



**CONSERVATION
COUNCIL** ACT REGION

Submission to Territory Planning Authority

Draft Plan Amendment 14 – Belconnen green waste recycling facility and bulk landscape supplies

20 July 2026

The Conservation Council ACT Region (Council) is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

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Introduction

The Council appreciates the opportunity to comment on Draft Plan Amendment 14 – Belconnen green waste recycling facility and bulk landscape supplies (DPA-14). We note the leaseholders of Block 1634 are supportive of the Council's submission.

In DPA-14, the Territory Planning Authority (TPA) proposes to amend the 'Land Use Table' within the *Belconnen District Policy* to include 'recycling facility' and 'bulk landscape supplies' as forms of 'assessable development' that may, on subsequent approval, be allowed within Block 1653 – a 5.08 hectare (ha) rural block in southwest Belconnen. Block 1653 lies within Central Molonglo, in the Western Edge Investigation Area (WEIA). Its location is shown at Figures 1-4 in Attachment A.

The Council recognises that Block 1653 itself is a degraded former vineyard of low ecological value. We also recognise there is a significant need for a new green waste recycling facility in North Canberra and are supportive of the recycling, mulching and composting services a new green waste facility will provide.

However, our concern is that DPA-14 and its supporting documents fail to acknowledge the broader spatial and ecological context of the surrounding area, which includes sensitive ecological communities and the Molonglo River downstream of the site. The ecological advice relied on for DPA-14 contains no assessment against the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), despite several potential matters of national environmental significance in the immediate vicinity.

The Council remains deeply concerned that the ACT Government is pushing forward with permanent industrial infrastructure development in the WEIA, when it has also stated 'there has been no Government decision made as to whether any development will proceed in the WEIA,'¹ and is yet to develop a landscape plan for the ACT.

We are concerned about the cumulative impact of what could follow — multiple incremental development proposals in the Western Edge, in which DPA-14, as the first, 'opens up' the Central Molonglo area. This is not effective landscape planning, disregarding what exists and is at risk beyond Block 1653. This is an area where farmers make a living, and is a haven for our critically endangered Box-Gum Grassy Woodland and iconic wildlife.

The proposed amendment puts at risk:

- rural livelihoods, as there is leasehold land dedicated to productive rural enterprise in Central Molonglo
- the natural environment – including surrounding Box-Gum Woodland that surrounds Block 1653, and the Molonglo River
- the open space values outlined in the National Capital Open Space System (NCOSS), which are of increasing importance to the residents of Belconnen and Molonglo as these adjacent areas continue to expand.²

¹ ACT Government (online) *Western edge investigation*, www.planning.act.gov.au/planning-projects/western-edge-investigation, viewed 17 July 2026

² Seddon, G. (1977) *An open space system for Canberra*, Technical Paper No. 23, a policy review prepared for the National Capital Development Commission, www.nca.gov.au/sites/default/files/publication-documents/George%20Seddon%27s%20An%20Open%20Space%20System%20for%20Canberra%20technical%20paper%2023-%201977.pdf, pp. 32-33

Recommendations

The Council makes the following recommendations:

Recommendation 1 – That DPA-14 be refused and other alternative sites be considered.

DPA-14 should be refused while WEIA investigations are ongoing and a landscape plan is being developed for the ACT. DPA-14 is inconsistent with the ACT Government's own commitments, relies on inadequate assessment, and proposes a land use that is unsuited to the site.

The ACT Government should seek an alternative site location for the green waste facility. Our reasons are summarised below and set out in detail in this submission.

Recommendation 2 – If DPA-14 is not refused, that it be referred to the Standing Committee on Environment and Planning for inquiry before any further step is taken.

The terms of reference should examine:

1. whether the land use proposed in DPA-14 for Block 1653 is consistent with the ACT Government's decision to remove Central Molonglo 'in perpetuity' from consideration as a future urban area; and with its identification in the *Belconnen District Strategy* (2023) as part of the city's blue-green network.
2. whether the proposed use of Block 1653 is a 'split referral' likely to frustrate the objects of the EPBC Act.³

The committee's report should be completed and published before any further step is taken.

Recommendation 3 – That the TPA seek the advice on which the National Capital Authority (NCA) has relied, sufficient to demonstrate DPA-14 is consistent with the *National Capital Plan*.

The TPA should also confirm the precise *National Capital Plan* land classification of Block 1653 and adjacent blocks in Central Molonglo.

Recommendation 4 – That in preparing, publishing and inviting comments on its proposals, the TPA have regard to the audience.

In line with the principles of good consultation,⁴ information presented should be meaningful, transparent and understandable. This proposal falls short on all three.

The detail in this submission covers points of concern about the proposal, including insufficient context and process. To inform this submission, we have included maps in Attachment A.

³ *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), www.legislation.gov.au/C2004A00485/latest/text; (2013) *EPBC Act Policy Statement Staged Developments—Split referrals: Section 74A of the EPBC Act*, www.dcceew.gov.au/sites/default/files/documents/epbc-act-policy-staged-developments.pdf

⁴ *Planning Act 2023* (ACT), s 11

Summary

We submit that DPA-14 should be refused, or at the very least deferred until WEIA investigations are complete, for the following reasons:

1. The proposal is inconsistent with the ACT Government's commitment to not make any decisions about development in the Western Edge until investigations are completed.
 - a. The proposal is inconsistent with the Government's additional commitment to not undertake any urban development in Central Molonglo. The proposal anticipates a form of land use normally confined to urban industrial areas, in a landscape protected by the NCOSS.
 - b. The absence of context denies the public and the National Environment Protection Agency any awareness, let alone any understanding, of what development proposed in Central Molonglo in the short to medium term. The approach will thereby frustrate the objects of the EPBC Act by ignoring the cumulative impact of what is likely to follow, i.e., multiple one-off proposals where the first 'opens up' an area with a road.
2. DPA-14's ecological advice notes "areas of remnant vegetation" exist in the vicinity of Block 1653⁵; what is *not* mentioned is Block 1653 is almost completely surrounded – to an extent of around 300 degrees – by 'sensitive ecological communities'⁶ in the form of 'potential threatened woodland'.⁷ That threatened woodland is likely to be the ecological community 'White Box–Yellow Box–Blakely's Red Gum Grassy Woodland and Derived Native Grassland' which is listed as threatened, under the EPBC Act, at the level of Critically Endangered (Box-Gum Woodland). Those values have not been surveyed nor assessed against the National Capital Plan or under the EPBC Act.
3. Block 1653 is steep and would require significant earthworks⁸, increasing the risk of erosion and sediment run-off into the Molonglo River. A permanent facility generating leachate, dust and weed propagules in this location engages the general environmental duty under the *Environment Protection Act 1997* (ACT)⁹ and the water-quality objectives of the Murray-Darling Basin.
4. The evidence base in attachments to DPA-14 assesses the wrong land and the wrong period. The *Ecological Advice*¹⁰, the *Aboriginal Cultural Heritage Assessment*¹¹ and the

⁵ Territory Planning Authority (TPA) (2026) *Supporting Report* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0003/3078660/Supporting-Report.pdf, p. 6

⁶ ACT Government (2023) *Belconnen District Strategy*, www.planning.act.gov.au/__data/assets/pdf_file/0010/2324683/district-strategies-2023-volume-2-district-strategies-belconnen.pdf, Figure 8 on p. 15

⁷ ACTmapi (online) *ACT Potential Threatened Woodland*, https://services1.arcgis.com/E5n4f1VY84i0xSjy/arcgis/rest/services/ACTGOV_Woodland_Threatened/FeatureServer

⁸ Cardno (2022) *Feasibility Study – Mitchell RMC and Identification of Future Waste Sites in North Canberra: Design Options Study* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0011/3079937/5a93ff846e799fc184cc9b804f8044bb1063f48d.pdf, p. 25

⁹ *Environment Protection Act 1997*, www.legislation.act.gov.au/View/a/1997-92/current/html/1997-92.html

¹⁰ Capital Ecology (2021) *Ecological Advice* attached to DPA-14, report to Ginninderry titled "The Vines" (Block 1582), Belconnen, www.planning.act.gov.au/__data/assets/pdf_file/0012/3079938/85b7b26b55bff114d80375066ea52c5cfa66e0ea.pdf

¹¹ Past Traces (2021) *Aboriginal Cultural Heritage Assessment* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0004/3079939/22f0c640469f427f07063b2f132b8db9dd5d5ac4.pdf

National Capital Authority's agreement¹² all describe all or part of Block 1582. The block proposed for rezoning, Block 1653, does not appear in any of these documents. The *Traffic Assessment* was for a proposal for a temporary, i.e., not a permanent, development.¹³

5. The amendment may have no legal effect. Under s 26 of the *Australian Capital Territory (Planning and Land Management) Act 1988* (Cth) (PALM Act), the Territory Plan has no effect to the extent it is inconsistent with the *National Capital Plan*.¹⁴ A permanent recycling and bulk-landscape-supplies operation are not permitted uses in the *National Capital Plan*'s broadacre and open-space categories.¹⁵
6. The proposal is to make permanent a temporary use that was initially refused. The TPA refused the original development application for multiple reasons. Among these reasons, the use proposed was:
 - a. "inconsistent with a Temporary use" – site hardening, for example, would have had irreversible impacts¹⁶
 - b. "not considered suitable for the land"¹⁷
 - c. a recycling facility – "facilities of this nature are prohibited within the NUZ1 zone."¹⁸

DPA-14 seeks to remove that obstacle by rewriting the *Belconnen District Policy*.

