaller than local centres and may include features such as a bus stop, shops, and/or a community facility.

Comment: This is a poorly defined category, extending from a bus stop to a public toilet to a shop; again, there needs to be community consultation to determine community priorities.

4.3 Community facilities

Possible locations for five government schools (four in East Molonglo and one in Central Molonglo) _ are shown in Figure 3.1. It should be noted that community facilities are also permissible under both commercial and some residential land use policies.

Comment: Community facilities must be provided and included in costings (local shops, commercial premises for services such as doctors, dentists etc, community meeting rooms, library, etc - none of these have been provided for in Dunlop for example, with a population of 3000 and growing).

It is concerning if commercial organisations are made responsible for providing community facilities; there needs to be clarity about where government responsibility lies and the provision of community infrastructure must always fall to government as representative of peoples' aspirations.

4.4 Broadacre

The Greens oppose the development of West Molonglo and endorse measures to rehabilitate ecological communities there.

Broadacre land use policies are proposed for West Molonglo and that part of the central area currently occupied by the Pegasus Riding School and adjoining vineyards located close to Brake Brockman Drive.

Comment: That this area is planned for broadacre rather than residential development will not protect ecological values per se. Hobby farming will need to be tightly controlled to protect biodiversity and water quality; more thought must be given to the future of West Molonglo and for now, having been identified, plans should be put aside until earlier stages of development provide directions for future development.

4.5 Urban open space

Only major urban open space areas are shown on the map. Often small open spaces such as pocket parks near shopping centres, in residential areas and places for children to play safely together near homes are overlooked by planners and developers keen to turn every space into profit – but enhancing livability and providing places for trees and community gardens should be included in the design brief.

4.6 Major roads

Major roads land use policies apply to proposed arterial and collector roads

(higher order roads).

4.7 Public Land

The high value woodlands and grassland on the Kama property as well as the river corridor is designated on the map as public land. With community consultation, other areas must be identified as open space and appropriate protections set in place.

5. Proposed land use policies outside the defined land overlay

5.1 Community facilities

Existing institutions subject to the Broadacre land use policy in North Weston are proposed to be covered by a community facilities land use policy, to reflect the nature of existing uses. Existing community facilities and a site allocated for such uses (Block 15 Section 83 Weston) in North Weston are shown on the map (Figure 3.1) under community facilities land use policies. These include Orana School, Joint Defence Forces College, and the Bahá'í centre. There are considerations of moving the horticultural campus of CIT from its current site; in view of urban development where new gardens are being established, the expansion of this campus, with weekend courses in water-sensitive, ecologically appropriate gardens, rather than its relocation is in order.

The RSPCA is being moved, at great cost to the ACT Government, and its new location must be served by public transport to allow volunteers, so essential to the organizations activities, to easily visit.

5.2 Hills, ridges and buffer zones

NCA jealously guards the visual impact of unadorned hills and ridges (with some exceptions) and here ACTPLA endorses those principles:

The amendment of the Hills, Buffers and Ridges Spaces should ensure that the visual amenity of the hills of the Molonglo Valley is protected. The housing sprawl should not be visible as a continuance from Belconnen to Weston Creek, instead the Bush Capital valley concept needs to be retained.

Let's not have urban sprawl at all – views from other Canberra's vantage points should be as much a consideration as the view from Parliament House; Unfortunately, the views of a city where trees are the dominant visual features are already compromised by the kinds of development taking place currently in new suburbs.

In recognition of the Government's policy not to re-establish commercial pine plantations adjacent to urban areas, land abutting Cotter Road between North Weston and the slopes of Mount Stromlo are shown as hills, ridges and buffer areas land use policies rather than plantation forestry land use policies. The reseedling of wildling *pinus radiata* will be a problem for some time yet. Land uses that discourage this must be put in place, and efforts made to reclaim

open areas to grassy woodlands.

5.3 Light pollution and Mt Stromlo

There is no reference in the PA documents to the Light Impact Study (Vision Design 2006) study commissioned by ACTPLA and dated 2006. It is clear from this that the Mt Stromlo equipment was replaced by ANU after the fire in hope that new development would not add to light pollution. This is especially of note considering the amount of money being spent to get Mt Stromlo operational again.

