

# Conservation Council ACT Region submission on Stage 2: Development proposed at 722 Canberra Ave Jerrabomberra (DA202544243)

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The Conservation Council ACT Region (the Council) is pleased to provide comment on the above proposal.

The Council is the leading environmental advocacy organisation in Canberra and hub for over 40 community groups. Our mission is to protect nature and safeguard ecosystems in the ACT and region. We also support broader initiatives to counter regional and global climate change.

We are a non-profit, non-government organisation that runs campaigns, promotes and upskills local groups, undertakes research, advocates passionately, and engages and informs our community.

## Our comment

Acknowledging some new information has been provided and there are some changes to the design, the Council continues to hold significant concerns about the proposal's environmental impacts which will affect nature and the local community including First Peoples' cultural heritage.

Friends of Grasslands Inc (**FOG**) has noted in its submission on this Stage 2 that:

the proposal will have significant direct and indirect impacts on one of Australia's most important remnants of Natural Temperate Grassland (**NTG**). It is inappropriate and poor planning to plonk intensive small lot

industrial use as a northern enclave into the nationally important grassland and the habitat it provides to threatened species.<sup>1</sup>

We support the submission by FOG.

There is not enough information in the DA paperwork to justify the approval of DA202544243 at this stage. Many of the missing items set out in the Attachment are fundamental, up-front matters that go to safety, servicing, environmental protection and statutory compliance. Several appear to be mandatory requirements; they are not issues that should be deferred to conditions.

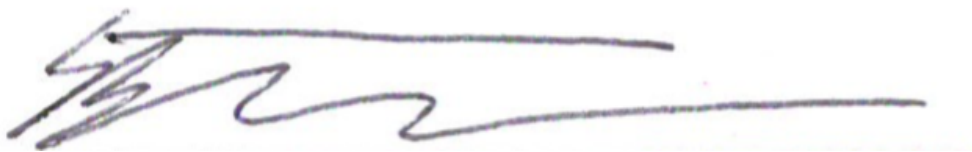
The Council respectfully submits that these matters should be published and public comment invited before any approval is considered.

The Council request that:

- a) the Territory Planning Authority does not approve DA-202544243 until the missing information outlined above is published and public comment is invited or the information is accepted by the responsible agencies (as appropriate)
- b) If the proponent makes material changes to address these issues, the DA is re-presented so the community has a fair opportunity to review and respond to the updated information.

Thank you for considering this submission.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Simon Copland', written over a horizontal line.

Dr Simon Copland  
Chief Executive, Conservation Council ACT Region

19 November 2025

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<sup>1</sup> <https://www.fog.org.au/Submissions/20251117.htm>

## **Attachment**

### **1. Planning Act 2023 (ACT) – decision timing and adequacy**

The Council considers the proponent's follow-up information provided to inform a design review inadequate for a 'Significant DA'; we recommend decision time is paused until an adequate response is given. There appears insufficient evidence demonstrating how the further information request has been considered.

### **2. Aviation safeguarding – Airports Act/Regulations; NASF Guidelines C and E**

In the DA paperwork, there appears to be no:

- a) obstacle/airspace assessment at AHD for all structures and cranes;
- b) signed photometric tables demonstrating compliance with NASF Guideline E
- c) wildlife-attractant assessment or engineered controls under NASF Guideline C.

### **3. National Capital Authority – National Capital Plan and Canberra Avenue corridor**

In the DA paperwork, there appears to be no:

- a) Works Approval lodgement or decision from the National Capital Authority
- b) completed DCP 19/01 checklist.

### **4. Heritage – Heritage Act 2004 (ACT)**

In the DA paperwork, there appears to be no:

- a) evidence of any Council endorsement
- b) excavation permit and approved methodology
- c) subsurface testing outcomes
- d) Statement of Heritage Effect
- e) Unexpected Discovery protocol including roles and authority.

### **5. Environmental pathway – ESO/EIS and EPBC Act**

The Council understands this Significant DA is of a type described in Item 16 of Schedule 1 of the *Planning (General) Regulation 2023 (ACT)*. In the absence of environmental significance opinion from the Conservator of Flora and Fauna, indicating that the proposal is not likely to have a significant adverse environmental impact, we would expect to see an Environmental Impact Statement.

It is not clear whether the proponent has considered their obligations to refer the proposal to the Federal Environment Minister for a decision on whether an

assessment and approval is required under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth). The Council can find no record of a decision that the proposal is not a controlled action.