7. The processes involved are flawed: consistency with the ACT Planning Strategy is asserted but not demonstrated; future pollution and heritage approvals are pre-judged; and the NCA's agreement was obtained without community consultation.

¹² National Capital Authority (NCA) (13 Feb 2026) *Response letter to the Suburban Land Authority* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0010/3079936/6857e689a045980dc0836dda6831e2ec78179949.pdf

¹³ Calibre Professional Services (2022) *Report: Canberra Sand and Gravel–Traffic Impact Assessment*, Report prepared for Riverview Projects, www.planning.act.gov.au/__data/assets/pdf_file/0006/3079941/8853855e9a064be2c20e80e5554b38ed06bfd7a1.pdf

¹⁴ *Australian Capital Territory (Planning and Land Management) Act 1988* (PALM Act), www.legislation.gov.au/C2004A03701/latest/text

¹⁵ NCA n 12 (*Response letter to the SLA*)

¹⁶ *Notice of Decision to Refuse DA202240118* (1 September 2022), <https://dafinder.blob.core.windows.net/dadocuments/DOCs/NOTICEOFDECISION-202240118-SIGNED.pdf>, p. 2; see also *Notice of Decision on Reconsideration for DA202240118* (3 August 2023), unpublished, p. 2

¹⁷ *Notice of Decision to Refuse DA202240118 n 16*, p. 3; see also *Notice of Decision on Reconsideration for DA202240118 n 16*, p. 4

¹⁸ *Notice of Decision to Refuse DA202240118 n 16*, p. 3

Detailed Views

Inconsistency with ACT Government commitments: the WEIA and Central Molonglo

There is an omission of contextual information in DPA-14 and its attachments about the broader context of Block 1653. At increasing scales, DPA-14 provides no information about:

- blocks in the immediate vicinity of the Broadacre land in Central Molonglo, i.e., about the values of blocks adjacent to blocks 1653 and 1582
- Central Molonglo
- the Western Edge Investigation Area.

The *ACT Planning Strategy* states the ACT Government will investigate urban development options in the Western Edge Investigation Area “excluding Central Molonglo”¹⁹, i.e., the *ACT Planning Strategy* does not include for Central Molonglo this form of development which is ordinarily confined to urban-industrial settings.

The Council does not consider it acceptable for this proposal to proceed contrary to the *ACT Planning Strategy*. Despite the Government’s intentions to develop a landscape plan for the ACT, we remain concerned that the ACT community is going to find out that development that is planned in the Western Edge one planning amendment or proposal at a time.

Central Molonglo

Block 1653 (5.08 ha) lies within ‘Central Molonglo’ ([Figure 3](#)). Central Molonglo covers around 1164 ha. The *Supporting Report* mentions the surrounding area’s environmental values, however, the explanation is cursory at best:

*The District Strategy identifies the area surrounding the site as ecologically significant to be retained to protect environmental and heritage values, as well as broader landscape character.*²⁰

The *Belconnen District Policy* includes an outcome “Protect and enhance woodland values between Aranda Bushland and Woodstock nature reserves.”²¹ The woodland between these terrestrial protected areas is shown in [Figure 4](#). Block 1653 is located within the yellow oval shape. The areas of woodland that are protected are shaded green. Block 1653 lies amidst woodland that is not a protected area.

The ACT Government has previously committed to remove Central Molonglo *in perpetuity* from consideration as a future urban area:

- Prior to September 2007, Block 1582 was zoned ‘Hills, Ridges and Buffers’ ([Figure 5](#)). When public comment was invited on Draft Variation 281 to the Territory Plan, and with interim effect from 28 April 2008, the then ACT Planning and Land Authority (ACTPLA, now the TPA) proposed changing: Block 1582 to Broadacre Area, which occurred on 9 Oct 2008; and much of the rest of Central Molonglo to ‘Residential’, which did not eventually occur ([Figure 6](#)).

¹⁹ ACT Government (2018) *ACT Planning Strategy*, www.act.gov.au/__data/assets/pdf_file/0003/2346276/2018-act-planning-strategy.pdf, section 1.2.1 on p. 45, underline added

²⁰ TPA n 5 (Supporting Report), p. 11

²¹ ACT Government (1 July 2026) *Belconnen District Policy* (NI2023-540), www.legislation.act.gov.au/DownloadFile/ni/2023-540/copy/182874/PDF/2023-540.PDF, ‘Desired Policy Outcome’ number 1 on p. 5

- On 18 August 2008, the former Planning Minister (who is now the Chief Minister):
 - approved Variation 281 to the Territory Plan under s 76(3) of the *Planning and Development Act 2007* (ACT) (Variation 281)²²
 - tabled a report by the Standing Committee for Planning and Environment in support of Variation 281, and in doing so noted in the Tabling Statement that the “Committee’s fourth recommendation is that Central Molonglo be removed in perpetuity from being considered as a future urban area”²³
 - directed the ACTPLA to “Vary the ... Territory Plan map to remove Central Molonglo in perpetuity from being considered as a future urban area.”²⁴
- Just prior to those decisions, the NCA had based *its* decision to oppose urban development in Central Molonglo on an independent environmental review report prepared by NGH Environmental, funded jointly by the NCA and the TPA.²⁵ It is understood this report recommended woodland within Central Molonglo be preserved to provide for the retention of vegetation and ecological communities in the more sensitive localities.²⁶
- In a report on its investigations and consultation with stakeholders concerning Draft Amendment 63 to the *National Capital Plan*, the NCA wrote:
 - *On 29 May 2008 the [NCA] considered the removal of central Molonglo from Urban Areas. The [NCA] agreed to the removal of central Molonglo on the basis of the [NGH Environmental] report. This position was reaffirmed on 8 July 2008. The independent environmental review ... will be available on the NCA website.*²⁷
- The report is not (or is no longer) available on the NCA website.

SLA Development Intentions in Central Molonglo

In December 2025, the SLA advised the Council it had invited consultants to tender for a “planning and engineering consultancy to prepare Subdivision Development Applications” for blocks 1582 and 1600 Belconnen.²⁸ The advice noted “development is intended to accommodate a mixture of commercial premises and community services, not residential development.”²⁹ Soon after, a tender document appeared on a Facebook page showing

²² *Planning and Development Act 2007* (repealed),

www.legislation.act.gov.au/View/a/2007-24/20231127-82545/html/2007-24.html; *Planning and Development (Plan Variation No 281) Notice 2008*, NI2008-352, www.legislation.act.gov.au/ni/2008-352/

²³ Legislative Assembly (19 Aug 2008) *Tabling Statement: Variation No. 281 to the Territory Plan: Molonglo and North Weston*, www.parliament.act.gov.au/_data/assets/pdf_file/0006/380607/6th_PE_36_DV281.pdf, p. 5

²⁴ *Planning and Development (Plan Variation No 281) Direction 2008 Molonglo and North Weston* (NI2008 351), www.legislation.act.gov.au/View/ni/2008-351/20080822-37459/PDF/2008-351.PDF, point 3 in Annexe A

²⁵ NCA (2008) *Report on Consultation National Capital Plan Draft Amendment 63 – Molonglo & North Weston*, www.nca.gov.au/sites/default/files/amendments/Draft%20Amendment63_Report_on_Consultation_May2008.pdf, p. 16; Note: This report abbreviates the NCA to the ‘NCA’ (p. 3), and what is now the TPA to ‘ACTPLA’ (p. 4). In the quote that is included under this sub-heading, the word replaced inside the brackets is ‘Authority’. It is assumed here that the ‘Authority’ referred to is the NCA. This is based on other references to ‘the Authority’ throughout the NCA’s report on its consultation, e.g., “Special Requirements of the [National Capital] Plan currently apply to the Molonglo River Corridor, and development within the Molonglo River Corridor is to be in accordance with a Development Control Plan (DCP) agreed by the Authority” (p. 13), underline added.

²⁶ NCA n 25 (Report on Consultation over Draft National Capital Plan Amendment 63), p. 17

²⁷ *Ibid*, underline added

²⁸ Email from the SLA to the Council dated 10 December 2025, unpublished.

²⁹ *Ibid*.

preliminary plans for community services include a school, church and retirement living area (Figure 7).³⁰ By 22 January 2026, the plan may have changed. On this date, the SLA wrote to the NCA explaining its proposed use of Block 1582 was as a green waste facility.

Attaching the Cardno *Design Options Study* comprising a feasibility study of resource management centre options ‘begs a question’ that, unhelpfully, the TPA’s DPA-14 paperwork does not answer. The TPA does not state what option the TPA is pursuing for blocks 1582 or 1600. The Cardno *Design Options Study* includes the option to co-locate and operate a resource management centre like the Mugga Lane Resource Management Centre in Symonston on block 1634 which is not Broadacre land but ‘Hills, Ridges and Buffers’.

Inconsistency with the *National Capital Plan*

Section 26 of the PALM Act provides that “the Territory Plan has no effect to the extent that it is inconsistent with the *National Capital Plan*”. This is a Commonwealth over-ride that no Territory process can cure.