The consultants propose a light limitation zone of 5 k minimum where specific planning principles are rigidly enforced: siting roads so that headlights point away from Mt Stromlo; Dense roadside and other strategic plantings to shield traffic and other light; light deflectors on street lights; and so on. These recommendations are not addressed in the PA documents and must be addressed. The telescope has claimed this site for many decades and places Canberra on the astronomical map. Future development must acknowledge and protect its requirements.

6. Land sales/ LDA

The Greens are concerned that the ACT Government's and ACTPLA's push for the development of the new township in general and big dam option in particular, may be simply because of what the government perceives as revenue-raising opportunities. This may be one of the reasons that the findings of environmental studies were given so little consideration in the documents we have before us.

It is evident that the land will be developed by both the LDA and through englobo land sales. Similar principles should apply to both, although they must be set in place in legal agreements and enforced. Lessons from earlier developments must be learned and best practice studied in other municipalities and there should be consultation with the advisory group mentioned earlier.

Recent activity suggests that the LDA is now placing itself more firmly in the role of land sellers and land developers, jumping to the industry's demands for 'more land now'. Whether this directly benefits first home buyers is yet to be determined; an adherence to the principles of affordable housing need to be spelt out and applied through, for instance, inclusionary zoning, with sustainable levels of public and community housing in the pepper and salt approach of NCDC days.

Solar orientation and water efficiency need to be considered at every stage of planning.

7. Water management

There are excellent measures proposed here, but most would be negated by the development and holding of water in a large dam.

The Greens commend:

- undertaking alternative water management measures to use the opportunity to ‘significantly improve the river corridor through water sensitive urban design (WSUD) measures, including water quality control ponds, wetlands and natural waterways’.
- Small primary treatment sewerage plants to capture sewer water for use in irrigation of parks, ovals and other public space and to consider reticulation of greywater from a public supply (in conjunction with or instead of recycling within individual households).
- Reduced hard surface coverage of the land to reduce water run-off.
(from ACTPLA info sheet)

8. Other issues

An important difference between the East, Central, and West Molonglo areas is the greater area of woodland habitat in the Central and East areas, and the greater connectedness with other woodland and grassland habitats, including the lower Molonglo River corridor (Biosis Research 2006). As a result of their habitat values for rare and threatened species, and their potential to support wildlife movement, the woodlands of Central and West Molonglo have considerably greater ecological value than the woodland fragments of East Molonglo (Biosis Research 2006).

The Murray-Darling Basin Agreement requires that any action that may significantly affect the flow, use, control or quality of any water in the upper River Murray and in the River Murray in South Australia must inform the Murray-Darling Basin Commission of the proposal, and provide the Commission with all information and data so the anticipated effect of the proposal can be assessed.

In accordance with the Agreement, the proposed lake on the lower Molonglo River may be required to undergo assessment through the Murray-Darling Basin Commission if it is deemed as having the potential to significantly affect the flow or quality of the lower Molonglo River, which is a tributary of the Murrumbidgee and Murray Rivers. ñ Very interested in the MDBC input, presume we will see this before referred to P& E Cíte.

As the ACT Government is keen for the ACT to be listed as a UNESCO Biosphere it must keep the values which underlie selection in mind as Molonglo is planned. This will include buffer zones around protected areas (ie. Kama woodland Aprasia riparian habitat)

9. Conclusion

All the concerns raised in my submission and by other people interested in the future of the Molonglo Valley indicate that further work is needed to ensure that development is sustainable – in every sense. This indicates a need for staged development, but with each stage up for review and not determined by decisions made now which may prove to be entirely inappropriate to our future world (climate change, declines in supply of oil and need for alternatives). To incorporate the sensible recommendations of ecologists, light specialists, social planners (and I see no evidence of their contribution to the PA documents) the process must be allowed to proceed at a pace that allows the best decisions at the time to be made.

Dr Deb Foskey
ACT Greens MLA

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