The Council questions whether this Significant DA is also of a type described in Item 21 of Schedule 1 of the *Planning (General) Regulation 2023* (ACT). In the absence of environmental significance opinion from the Heritage Council, indicating that the proposal is not likely to have a significant adverse environmental impact, we would expect to see an Environmental Impact Statement against this criterion also.

## **6. Bushfire – ACT Bushfire Management Standards**

We understand the ACT Bushfire Management Standards (Section 5) require, amongst other things:

- a) Access width and grades for fire appliances;
- b) Hydrant spacing, flow and pressure; and
- c) Asset Protection Zone (APZ) geometry and treatment.

In the DA paperwork, there appears to be no certified bushfire package demonstrating compliance along every relevant perimeter interface, supported by drawing references.

## **7. Stormwater, on-site detention and acceptance**

We understand the current Municipal infrastructure design standards (MIS) include requirements such as:

- a) an Operation and Maintenance (O&M) Plan prepared and submitted for approval
- b) hydrological method/model details and tabulated pre- and post-development flow comparisons
- c) no increase in peak outflows
- d) demonstration of downstream capacity and legal point of discharge
- e) relief spillways and designated overland flow paths
- f) a 100 per cent blockage scenario assessment
- g) Works as Executed (WAE)/as-constructed records and acceptance preconditions.

In the DA paperwork, there appears to be no:

- a) O&M plan or evidence of its approval pathway
- b) pre- and post-development flow tables

- c) downstream capacity or legal point of discharge statement
- d) identified relief-spillway/overland flow routing or 100% blockage assessment
- e) WAE/acceptance pathway documentation.

Before a decision is made, the DA file should include the full MIS-08 stormwater and OSD package, including:

- a) the O&M plan;
- b) the hydrological model inputs and parameters;
- c) tabulated pre- and post-development flows;
- d) downstream capacity checks and legal point of discharge confirmation;
- e) failure mode/100% blockage checks; and
- f) the proposed WAE/as-constructed and acceptance pathway.

## **8. Utilities (Evoenergy) and Water (Icon Water)**

Key utility requirements include:

- a) Evoenergy Service & Installation Rules and drawings (including 3832-018/3811-004) for padmount clear zones (7 m), 1.5 m access, meter/point-of-entry siting, and 24/7 access easements or covenants; and
- b) Icon Water in-principle acceptance and any augmentation triggers.

In the DA paperwork, there appears to be no:

- a) a clear, plan-level utility overlay demonstrating compliance with Evoenergy's and Icon Water's constraints
- b) acceptance or in-principle support letters from Evoenergy and Icon Water.

Before any approval is considered, the DA paperwork should include and comment be invited on:

- a) a utilities overlay drawing set showing compliance with padmount clear zones, access, metering and easements
- b) Evoenergy and Icon Water acceptance letters (or equivalent written approvals).

## **9. Traffic and access**

For a proposal of this scale, the Council considers a Traffic Impact Assessment (TIA) should include:

- a) Model inputs, calibration and validation
- b) Peak-period and scenario logic
- c) Heavy-vehicle and emergency-vehicle swept paths
- d) Any agreed off-site works and access arrangements.

In the DA paperwork, there appears to be no:

- a) accepted TIA
- b) documented off-site works agreements.

These should be made and public comment invited before approval

## **10. EPA construction and contamination management**

Under the *Environment Protection Act 1997 (ACT)* and the *EPA Guidelines for Construction and Land Development (Aug 2022)*, the following should be clear:

- a) construction erosion and sediment controls that achieve  $\leq 60$  mg/L TSS, including dosing/settlement, dust and adjacent-road cleaning measures, and monitoring responsibilities
- b) any contamination assessment and Waste and Resource Management Plan (WRMP).

In the DA paperwork, there appears to be no:

- a) codified Erosion and Sediment Control Plan (ESCP) that sets out mg/L regimes, dosing/settlement, dust and road-cleaning measures and monitoring responsibilities
- b) contamination assessment
- c) WRMP.

These documents, including responsibility and monitoring arrangements, should be published and comment invited before any approval is granted.

## **11. Defence and visual impact (as applicable)**

Where Defence interests or significant public interfaces are potentially affected, it would be reasonable to expect:

- a) Defence engagement outcomes (if relevant)
- b) a proportionate visual impact assessment for significant public frontages.

In the DA paperwork, there appears to be no:

- a) Defence engagement outcome
- b) visual impact assessment.

These documents should be published and comment invited before any approval is granted.