The permitted uses in the *National Capital Plan*’s non-urban categories — the NCOSS and Broadacre — are limited to purposes such as agriculture, forestry, nature conservation, recreation, parks, public utilities and, at most, retail plant nurseries. Waste facilities, recycling and industrial uses do not appear on those permitted-use lists. In the *National Capital Plan*, industry is confined to designated estates *within urban areas*. We submit that a permanent commercial recycling and bulk-landscape-supplies facility on non-urban land is inconsistent with the *National Capital Plan*.

We understand the NCA’s letter records agreement to a use of Block 1582; however, we note the letter merely recites the “not inconsistent” test without giving reasons. If enabling this use in fact requires an amendment to the *National Capital Plan* itself — as occurred for Central Molonglo through Amendment 63 in 2008 — that is a matter for the NCA’s formal amendment process, including tabling for disallowance in the Australian Parliament.

We recommend that the TPA seek the legal advice on which the NCA relied, sufficient to demonstrate DPA-14 is consistent with the *National Capital Plan*, and to confirm the precise *National Capital Plan* land classification of Block 1653.

Inconsistency with the NCOSS (National Capital Open Space System)

The NCOSS, safeguarded by the NCA, recognises the “importance of the natural setting”³¹, which includes space that “separates individual towns yet binds the whole together into the city of Canberra.”³² The NCA explains, “closely associated with the NCOSS are the Territory’s rural lands which also contribute significantly to the landscape setting.”³³

The Council met with officials from the NCA in July 2026 and asked if the NCA had any intention to more-precisely define the NCOSS between the suburbs of Whitlam (in Molonglo) and

³⁰ Belconnen Community Council (3 Mar 26) *Post*, www.facebook.com/belcouncil/posts/pfbid02tahL1k9ydmazwmXmUKdkkhJx1aZMnDmdP7ndioaSgBteZkpL3DStH7ngRkbhYI, viewed 1 May 2026 and 12 July 2026

³¹ NCA (2021) *National Capital Plan*, www.nca.gov.au/sites/default/files/National%20Capital%20Plan_rev%20April%202021.pdf, p. 24

³² NCA n 31 (publication titled *National Capital Plan*), p. 12

³³ NCA n 31 (publication titled *National Capital Plan*), p. 24

Strathnairn (in Belconnen). As the city expands, and if Central Molonglo is developed, Molonglo and Belconnen will 'get closer together' on a much wider front adjacent to the lower Molonglo River.

Recalling from above, the TPA was *directed* to rule out urban development in Central Molonglo *in perpetuity*, after concerns were raised by the NCA. Against that history, it is not appropriate that the ACT Government is now proposing urban development that will open up Central Molonglo *without* explaining the context, nor that the NCA has given an agreement *without* public consultation and *without* due consideration of the implications for the NCOSS.

A green waste facility on Block 1653 is likely to be part of a larger action

The *Belconnen District Policy* states there is a need for a green waste facility in the district.³⁴ DPA-14 proposes that a green waste facility be allowed on Block 1653 *in a planning sense only*. That is:

- If DPA-14 is approved, a green waste facility will be a form of development assessable and allowable (i.e., approvable) under laws applicable in the ACT.
- Subsequent approvals would be required relating to matters including (but not limited to) controlling pollution to maintain water quality and protecting environmental and cultural heritage.
- To inform the public at this early stage, the TPA has provided ecological, cultural heritage and other assessments of Block 1582.³⁵
- The TPA has also provided a feasibility study, prepared by Cardno in 2022, that includes a detailed analysis of sites "from a functional perspective [having] sought to identify opportunities and constraints for development of a Resource Management Facility" in north Canberra.³⁶

While Block 1653 is modest in size at 5.08 ha, DPA-14 would make a temporary use permanent. By virtue of a road necessary to access that 5.08 ha site, it will also 'open up' access to the middle of Central Molonglo. That is, if approved, access to the green waste facility will enable co-location and diversification of the rest of the Broadacre Area and beyond into a resource management facility capable of serving the whole of Canberra's north side once the Mitchell facility closes.

Comparable green waste facilities in the ACT are far larger. The Parkwood Road facility is estimated at 7 ha and Mugga Lane at 9 ha.

What the area would be, in hectares, were an entire resource management facility co-located and operated at this Central Molonglo location is another matter entirely.

This initial action should not proceed if the larger proposed action is unacceptable

Block 1653 was formerly part of Block 1582. This fact is mentioned on p. 9 of DPA-14's *Supporting Report*.

The ecological and cultural heritage assessments were prepared for the larger parent Block 1582, not for Block 1653. They record that vegetation removal and deep ripping for

³⁴ ACT Government n 6 (Belconnen District Strategy), p. 57

³⁵ Footnotes 10-11, 47

³⁶ Cardno n 8 (*Design Options Study*), pp. iv, 22, underline added

irrigation severely disturbed parts of Block 1582.³⁷ We accept, working off satellite imagery, that Block 1653 is severely degraded and contains no remnant vegetation. The ecological report also records, however, that the wider Block 1582 site retains mature remnant Blakely's Red Gum, *Eucalyptus blakelyi*, and Apple Box trees, *E. bridgesiana*.³⁸ The heritage assessment of Block 1582 records two Aboriginal artefact sites.³⁹ DPA-14 tells us little of what lies beyond.

Explanations of the surrounding areas environmental values are cursory

The *Supporting Report* mentions the surrounding area's environmental values, however, the explanation is cursory and makes presumptions:

*The District Strategy identifies the area surrounding the site as ecologically significant to be retained to protect environmental and heritage values, as well as broader landscape character. Operation of the facility will be appropriately managed in-line with the Environment Protection Act to ensure surrounding ecological values are protected.*⁴⁰

That reads as though the outcome of subsequent processes necessary to determine if a green waste facility will be acceptable and could be approved have already been determined.

To be sure, The *Belconnen District Strategy* makes clear Block 1653 is almost completely surrounded – to an extent of around 300 degrees – by 'sensitive ecological communities'⁴¹ (Figure 8). The 'potential threatened woodland'⁴² around Block 1653 is likely to be Box-Gum Woodland.

Inadequate assessment

The *Supporting Report* indicates the Belconnen District and Non-Urban Zones policies are relevant. The *Supporting Report* states:

*Recycling facility and bulk landscape supplies are not permitted uses in the non-urban zones (NUZ1-5). However ... , the district policies override the zones policies to the extent of the inconsistency.*⁴³

That is the extent of the explanation provided before the conclusion:

*The relative impacts of the proposed changes were assessed, and the proposal is considered to be consistent with the Planning Strategy and Belconnen District Strategy.*⁴⁴

All other statements explain the role and function of different aspects of the legal, regulatory, planning and administrative environments.

In our view, this assessment is manifestly inadequate. For example, the assessment in DPA-14 does not engage with the following facts. Figure 8 in the *Belconnen District Strategy* (Figure 8) indicates:

- blocks 1653 and 1582 are part of the blue-green 'Urban ACT ecological network'

³⁷ Past Traces n 11 (Aboriginal Cultural Heritage Assessment), p. 5

³⁸ Capital Ecology n 10 (Ecological Advice), p. 1

³⁹ Past Traces n 11 (Aboriginal Cultural Heritage Assessment), p. 16

⁴⁰ TPA n 5 (*Supporting Report*), p. 11

⁴¹ ACT Government n 6 (*Belconnen District Strategy*), Figure 8 on p. 15

⁴² ACTmap n 7

⁴³ TPA n 5 (*Supporting Report*), p. 12

⁴⁴ TPA n 5 (*Supporting Report*), p. 15

- no development is planned in Central Molonglo before 2038, i.e., viewing Figure 8 on page 15 of the *Belconnen District Strategy*, which we understand is based on investigations planned as outlined in the strategy, change is not predicted to happen anywhere in Central Molonglo within 15 years of approval of the strategy in 2023⁴⁵

Nowhere is the importance of Central Molonglo's woodland as a source of connectivity acknowledged ([Figure 9](#)).

In view of the above, the *Supporting Report* is factually incorrect in stating the proposed changes are consistent with the *Belconnen District Strategy*. While we understand district strategies are not regulatory documents, we expect the ACT Government will transparently inform the public, in the district strategies, of future plan amendments under consideration. The proposal set out in DPA-14 is not indicated in the *Belconnen District Strategy* which states:

*The outcomes of the work undertaken through the district strategy initiatives will inform future Territory Plan amendments. These are statutory processes that involve supporting reports and necessary assessments to make available land that is 'planning ready' in a clear and coordinated way.*⁴⁶

The urgency embodied in the Suburban Land Agency's (SLA) letter to the NCA dated 22 January 2026⁴⁷ is the *antithesis* of effective, coordinated landscape planning, an admission of failure. In this case, the 'necessary assessment' is inadequate.

NCA decision (without consultation)

The *Supporting Report* notes "recycling facility and/or bulk landscape supply establishment are not generally permitted in the Broadacre Area"⁴⁸; yet, without consultation, the NCA Board has "agreed to the use of Block 1582 Belconnen for the purpose of a green waste facility and bulk landscape supplies."⁴⁹ The NCA Board 'satisfied itself' that the use of Block 1582 as a green waste recycling facility "is not inconsistent with relevant principles and policies of the" *National Capital Plan*.⁵⁰ However, the NCA did not explain how it concluded that this use is not inconsistent with the broad framework for land use in the Territory, as shown in Figure 2 'General Policy Plan' ([Figure 1](#)), which to the Council indicates the area is not to be developed for urban use.

