



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

Dear Committee Secretary

RE: Draft Variation to the Territory Plan No 257 – Suburb of Crace, Gungahlin (DV 257)

The Conservation Council of the South East Region and Canberra is Canberra's peak non-government environment organisation. As an umbrella organisation the council represents the interests of community and conservation organisations in the ACT and Australian Capital Region as well as the broader environmental interests of all the citizens of the ACT. The Council's mission is to achieve the highest quality environment for Canberra and the surrounding region.

The Conservation Council of the South-east Region and Canberra welcomes the opportunity to provide input to the Committee's Inquiry on DV 257. The Ginninderra Catchment Group has also been invited to provide comments to the Inquiry and we have incorporated their views and comments on several matters in this submission.

Loss of Yellow Box – Red Gum Trees

The Crace site has a significant number of large, mature eucalypts, Yellow Box (*Eucalyptus melliodora*) and Blakelys Red Gum (*E. blakelyi*).

A general planning principle (1.4.2) for Crace is that "*existing important trees should be incorporated into the urban fabric where possible*". It has been demonstrated across Canberra that this is a principle bound to fail unless the trees are well away from future houses, in public open space or reserve. The current plan of buffer and open space areas seems to incorporate straight lines and it would not appear that the boundaries were chosen to incorporate as many of the paddock trees as might have occurred with more careful planning. The Conservation Council recommends that this planning should be carefully reviewed by the Committee so that the most appropriate boundaries are determined. Unless carefully planned, the Crace proposal will result in a further loss of this valuable and threatened habitat element.

Paddock trees are a highly significant habitat resource. This is a local resource that has been subject to continuing destruction with the development of Gungahlin and Belconnen. This loss has been exacerbated by the fact that it has been the big hollow bearing trees on the flatter more fertile soils that have been cleared. Most of the trees left have been on the hill slopes and ridges, where they are smaller, relatively nutritionally poor, and supporting fewer and smaller hollows.

Yellow Box trees, in particular, provide a rich nectar source for birds, for example, this is one of the species relied upon by the threatened Regent Honeyeater (a nationally endangered species and an ACT endangered species). These birds are known to visit the ACT in small numbers, particularly in years when Yellow Box is in good flowering. There are records of the species breeding or attempting breeding from Mulligan's Flat and Goorooyarroo Nature Reserves in Gungahlin, and they are known to use paddock trees in flower.

A planning principle (1.4.2) is to incorporate ecological sustainability into Crace's planning. This necessitates an approach of "a net gain" in relation to the paddock tree resource. Ideally, the retention of the majority of trees, management of retained areas for regeneration or restoration of the overstorey and other species and secure protection should provide a biodiversity gain to at least match the loss caused by the development of the suburb.

New South Wales, Victoria and South Australia all administer "no net loss" vegetation schemes. Typically in the paddock tree example like Crace, they would require 10 paddock trees put under secure conservation management for every tree felled. The principle of sustainability dictates that such an approach be adopted for Crace. Certainly the local and recent destruction of the tree paddock resource is a significant threat to retaining the current biodiversity of the Gungahlin/Belconnen area.

Nature Reserve - Interface Issues

Adequate buffering and protection of the neighbouring Gungahlin Grasslands Nature Reserve and Gungahlin Hill should be a priority in this planning.

While we agree with some of the broad principles in the Draft Variation, there is little detail provided as to how the general principles will be applied, what the buffer will comprise, how wide the buffer will be, and how the interface will be managed to protect the values of the nature reserve and its flora and fauna.

In the General Planning Principles (1.4.2), it is stated that the development will *"ensure land uses adjacent to conservation areas do not have significant adverse impacts on threatened species"*. Later in Ecological Values (1.4.8) it is stated that *"the importance of the urban interface with the Gungahlin Grassland Nature Reserve will incorporate requirements for edge roads and stormwater measures to protect this area"*, and in Urban Edge Interface (1.4.9) the DV says *"it is important that the nature reserve is appropriately protected and buffered against potential threats from suburban development"*.

