

Mr Barry Jackson,
Managing Director
Defence Housing Australia
26 Brisbane Avenue
Barton ACT 2600

31st July 2020

Dear Mr Jackson,

Proposed Defence Housing Development in Lawson North

We, the undersigned, representatives of Canberra's key biodiversity groups, scientists, land managers and volunteers with extensive experience in managing Canberra's biodiversity assets, are writing to express our concern about Defence Housing Australia's proposed housing development in Lawson North, ACT.

Our concerns relate to the impact of the development on the critically endangered ecological communities Natural Temperate Grassland (NTG) and Box-Gum Woodland (BGW), and associated threatened and rare species that occur in the area identified as Lawson Grasslands in the *ACT Native Grassland Conservation Strategy and Action Plans*.

The Lawson Grasslands contain over 100 hectares of NTG, a critically endangered ecological community. The grassland at this site is one of only thirteen areas in the ACT that is over 100 ha in area and is the largest area of NTG in Belconnen. Lawson Grasslands, as defined in the NCA's *Development Control Plan 12/09* (DCP 12/09), includes the entire area bounded by Lawson South, Ginninderra Creek/Lake Ginninderra and Baldwin Drive (precincts D and E), with the exception of the former housing site on the eastern side of the hill facing Baldwin Drive (precincts A and B) (Figure 2, DCP 12/09). The site also provides habitat for bird species listed under the Commonwealth EPBC Act (Superb Parrot, Latham's Snipe) and bird species listed under ACT legislation (Scarlet Robin).

We have been informed that there will be two stages to the residential development proposal at this site, Stage 1 and Stage 2. Stage 1 would proceed under the already approved DCP 12/09, which allows for development of precincts A and B.

Stage 2 would require an amendment to DCP 12/09, as currently the DCP specifically excludes development in precincts D and E. It states that Precinct D "has been identified for heritage (natural, historic, cultural and technical) and nature conservation only." Precinct E "has been identified primarily for nature conservation." In both cases "Development of this precinct shall be in accordance with environmental and heritage management plans prepared for the site". It also notes the importance of maintaining the Kangaroo Grass (*Themeda triandra*) grasslands in precinct D.

Precinct D east (Figure 1) is dominated by some of the most extensive Kangaroo Grass community in arguably the best condition remaining in the ACT. Additionally, it contains a population of the vulnerable Striped Legless Lizard (*Delma impar*). While possibly not in such good condition, other parts of precincts D and E proposed for development also contain critically endangered NTG, BGW and habitat for threatened, rare and declining species.

Despite the significant conservation values in this area, identified in both the *ACT Native Grassland Conservation Strategy and Action Plans* and DCP 12/09, the new Master Plan recently released for public consultation proposes destruction of the majority of the critically endangered grassland and woodland in the east of the Lawson Grasslands, to allow development of precinct E, precinct D north and south, and much of precinct D east. While the Masterplan retains part of the grassland in precinct D east as a narrow strip, extensive scientific studies and past experience have demonstrated that the conservation values of a narrow strip of grassland such as this will undoubtedly degrade over time, as it will be heavily impacted by adjacent residential development as well as recreational uses and fragmentation. We note that there are

few open areas identified in the development footprint to mitigate against high impact recreational use of the grassland.

To proceed, the proposal will need to be referred to the Commonwealth to be approved under the EPBC Act, since it impacts on several Matters of National Environmental Significance (MNES). There will also need to be a change to the land use allowed for precincts D and E under the National Capital Plan. We understand that applications to obtain these approvals are imminent.

In the context of Australia's biodiversity crisis and giving consideration to the contribution Lawson North makes to our critically endangered grassy ecological communities, the destruction proposed by this development is unacceptable. The entire extent of the Lawson Grasslands and associated Box-Gum Woodland should be recognised for its ecological, natural and cultural heritage values, and conserved in perpetuity.

We urge Defence Housing Australia to reconsider proceeding with this development so as to ensure ongoing protection, conservation and enhancement of what are nationally important ecological communities under Commonwealth law.

Signed on behalf of:

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Geoff **Butler** (Founding member - Australian Network for Plant Conservation, 2001 ACT Individual Landcare Award recipient, Conservation Advocate - Australian Native Plants Society Canberra Region)
Dr John **Busby** (Ecologist, Mount Painter Parkcare Group)
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Alison **Elvin**, Director, NaturalCapital Pty Ltd
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Dr John **Fitz Gerald** (Friends of Grasslands)
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Copied to:

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Hon Sussan Ley MP, Minister for the Environment
Hon Darren Chester MP, Minister for Defence Personnel
Mr Mick Gentleman MLA, ACT Minister for the Environment and Heritage
Ms Sally Barnes, Chief Executive, National Capital Authority
Dr Sophie Lewis, ACT Commissioner for Sustainability and the Environment
Professor Arthur Georges, Chair ACT Scientific Committee