We note the evidence presented to the NCA by the SLA⁵¹ states:

- "Block 1582 has been identified as the only viable site within Belconnen in the short term."
- the Cardno Design Options Study⁵² provides "comprehensive justification for the selection of Block 1582 as the preferred site for a green waste facility."

⁴⁵ ACT Government n 6 (*Belconnen District Strategy*), both Figure 8 on p. 15

⁴⁶ ACT Government n 21 (*Belconnen District Policy*), p. 16

⁴⁷ Suburban Land Authority (SLA) (22 January 2026) *Letter to NCA from SLA*, attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0009/3079935/8f3e385492b0dd906e8674d7e6eb13e5d76732b1.pdf

⁴⁸ TPA n 5 (*Supporting Report*), p. 9

⁴⁹ NCA n 12 (*Response letter to the SLA*)

⁵⁰ *Ibid.*

⁵¹ SLA n 47 (*Letter to NCA from SLA*)

⁵² Cardno n 8 (*Design Options Study*)

We query how the NCA understood these propositions. Did the NCA understand Block 1653 is steep and will require significant earthworks⁵³ (Figure 10)? If as we suspect the facility will only be adequate for the short term, is that good planning? What did the neighbouring lease managers think about these propositions? It appears they are not happy.⁵⁴

Commonwealth environmental significance has not been assessed

The ecological advice relied on for DPA-14 contains no assessment against the EPBC Act, despite several potential matters of national environmental significance in the immediate vicinity:

- As noted above, the ecological advice records that mature remnant Blakely's Red Gum trees exist on Block 1582. This is a defining species in Box-Gum Woodland; occurrences of as small as 0.1 hectare are protected. The occurrence mapped on Block 1582 is contiguous with other mapped "Potential Threatened Woodland".⁵⁵
- The ecological advice acknowledges Block 1582 provides foraging habitat for the Superb Parrot, *Polytelis swainsonii* (listed Vulnerable under the EPBC Act), "and other significant woodland birds".⁵⁶
- The wider West Belconnen area has recorded the Golden Sun Moth, *Synemon plana* (Critically Endangered) and the Pink-tailed Worm-lizard, *Aprasia parapulchella* (Vulnerable), neither of which a single brief spring inspection could reliably have detected.
- Block 1653 lies in the vicinity of the Ginninderry Conservation Corridor, visible as Woodstock Nature Reserve in Figure 4, established as the legally binding biodiversity offset for Commonwealth-approved development in Ginninderry. A permanent source of leachate, dust, weed propagules and fire risk beside that corridor would tend to undermine a Commonwealth-sanctioned offset.

We submit that, before any amendment proceeds, the ACT Government make clear its broader intentions and conduct current and targeted surveys of that wider area. These surveys — conducted in the correct survey seasons — should be completed. Once completed, the ACT Government should consider its obligations to refer its entire Central Molonglo development vision to the Commonwealth Minister for the Environment for a decision on whether an assessment and approval is required under the EPBC Act.

⁵³ Cardno n 8 (Design Options Study), p. 25

⁵⁴ Bushnell, I. (18 June 2026) Woolgrower upset at bid to make West Belconnen green waste site permanent and much bigger, In *Region*, <https://region.com.au/woolgrower-upset-at-bid-to-make-west-belconnen-green-waste-site-permanent-and-much-bigger/975152/>; Lindell, J. (12 July 2026) Why this proposed planning change is sparking fierce farmer pushback, In *The Canberra Times*, www.canberratimes.com.au/story/9309064/landholders-worry-over-plan-to-build-green-waste-facility/; Canberra Public Interest (online) *DPA-14: Draft Planning Amendment 14*, <https://canberrapublicinterest.au/issues/dpa14/>, viewed 13 July 2026

⁵⁵ ACTmap n 7

⁵⁶ Capital Ecology n 10 (Ecological Advice), p. 2

A refused use – later approved on a temporary basis – is to be allowed, permanently

In 2023, the TPA granted the ACT Government a temporary-use approval for the permanent development it had earlier refused (DA202240118).⁵⁷

The key reasons for the TPA's initial refusal are outlined above; reiterating, among the reasons published, the TPA noted that the works constituted a recycling facility rather than a temporary use, that the proposal did not comply with the requirements for merit-track applications, and that "the authority is not satisfied that the subject land is suitable for the proposed development".⁵⁸ Transport Canberra and City Services and the Emergency Services Agency were unable to support it on traffic and bushfire grounds. It proceeded only on reconsideration, as a strictly time-limited trial.

DPA-14 now seeks to make this same use permanent. The neighbours and referral agencies accepted a capped three-year trial; permanence removes the safeguard on which that acceptance rested. The bushfire, emergency-services, traffic and remediation concerns that underpinned the refusal are unchanged; hence, in our view, the land remains unsuitable, and the appropriate response is to identify a better-located site.

Traffic, odour and water

The traffic assessment attached to DPA-14 is dated April 2022 and was prepared for the small temporary operation, modelling only Belconnen and Molonglo demand and drawing no distinction between temporary and permanent use. It cannot support a conclusion of "no adverse impact" for a permanent, whole-of-north-side facility, particularly as the adjoining West Belconnen residential precinct is built and heavy-vehicle movements increase along Stockdill Drive.

The ACT's own separation guideline keeps residential development at least one kilometre from a composting facility because of odour. The neighbouring farm buildings lie about 650 metres away — inside that zone — and a watercourse runs about 30 metres from the site before flowing to the Molonglo River Reserve and the Molonglo River. Block 1653 is also steep and would require significant earthworks, increasing the risk of erosion and sediment reaching that watercourse. A permanent facility generating leachate, dust and weed propagules in this location engages the general environmental duty under the *Environment Protection Act 1997* (ACT)⁵⁹ and the water-quality objectives of the Murray–Darling Basin. This use is, in our submission, fundamentally unsuited to the site.

⁵⁷ TPA (online) *Browse DAs*, record for DA202240118, www.planning.act.gov.au/applications-and-assessments/development-applications/browse-das/development-application-details?da-number=202240118&amendment-version=, viewed 17 July 2026

⁵⁸ *Notice of Decision to Refuse DA202240118* n 16; see also *Notice of Decision on Reconsideration of DA202240118* n 16, p. 4

⁵⁹ *Environment Protection Act 1997* (ACT), www.legislation.act.gov.au/View/a/1997-92/current/html/1997-92.html

First Nations peoples' cultural heritage

The heritage assessment (of Block 1582) records two Aboriginal artefact sites within the study area.⁶⁰ While the consultant rated them of low scientific significance, the Representative Aboriginal Organisations are recorded as considering that all sites should be respected, by avoidance or by mitigation, and that the return of artefacts to country is of the utmost importance.

The assessment's desktop finding that there is "no potential archaeological deposit"⁶¹ rests on what was conceded, i.e., low ground-surface visibility, and on a predictive model in which sites concentrate along drainage lines. We submit that sub-surface testing of Block 1653 is required before any disturbance, and that the four Representative Aboriginal Organisations should be consulted directly.

The *Belconnen District Strategy* does not require a new landfill facility

The TPA's *Supporting Report* states the:

Belconnen District Strategy identifies key short-term infrastructure upgrades required to support the needs of a growing city, including a green waste transfer facility and landfill habitation works in West Belconnen.⁶²

In our view, this could mislead. Reference to the need for 'infrastructure upgrades' in 'a growing city' alongside a confusing selection of words, i.e., 'landfill habitation works', may be taken by members of the public to suggest the *Belconnen District Strategy* calls for a new landfill facility. It does no such thing. We understand the *Belconnen District Strategy* is explaining that the Parkwood Road landfill facility must be rehabilitated.⁶³ Stating that an infrastructure upgrade is required in west Belconnen in the *Belconnen District Strategy* does not support its construction on land shown to be an ecologically sensitive part of the blue-green network.⁶⁴

Matters of process

As noted above, Block 1653 was formerly *part* Block 1582. This fact is mentioned on p. 9 of the *Supporting Report*. Noting DPA-14 is solely about land uses allowed on Block 1653, DPA-14 fails to explain up front in clear and simple terms why all attachments other than the Supporting Report refer only to Block 1582. To the audience we represent, this is confusing.

The Supporting Report explains DPA-14 proposes to amend the *Belconnen District Policy* to formalise and expand the blocks where the specified uses will be permitted.

