Submission to Defence Housing Australia: Lawson North Development Public Consultation

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For further information:

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About the Conservation Council ACT Region

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

About Friends of Grasslands

Friends of Grasslands (FoG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FoG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. Its members include professional scientists, landowners, land managers and interested members of the public.

About the Ginninderra Catchment Group

Ginninderra Catchment Group's (GCG) mission is to 'connect, support and lead local communities to maintain and improve the health of the Ginninderra Catchment and surrounding environments'.

GCG is both a community-based natural resource management organisation and a Landcare network, operating primarily in the north-west ACT Region. GCG provides a network for our member groups and volunteers; linking the catchment community with the ACT Government and other stakeholders, providing assistance with project development and implementation, and facilitating community forums for ideas and discussion. Our organisation has demonstrated significant achievements in integrated environmental activities across all tenures (rural, urban and reserve) and landscape types in the ACT Region.

Introduction

We welcome this opportunity to provide some general feedback on the proposed development at Lawson North, cognisant that we don't yet have access to the full ecological assessments for the site, nor any proposed plan to offset the impact of the development, nor access to the site itself.

Thank you for the briefing that you offered the Conservation Council, Friends of Grasslands and Ginninderra Catchment Group on November 10th 2021 with regards to the revised master plan proposal at Lawson. We appreciate the time you took to take us through the proposal.

We oppose the master plan continuing in its most recent iteration due the destruction of nationally listed, critically endangered Natural Temperate Grasslands, and impacts on nationally listed critically endangered Box-Gum Grassy Woodland (BGGW). We also reject the notion that exploitation of these natural resources is necessary in order to fund the 150 dwellings required by the Department of Defence.

Impacts on Critically Endangered Ecological Communities

Natural Temperate Grassland (NTG)

Lawson North contains large areas of Natural Temperate Grasslands of the South Eastern Highlands (NTG), White Box Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grassland (Box-Gum Grassy Woodland or BGGW). Each of these ecological communities is listed as critically endangered under the EPBC Act, and under the ACT's Nature Conservation Act, 2014.[1]

Per Lawson North's Development Control Plan (DCP 12/09) NTG occurs throughout Precincts D and E (see Figure 1). The eastern parts of Precinct D contain arguably some of the most intact NTG left in the ACT. It contains dry Kangaroo Grass – Wallaby-grass – Snow-grass Moist Tussock Grassland, habitat for the Striped Legless Lizard, which occurs in the area. Precinct E contains Wallaby-grass – Tall Speargrass – Common Everlasting Tussock Grassland, which provides habitat for Golden Sun Moth.[2] The importance of Lawson Grasslands as NTG is represented in the ACT's Grassland Strategy, where the site is listed as one of the several relatively large areas of native grasslands left in the ACT (see Figures 4 and 5, pages 130-131 of the Strategy). In fact, it is one of only thirteen areas in the ACT that is over 100 ha, and is the

[1] Nature Conservation (Yellow Box – Blakely's Red Gum Grassy Woodland) Conservation Advice 2020;Natural Temperate Grassland of the South Eastern Highlands; White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland National Recovery Plan.

[2] Armstrong RC, Turner KD, McDougall KL, Rehwinkel R and Crooks JI (2013). Plant communities of the upper Murrumbidgee catchment in New South Wales and the Australian Capital Territory. Cunninghamia 13(1): 125-265.

largest area of NTG in Belconnen. The Grassland Strategy also states that the Lawson grassland is a “Key threatened species habitat” (per page 16).

Despite the significance of the NTG at Lawson North, the recently proposed master plan intends to destroy a large part of the ecological community in the eastern part of the site. We do not support the destruction of any NTG in pursuit of this development on account of its high conservation and environmental value. The Conservation Advice for the community states that any area of the community that meets minimum thresholds for the community is considered critical to its survival.