In order to achieve these principles, the Conservation Council and the Ginninderra Catchment Group believe the following measures would need to be implemented:

- 1) A ring road will need to be developed to ensure there are no houses backing directly onto the Nature Reserve (it is not clear from the current maps if this has been planned); the road should be part of a reasonable sized buffer area between the Reserve and houses.

- 2) Any buffers for fire protection of the new suburb or a fire management zone must be outside the Reserve area and should be incorporated into the new suburb planning.
- 3) Cat containment laws currently being implemented in Forde and Bonner to protect the Mulligan's Flat Nature Reserve should be applied also to Crace.
- 4) Adequate information should be given to; real estate agents, new residents and the landscape and garden maintenance industry, making them aware of the importance of the surrounding nature reserve and the need to contain domestic pets and minimise the spread of weeds.
- 5) The Government's urban management regimes will need to give priority to the ecological considerations of this area.

The Conservation Council has proposed some of these principles for managing the urban interface with Reserves on other development proposals where Reserve boundaries abut urban areas. The Conservation Council recommends that these principles should be incorporated in all future DVs of this nature.

Striped Legless Lizard – Delma impar

The Striped Legless Lizard is a grassland specialist, whose distribution is closely tied to the past distribution of natural temperate grassland. However, it is not a species that requires high quality native grassland to survive. It would appear that grassland structure rather than quality is important for the distribution of this species.

Populations are frequently recorded as occupying areas that include a mixture of native grassland and virtual monocultures of exotic pasture, and in a few cases have been recorded in areas only supporting exotic pasture. Striped Legless lizards have been found utilizing similar habitat to that within the variation area on the route of the current Federal Highway near the ACT border, within Kuma Nature Reserve, in lank and weedy grass near the Belconnen Naval Station, in the Jerrabomberra – Poplars area and in a phalaris paddock and compost heap in open woodland of Yellow Box and Blakley's Red Gum paddock trees near Yass.

The location of a population of the lizard in the adjacent Gungaharra Grassland Nature Reserve means that there is a strong possibility that part of the population could be utilizing the area of the proposed draft variation. This potential seems not to have been considered. It is important to determine whether adequate survey of the area has occurred, and to protect significant habitat elements that may still persist.

Management of Riparian areas and Stormwater run-off

A further area of concern to the Conservation Council and to the Ginninderra Catchment Group relates to the protection and management of riparian areas in the new suburb as well as the control of increased stormwater run-off.

In Stormwater Management (1.4.11) it is stated that *"to meet water quality and quantity requirements it will be necessary to retard and treat stormwater run-off on-site prior to it entering the main creek system"*.

Whilst this principle is supported, the Conservation Council and the Ginninderra

Catchment Group recommend that, as far as possible, the natural ecological values of existing creek lines within Crace be protected and enhanced rather than become degraded through the development process. This would necessitate the following:

- All stormwater detention ponds be built "off-line" i.e.; designed to collect, slow and filter excess flows prior to them entering the current creek lines and drainage channels.
- Drainage channels be left in as natural a state as possible and vegetation be used to slow and control excess flows (i.e., limited use of concrete lined channels).

It is noted that within section 1.4.11 it states "*Within the Crace site there are a number of sub-catchments with pronounced drainage lines, which are a major design driver for the planning of Crace*". Whilst the use of natural drainage areas as urban open space is supported, previous developments have not recognised the importance of these areas as wildlife habitat, and there is a need to place a higher value on the preservation and enhancement of the ecology rather than the creation of regularly mown parkland areas, often planted with invasive exotic species.

The composition and maintenance of Urban Open Space that complements rather than threatens native ecosystems will be of particular importance in this area due to its close proximity to the Gungaharra Grassland Reserve, Gungahlin Hill and the Ginninderra Creek Corridor.

Designing for solar access

Dwellings oriented for solar access will use less energy for heating and cooling. In the ACT correct orientation can make a very significant contribution to reducing energy consumption, and hence energy bills and greenhouse emissions. The ease with which dwellings can be designed to maximise solar access is directly related to the layout of the suburb. All new greenfields developments in the ACT should require that a maximum number of housing blocks are oriented to achieve solar access.

Representatives of the Conservation Council and GCG are available to meet with the Committee regarding these issues

Yours sincerely



Trish Harrup
Director
28 March 2006