- We had to read the SLA's letter to obtain a clear view of what is proposed, i.e., the "ACT Government is seeking ... to allow a *permanent* green waste facility and provision of landscaping supplies ...".⁶⁵

⁶⁰ Past Traces n 11 (*Aboriginal Cultural Heritage Assessment*), p. 16

⁶¹ Past Traces n 11 (*Aboriginal Cultural Heritage Assessment*), p. 17

⁶² TPA n 5 (*Supporting Report*), p. 11

⁶³ ACT Government n 6 (*Belconnen District Strategy*), p. 57

⁶⁴ ACT Government n 6 (*Belconnen District Strategy*), Fig 8 on p. 15

⁶⁵ SLA n 47 (*Letter to NCA from SLA*)

Direction 1.2 of the *ACT Planning Strategy* (2018) is to “investigate the potential for new residential areas to the west of the city to meet future housing need”⁶⁶, and Block 1653 lies within the Western Edge Investigation Area.⁶⁷ We know in 2008 a former Planning Minister ruled out ‘urban area’ development *in perpetuity* in Central Molonglo.⁶⁸

- It appears premature to be considering urban development, or development that should be in an urban area, in advance of finalising the Western Edge investigation.
- DPA-14 and its Supporting Report are presented as a proposal in a vacuum. Notably absent is any discussion of the context at Block 1653’s immediate, district and regional context.

Reference is made in DPA-14 to a temporary approval granted in August 2023 (DA202240118); however, records of DA202240118 available on the Browse DAs website⁶⁹ are poor:

- After a copy of the temporary-use approval decision granted in August 2023 was requested, it was provided by the TPA to a Council volunteer; however, as at 10 July 2026, the conditional approval of DA202240118 has not been published.
- There is no link provided to the written representations received during the public notification period.
- The original application in DA202240118 has been removed.

⁶⁶ ACT Government n 19 (*ACT Planning Strategy*), p. 44

⁶⁷ ACT Government n 19 (*ACT Planning Strategy*), Map 6 on p. 40

⁶⁸ *Planning and Development (Plan Variation No 281) Direction* n 31, point 3 in Annexe A

⁶⁹ TPA n 57

Attachment A: Maps and Figures

1. *National Capital Plan*'s map titled 'General Policy Plan & NCOSS – Metropolitan Canberra'
2. Location of blocks 1582 and 1653 in southwest Belconnen⁷⁰
3. Location of Broadacre Area (blocks 1582 and 1653) in 'Central Molonglo'
4. Situation of Block 1653 (yellow oval) in the local landscape – visible are the Western Edge Investigation Area and terrestrial protected areas in the vicinity
5. *Territory Plan* zoning as at Sep 2007⁷¹
6. *Territory Plan* zoning *proposed* in Draft Variation 281⁷²
7. Suburban Land Agency 'Concept Masterplan' for blocks 1582 & 1600 Belconnen
8. Belconnen District Strategy Plan, in the *Belconnen District Strategy*
9. Figure 4 with bird & mammal connectivity mapping added (Block 1653 in pink oval)
10. ACT Government's 'Survey map', focussed on Block 1653, showing topography

⁷⁰ TPA n 5 (Supporting Report) includes a similar map at Figure 2

⁷¹ ACTPLA (30 August 2007) *Draft Variation to the Territory Plan No. 281 Molonglo and North Weston*, <https://web.archive.org/web/20140309191846/http://apps.actpla.act.gov.au/tplan/variatio/dv281/dv281.pdf>, p. 21

⁷² ACTPLA n 71 (*Draft Variation to the Territory Plan No. 281*), p. 37

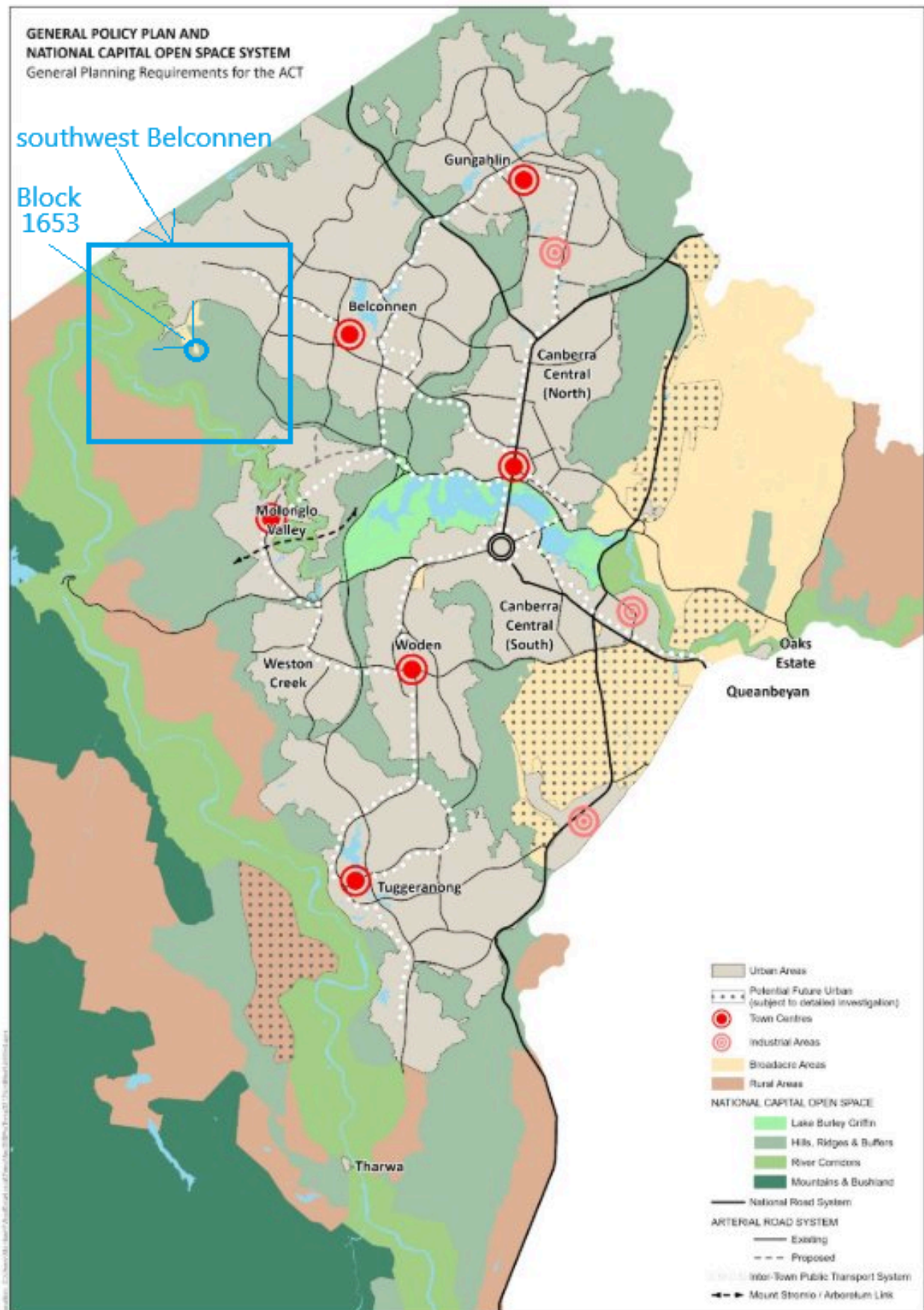


Figure 1: The *National Capital Plan*'s 'General Policy Plan & NCOS – Metropolitan Canberra'⁷³

⁷³ *National Capital Plan*, www.legislation.gov.au/F2007B00014/latest/text, vol 1, Figure 2



Figure 2: Location of Blocks 1582 and 1653 in southwest Belconnen⁷⁴

⁷⁴ 'ACTGOV BLOCK' data has been sourced live here: https://services1.arcgis.com/E5n4f1VY84i0xSjy/arcgis/rest/services/ACTGOV_BLOCKS/FeatureServer



Figure 3: Location of Broadacre Area (Blocks 1582 and 1653) in relation to 'Central Molonglo'⁷⁵

⁷⁵ ACTPLA n 71 (*Draft Variation to the Territory Plan No. 281*), Fig 2.2 on p. 20. A note attached to Fig 2.2's label states "Extract from 'Molonglo Valley Structure Plan' (Source: Annand Alcock Urban Design, May 2006) as amended by ACTPLA to respond to recent studies." This 2006 Structure Plan document cannot be located. The text referring to the figure states the image "is provided for information. Some of the features depicted in the plan, such as the arterial roads, commercial centre locations and the lake, are subject to continued technical investigation and further consideration by Government." Label identifying the location of Blocks 1582 and 1653 have been added.