Box-Gum Grassy Woodland (BGGW)

BGGW, as listed nationally and in the ACT, occurs in two areas proposed for development; Precinct D and Precinct E of DCP 12/09 (see figure 1). The Precinct D woodland is largely intact BGGW. Over-the-fence surveys by FoG ecologists confirm that these patches meet the criteria for the ACT and Commonwealth-listed critically endangered ecological communities.These areas of BGGW are likely habitat for the vulnerable Scarlet Robin, White-winged Triller, Superb Parrot, and Gang-gang Cockatoo, all of which have been recorded nearby.

We support the master plan's preservation of BGGW, however we disagree with the sacrifice of NTG in order to support this. We also note that even though BGGW is not directly impacted by the development, it is likely that the proposed development will lead to increased fragmentation and increased edge effects, this is discussed further below.

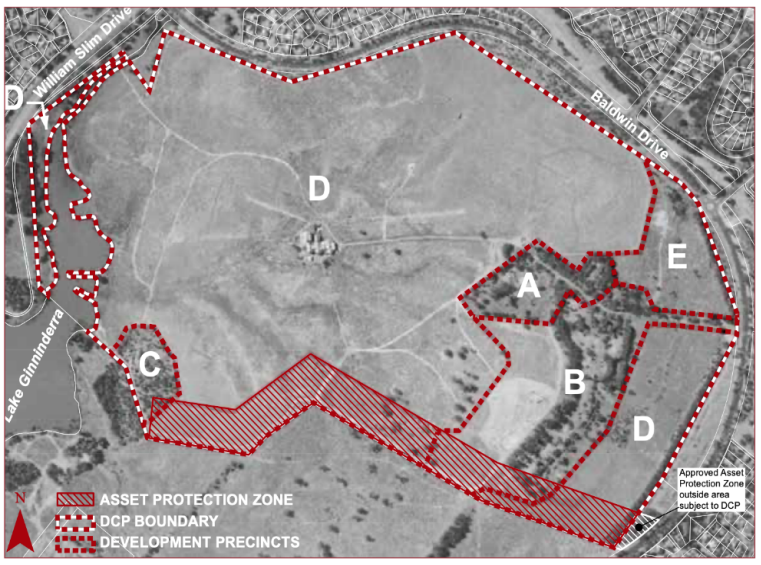

Figure 1: Map of Lawson Grasslands per DCP 12/09

Loss of Vulnerable and Rare Species

Over the fence surveys suggest that development at Lawson will, or is likely to impact on threatened species by removing or impacting the critically endangered ecosystems of NTG and BGGW as discussed above. In particular, any development at Lawson will have a severe impact on threatened and rare insects. Specifically, the Perunga Grasshopper, Key's Matchstick Grasshopper, Canberra Raspy Cricket, and Golden Sun Moth (GSM).

Threatened bird species have been recorded in the vicinity of the site and are likely to be impacted by development. These include Superb Parrot, Gang-gang Cockatoo, Scarlet Robin, White-winged Triller, Little Eagle, and Latham's Snipe. Additionally, there are a number of other threatened or declining species of birds that have been recorded nearby and are likely to use the BGGW in the area, specifically. Dusky Woodswallow, Flame Robin, Swift Parrot and Diamond Firetail.

Maintaining habitat for the threatened species as well as a number of declining species is of great significance in light of the current global extinction crisis.[3] Australia is one of seventeen 'mega-diverse' nations in the world, making our biodiversity internationally significant.[4] However, Australia has the unfortunate distinction of being a world in extinction and Eastern Australia is also globally recognised as a deforestation front.[5] As such, the ecosystems with high conservation values at Lawson are not just locally significant, but nationally. By destroying and degrading the critically endangered ecological communities at Lawson North the proposed development will also be destroying these species, pushing them ever closer to extinction.

