



Friends of Grasslands

supporting native grassy ecosystems

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**Draft Variation No. 257 to the Territory Plan
Suburb of Crace Gungahlin**

Thank you for the invitation to make a submission on DV 275 to be considered by the Standing Committee shortly. Friends of Grasslands' comments are attached.

Kim Pullen
President

Draft Variation No. 257 to the Territory Plan Suburb of Crace Gungahlin

DV 257 was released by the ACT Planning and Land Authority in November 2005 with a closing date for comments by 19 December 2005. Friends of Grasslands (FOG) did not make a submission. On 7 March 2006, Hanna Jaireth, on behalf of the ACT Legislative Assembly's Standing Committee on Planning and Environment requested interested groups to make submissions on DV257 by 31 March. The following comments are provided by FOG.

Remnant yellow box red gum grassy woodland

The area of Crace has a number of large old yellow box and red gums, indicating that this was previously yellow box red gum grassy woodland, a threatened ecological community. However, the trees are regarded as *paddock trees*, i.e. single isolated trees with little or no native plant understorey and generally no regeneration of these trees. The latter is probably due to sheep grazing. In other parts of south-east Australia, these trees would be highly valued from a conservation perspective.

DV 257 states that:

Wherever possible these trees will be retained in open space, parks or roadside reserves or as part of the landscape setting for community purposes or other less intensive land uses. Where practicable, it is proposed that trees will be retained as large groups, which will also facilitate the provision for wildlife movement, particularly for birds across the suburb from the native forest habitat on Gungahlin Hill with the developing habitat on Percival Hill. Conservation of these trees will be addressed during the detail planning stage. However, it is noted that a tree survey and assessment, and a Draft Tree Management Plan have been prepared in accordance with the requirements of the Tree Protection (Interim Scheme) Act 2001 and all exceptional trees and wherever practicable high value trees are to be retained in either public open space or road reserves. The opportunity for developing an ecological corridor associated with the visual corridor on the east of the Barton Highway will also be explored as part of the detailed planning for the suburb.

FOG supports the proposals in DV257, but considers that more could be done both to protect the existing trees, to compensate for the loss of biodiversity, and to provide a more natural setting consistent with the setting of Crace adjacent to natural grassland and woodland.

FOG observes that in lowland areas of Canberra, the continued clearing of native vegetation for urban development leads to the loss of biodiversity. Recent work points out that each large tree is host to numerous invertebrate species, many of which we do not know about, as well as habitat to birds, including threatened species. Unlike the rest of mainland Australia, the ACT has no native vegetation legislation which would require those clearing native vegetation to provide offsets, either to enhance the habitat on site or elsewhere.

FOG believes that there needs to be a stronger intention to save as many trees as possible, especially groups of trees. This should take place as suggested in areas of open space, and open space areas should be designed as much as possible around existing trees. In open space areas, offsets can be provided to enhance biodiversity (compensate for biodiversity loss) by plantings of further trees and re-establishing native grasses and forbs that once would have occurred in the area. Consideration should also be given to creating wetland areas in open spaces designed to provide frog and invertebrate habitat. To date, many water design features in Canberra open spaces fail to encourage good biodiversity outcomes. Non indigenous vegetation should not be planted in open space areas so that residents can be reminded of the natural vegetation that exists in the area and thereby create a more empathetic attitude to important areas of grassland and woodland adjoining the suburb.

At present, in the ACT there are no tools to value biodiversity loss, although we can look to both NSW and Victoria who are much further advanced in this area for ideas. It is necessary that some measures of biodiversity loss should be developed so that plans to introduce suitable offsets can be considered. It is unlikely that the on-site offsets already described will adequately compensate for the loss of biodiversity that will occur in Crace and therefore consideration will need to be given to offsets elsewhere.

Proximity to Grace Grassland Reserve

DV 257 states that:

Crace is adjacent to the Gungaharra Grassland Nature Reserve (187ha), which is an important component of the conservation estate in the ACT containing key identified habitat for the Striped Legless Lizard, Golden Sun Moth and Perunga Grasshopper. The nature reserve also protects a small example of the interface between grassland and woodland on the southern slopes of Gungahlin Hill, near the Barton Highway.

The planning principles for Crace respect and recognise the importance of the urban interface with the Gungaharra Grassland Nature Reserve and will incorporate requirements for edge roads and stormwater measures to protect this area. These are detailed below in Section 2.3.9 (b) and importantly include the protection of the reserve from runoff from the proposed urban development with no drainage to occur within the Gungaharra catchment. In addition, as part of the buffer between the proposed residential development and the reserve a number of trees and an area that is showing signs of regenerating are to be retained forming a corridor in this part of the site that connects with Gungahlin Hill.

And further DV 257 states that:

The suburb of Crace has Gungaharra Grassland Nature Reserve adjacent to its eastern boundary. It is important that the nature reserve is appropriately protected and buffered against potential threats from suburban development, including weed invasion, dumping of rubbish and removal of plants. It is proposed that a buffer be established which will fulfil both conservation and fire management requirements.

FOG supports these recommendations but believes that more should be done. Following on from the theme of loss of biodiversity, FOG believes that the grassland reserves will suffer as a result of urban development adjacent to it. Not only should all the measures suggested by DV 257 be undertaken, but further actions should be taken not to encourage recreational use of the grassland reserve by residents, including dog walking even on leads. Cat controls (similar to those planned for Forde and Bonner) should be mandatory. As urban development will invariably lead to deterioration of the grassland reserve, consideration should be given to offsetting any biodiversity loss, and to creating an empathetic attitude by new residents.

Parts of the areas of Crace were once natural temperate grassland and habitat for threatened species of legless lizard, golden sun moth and Perunga grasshopper. Where former areas of natural temperate grassland coincide with proposed urban space, these areas should be revegetated with grasses and forbs using material available in the nearby reserve. This would have the effect of extending the reserve and its habitat values, and provide an offset to tree clearing. It would also facilitate a more empathetic view of grasslands and their inhabitants. Trees and shrubs should not be planted in such areas.

Management until Crace comes on line

It is not clear when Crace will be developed. Until such time, management of the area should ensure that it is not allowed to deteriorate (from threats such as weed invasion), and that planning and implementation of biodiversity maintenance and enhancement should take place.