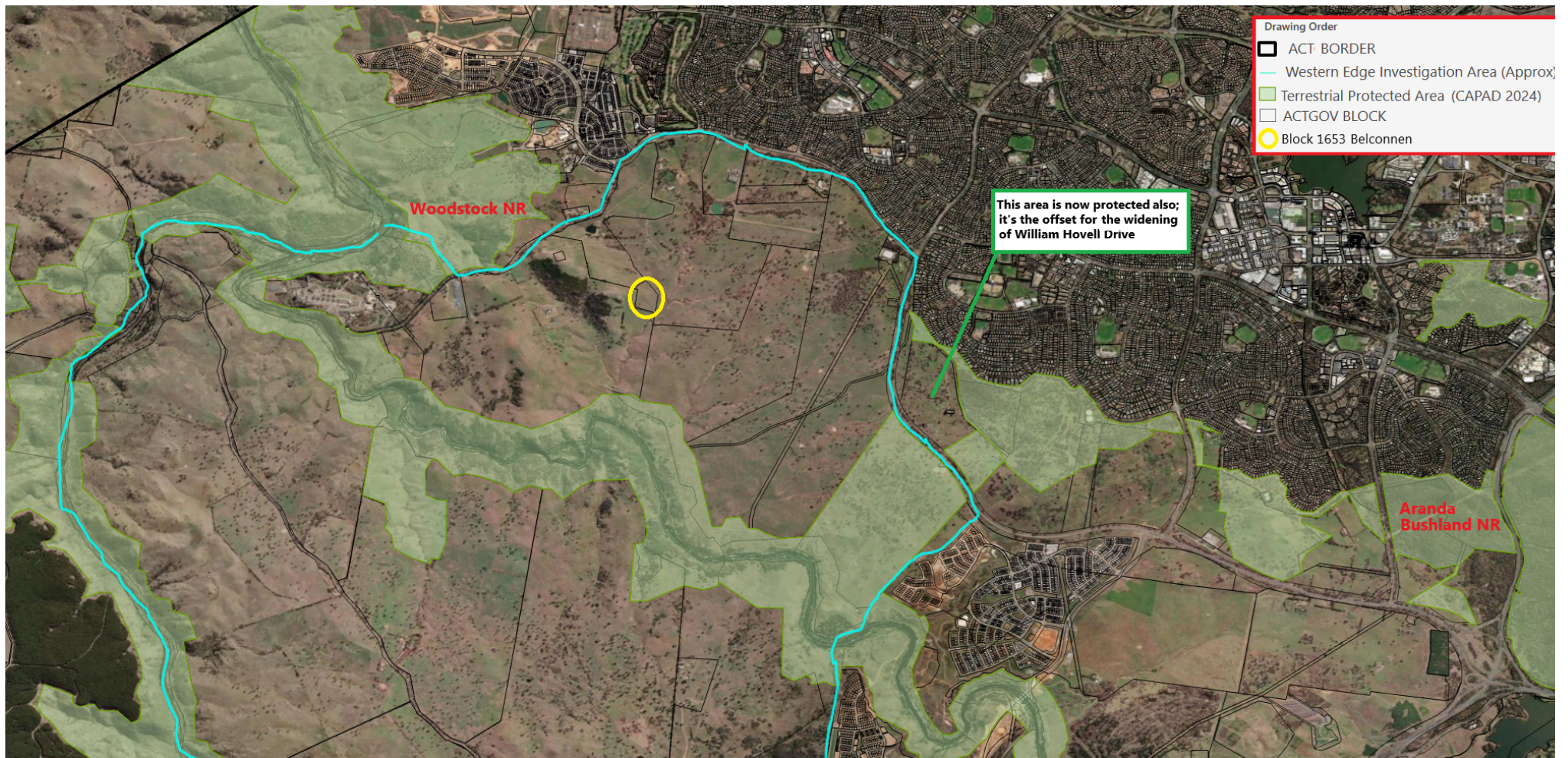


Figure 4: The situation of Block 1653 (yellow oval) in the local landscape⁷⁶

⁷⁶ **Figure 4** shows the *approximate* location of the WEIA with a hand-drawn aqua-coloured line. It shows terrestrial protected areas protect the lower Molonglo River catchment, and the beginning of a connection of woodland habitats between Black Mountain and Aranda Bushland in the east with Woodstock Nature Reserve in the west. Woodland habitats are connected east of William Hovell Drive but not in Central Molonglo. Terrestrial Protected Area data has been sourced live here: https://gis.environment.gov.au/gispubmap/rest/services/ogc_services/CAPAD/FeatureServer. 'ACTGOV BLOCK' data is sourced as per **Figure 2**. The WEIA is hand drawn as no shapefile containing this information has been found on any ACT Government website.

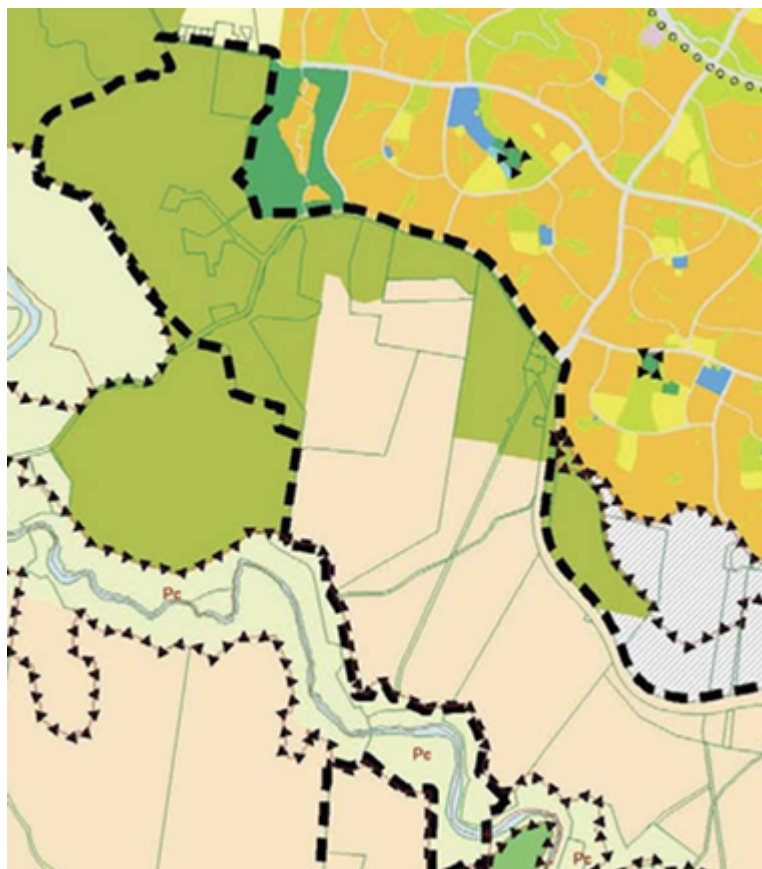


Figure 5: Territory Plan zoning as at Sep 2007⁷⁷

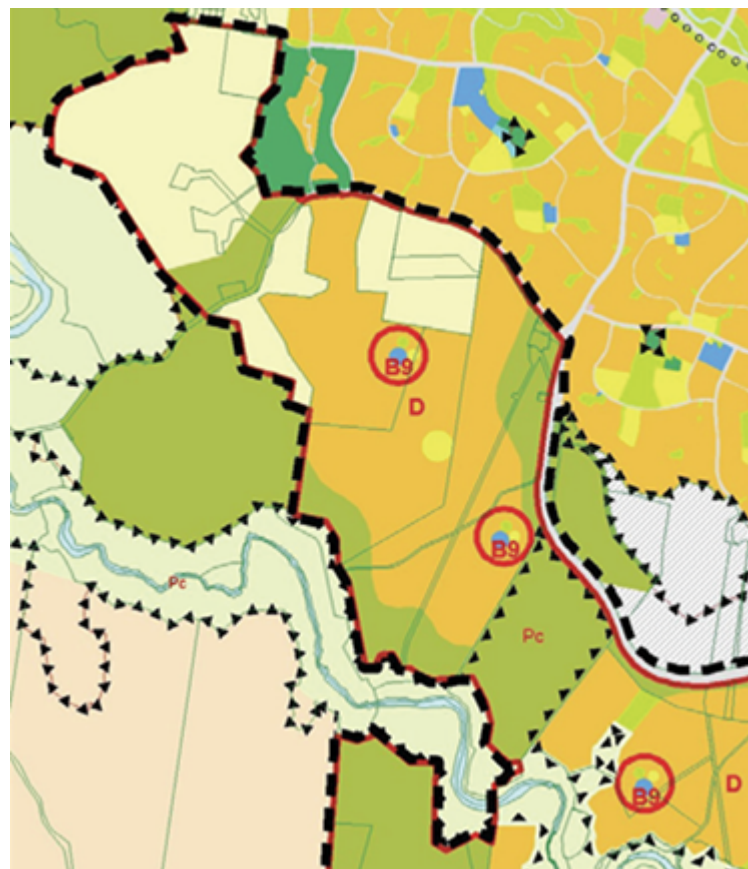


Figure 6: Territory Plan zoning proposed in Draft Variation 281

Territory Plan Map

LAND USE POLICIES

- Designated Areas
See National Capital Plan
- 1. Residential
- 2. Commercial:
 - A - Civic centre
 - B - Town centre
 - C - Group centre
 - D - Local centre
 - E - Corridors and Office sites
- 5. Restricted Access Recreation
- 9. Urban Open Space
- 10. Broadacre
- 11. Rural
- 12. Hills, Ridges and Buffer Areas
- 13. River Corridor
- 16. Major Roads

OVERLAYS

- Area Specific Policies
- Special requirements apply
See National Capital Plan
- Subject to Review
- Defined Land
See also Part 2 of Land Act
- Draft Variation to the Plan having interim effect. See Part 2 of Land Act
- Clearance Zone Policies
- Urban Open Space
Excluded from Public Land
- Type of Public Land Reserve
See also Schedule 1 of Land Act
- Public Land (Arrows point inwards)
See also Part 5 of Land Act
- Special requirements apply flanking
- Main Avenues and Approach Routes
See National Capital Plan
- Intertown Public Transport Route