Unnecessary Exploitation of Nature for Profit

DHA's function is to provide adequate and suitable housing for, and housing related services to: members of the Defence Force and their families, officers and employees of the Department of Defence and their families.[6] As indicated to us by DHA, to fulfill this purpose in the ACT, only an additional 150 dwellings are required, however the master plan proposes to build 416. The additional 266 dwellings will be sold to fund the project.

It might be possible for DHA to provide 150 dwellings at Lawson without harming the critically endangered natural environment by remaining in the confines of DCP 12/09. However, by seeking to build 266 additional houses the project encroaches on critically endangered ecological communities exploiting Canberra's natural resources.

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[3] See: Williams, K.J., Ford, A., Rosauer, D.F.,Silva, N.D., Mittermeier, R., Bruce, C., Margules, C. 2011. Forests of East Australia: the 35th biodiversity hotspot. In: Keith, D.A. (ed). Biodiversity hotspots, pp 295-310. Springer, Berlin, Heidelberg.

[4] Pacheco, P., Mo, K., Dudley, N., Shapiro, A., Aguilar-Amuchastegui, N., Ling, P.Y., Anderson, C. and Marx, A. 2021. Deforestation fronts: Drivers and responses in a changing world. WWF, Gland, Switzerland.

[5] Ibid.

[6] Defence Housing Australia Act 1987 (Cth), s5.

In addition, we note that DHA is developing 83 residences at Coombs in the Molonglo Valley. Only 20 of these are to be retained for Defence personnel, and 63 are to be sold on the open market. Clearly this also reinforces that DHA's business model is about returning development profits back to Defence Housing resources, rather than the core business of ensuring suitable housing for Defence personnel.

We strongly disagree with the exploitation of Canberra's nature to fund the Department of Defence's housing requirements. We note that the Department of Defence has received $44.6 Billion in the most recent federal budget. This represents a substantial 2.1% of the national GDP. Considering the financial resources of the Department of Defence, we do not consider it necessary to fund housing for personnel by profiting off the destruction of Canberra's natural resources.

Acting Against Conservation Planning

The NCA's Development Control Plan (DCP 12/09) boundaries (ie. areas identified primarily for conservation) are not aligned with the areas identified for reservation in this development proposal (ie. development zones appear to encroach on the conservation zones that were defined). In order for DHA's development to proceed, this DCP will have to be altered to allow for development to encroach on areas with high conservation value.

We note that DHA were aware of the confines placed upon a proposed development when they bought the land in 2017 (as the DCP was confirmed in 2013). Prudent business by DHA should have considered the economic viability of developing Lawson North prior to acquisition. We do not support the revision of DCP12/09 as it is an accurate representation of the environmental and heritage values at the site. If DHA were unable to profit off the land with relevant planning approvals, then they should not have bought it. Permitting environmental degradation by revising DCP12/09 is not a solution to poor business management.

Inadequate Buffer Zones

The Conservation Advice for NTG recommends a minimum buffer zone of 30 metres from the edge of a patch, and larger buffer zones may be applied, where practical, to protect patches that are of particularly high conservation value, if patches are down slope of drainage lines, or a source of nutrient enrichment.[7] The proposed development provides for a 30m buffer around a mere 25% of the site, leaving the other 75% vulnerable to degradation from edge effects.

If the development is to proceed then a minimum 30m should be planned around all relevant edges of the site. Failing to do this will lead to increased degradation of the remaining NTG and BGGW, further harming the threatened and rare flora and fauna that inhabit the area.

[7] Nature Conservation (Yellow Box – Blakely's Red Gum Grassy Woodland) Conservation Advice 2020;Natural Temperate Grassland of the South Eastern Highlands; White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland National Recovery Plan; Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) (s266B) Approved Conservation Advice (including listing advice) for the Natural Temperate Grassland of the South Eastern Highlands (EC 152), 2016.

Summary

We hope that these thoughts are helpful in guiding your work in regards to this site. In summary, we remain significantly concerned about the proposed development and are yet to be convinced that locating an extensive urban area at Lawson North would be tenable given the significant ecological values.