Area Subject to the Variation

⁷⁷ Figures 5-6 are extracts from, i.e., they are the northwestern portions only, of two images in: ACTPLA n 71 (Draft Variation to the Territory Plan No. 281), pp. 21, 37. Selected portions of the Legends associated with those two maps are included to the right of Figure 6. Note that, until 28 April 2008 with interim effect[#], and from 9 Oct 2008, Block 1582 was zoned 'Hills, Ridges and Buffer Spaces' (Figure 5). The rezoning proposed (Figure 6) included changing: Block 1582 to Broadacre Area, which occurred on 9 Oct 2008; and much of the rest of Central Molonglo to 'Residential', which did not occur; [#]Planning and Development (Draft Variation No 281) Notice 2008 Molonglo and North Weston (NI2008-134), www.legislation.act.gov.au/ni/2008-134/

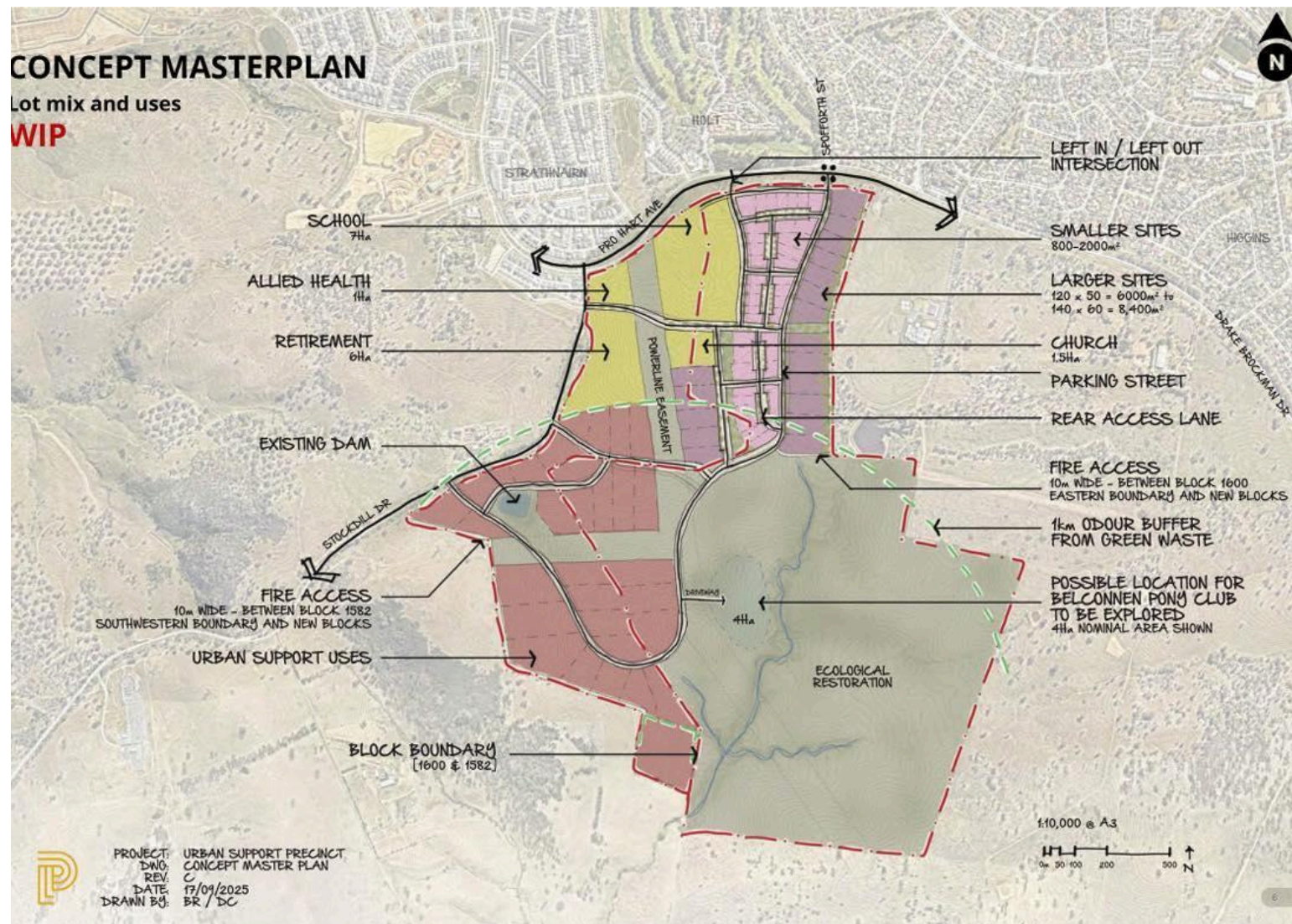


Figure 7: The Suburban Land Agency 'Concept Masterplan' of development proposed on blocks 1582 and 1600 Belconnen (December 2025)⁷⁸

⁷⁸ Belconnen Community Council (3 Mar 26) Post, <https://www.facebook.com/belcouncil/posts/pfbid02tahL1k9ydmaszwmXmUKdkkhJx1aZMnDdmdP7ndioaSgBteZkpl3DStH7ngRkbhYI>, viewed 1 May 26; Bushnell, I. (26 Feb 2026) Survey launched on proposed West Belconnen business and services precinct, In *Region*, <https://region.com.au/survey-launched-on-proposed-west-belconnen-business-and-services-precinct/945036/>; We have confirmed with the SLA that the SLA did indeed release the Concept Masterplan to the Belconnen Community Council.

Figure 8: Belconnen District Strategy Plan

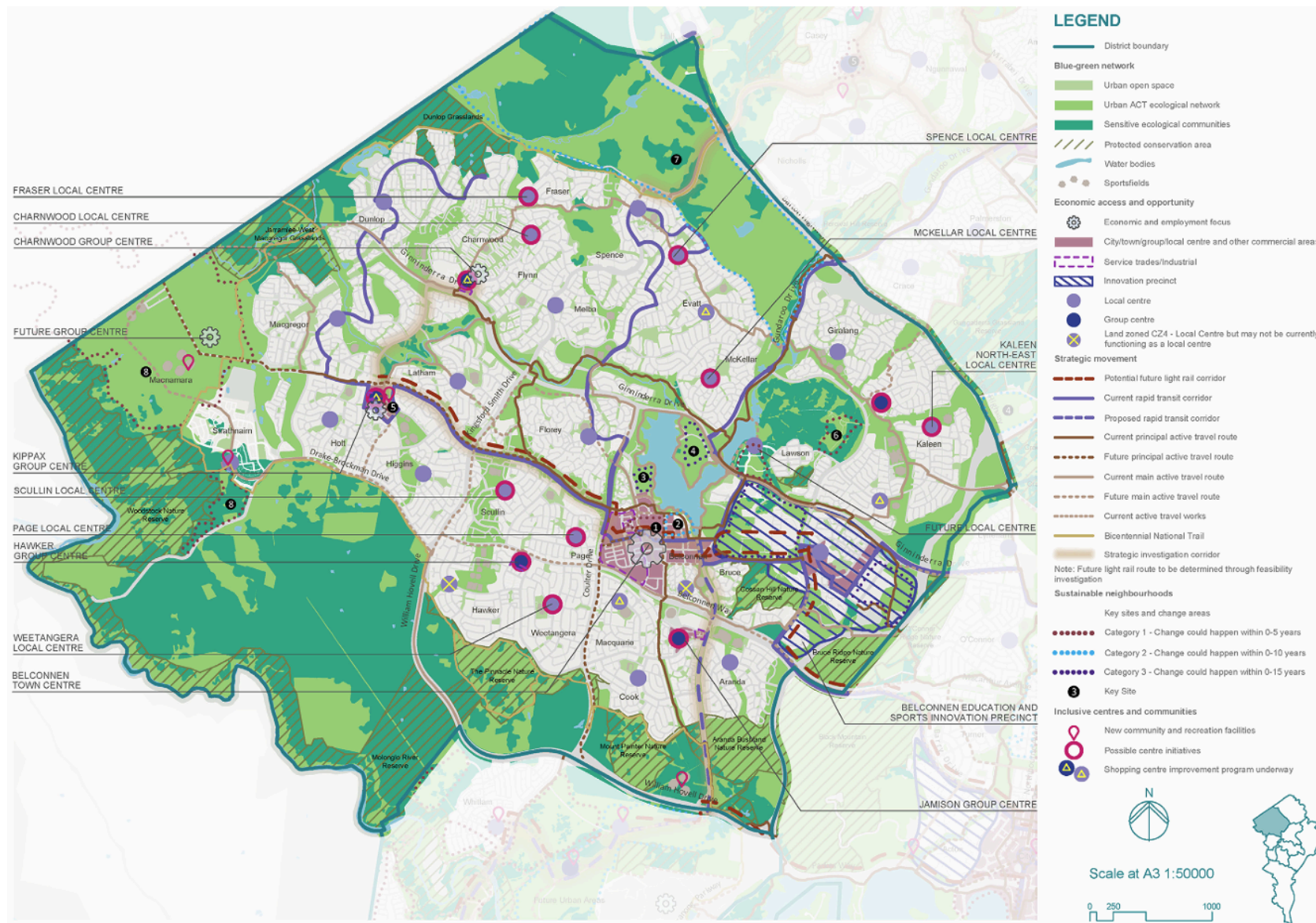


Figure 8: Belconnen District Strategy Plan, in the *Belconnen District Strategy*⁷⁹

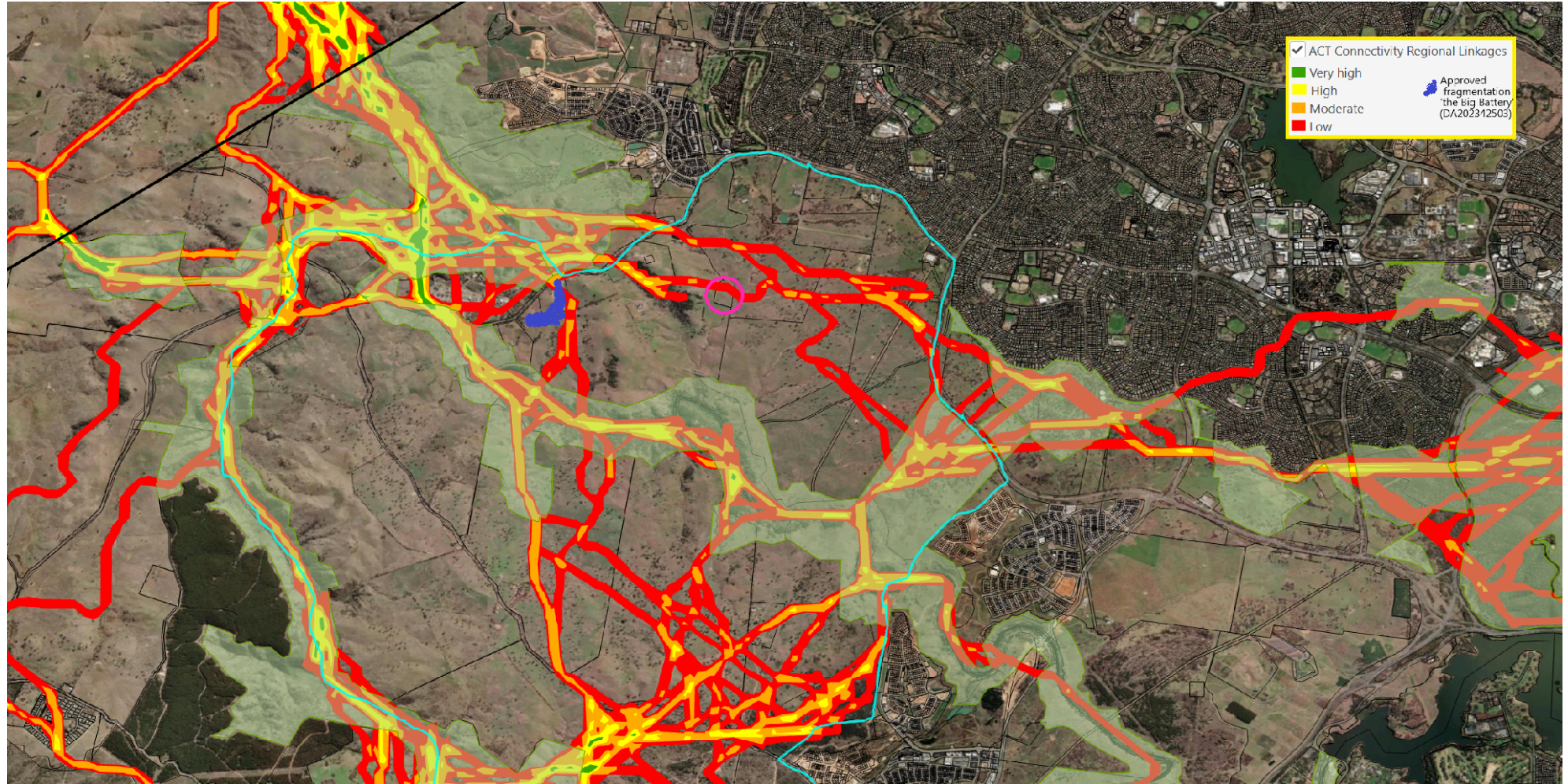


Figure 9: ACT Government mapping shows bird and mammal connectivity in the landscape⁸⁰

⁷⁹ ACT Government n 6 (*Belconnen District Strategy*), Figure 8 on p. 15. Central Molonglo is: identified as including part of the 'Urban ACT ecological network' and 'sensitive ecological areas'; not identified as an area where change will occur within 15 years (of the approval of the strategy in 2023)

⁸⁰ Figure 7 shows the same things as Figure 4 with the ACT Government's bird and mammal connectivity mapping added. In this image, the location of Block 1653 is depicted with a *pink* oval shape. Approved fragmentation yet to occur is depicted in blue, i.e., it is the future site of the 'Big Battery' (DA202342503). Connectivity mapping is sourced as follows: ACT Government (online) *Modelled Regional Connectivity Linkages* for generalist species (birds and mammals), https://services1.arcgis.com/E5n4f1VY84i0xSjy/arcgis/rest/services/ACTGOV_Connectivity_Regional_Linkages_Poly/FeatureServer

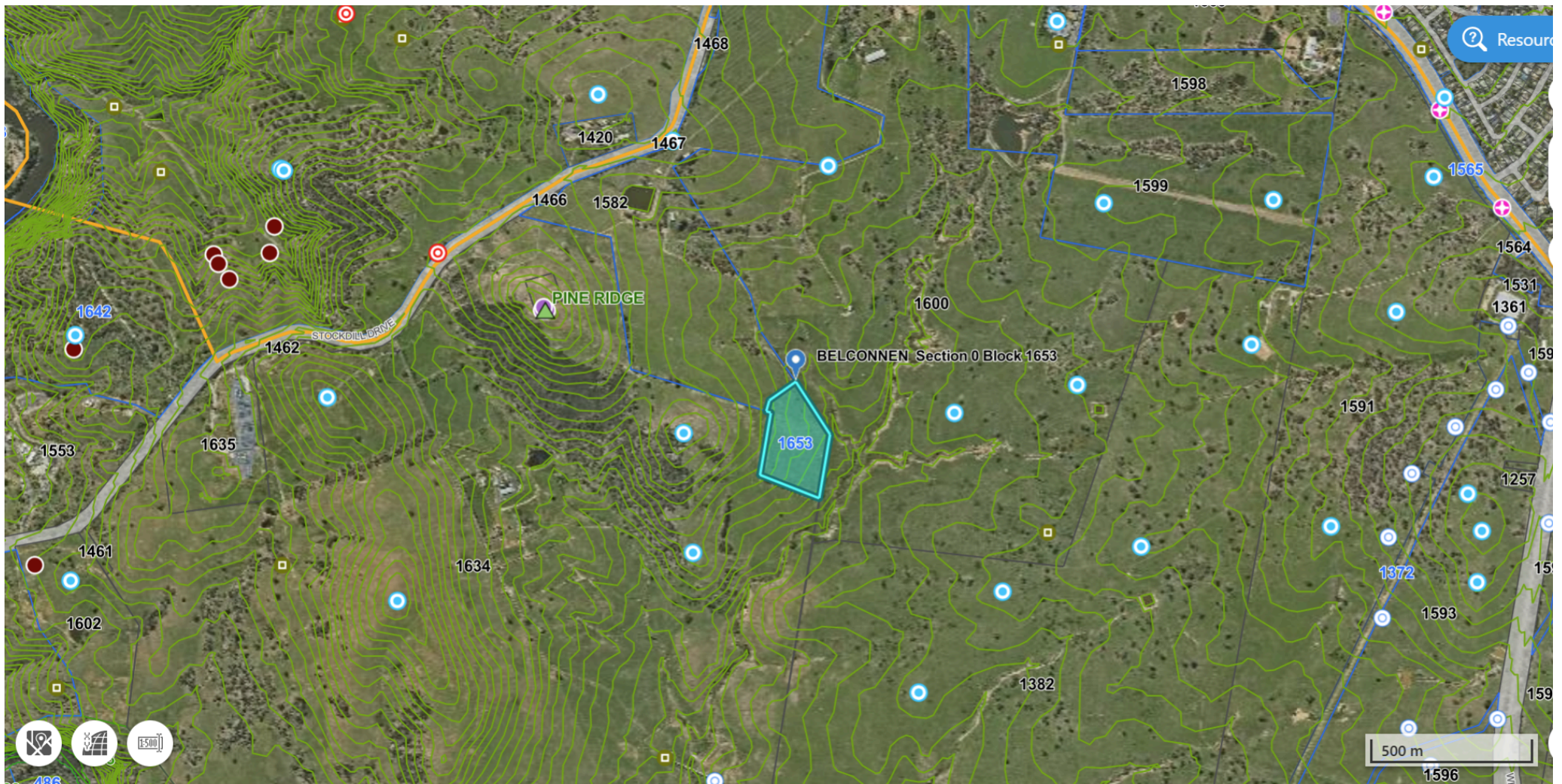


Figure 10: Topography in the landscape (6 metre intervals)⁸¹

⁸¹ Figure 8 is ACT Government mapping of topography in the landscape. Block 1653 (highlighted) has a steep slope; contour lines shown are at six metre intervals. Topographical information is sourced as follows: ACT Government (online) *ACTmapi Survey Map*, <https://apps.vertigisstudio.com/web/?app=6f461ff64e264993912557f79896b9a9>