



**CONSERVATION  
COUNCIL** ACT REGION



Friends of  
Grasslands



# Briefing Paper: Lawson Grasslands

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November 2021

## Summary

Lawson, in the Belconnen region of the ACT, is divided into two areas, the already developed suburbs in the south and an undeveloped area to its north. The undeveloped area, known as 'Lawson North' or 'Lawson Grasslands' is National Land managed by Defence Housing Australia (DHA). DHA has proposed an urban development on part of Lawson North of approximately 416 dwellings. 150 medium-density dwellings are intended to remain in the possession of DHA to provide housing for Defence personnel. The rest will be sold, with profits returning to DHA to support the development.

Prior to European settlement, Canberra was tended by the Ngunnawal and Ngambri Peoples. The Conservation Council ACT Region recognises the ongoing relationship between the Ngunnawal and Ngambri Peoples and the ACT Region, including Lawson Grasslands.

The Conservation Council ACT Region, Friends of Grasslands (FoG), and Ginninderra Catchment Group, do not support the development proceeding due to the development impacts on ecological communities that have national significance - that is the Natural Temperate Grasslands. It would appear to be impossible for the scale of urban development to proceed in accordance with the maintenance of these values. It is proposed that the area of Lawson North should be managed in perpetuity for conservation values.

In 2013, the National Capital Authority (NCA) released a development control plan (DCP 12/09) that defined areas of the site considered suitable for development and those that should be retained for the conservation of critically endangered ecological communities. However, for

DHA's proposed development to proceed, a revised DCP would have to be sought as the current DCP would prevent the urban footprint extending into areas previously identified for conservation.

DHA's development at Lawson will likely trigger national environmental protection laws, and approval will have to be acquired under the Environment Protection and Biodiversity Act (EPBC Act) from the Federal Environment Minister.

The ACT Government has no decision-making power with regards to the development due to the site being gazetted as National Land (though the ACT Government will be consulted for their view). The ACT Government would become further involved in the management of the land once it has been degazetted, with or without development.

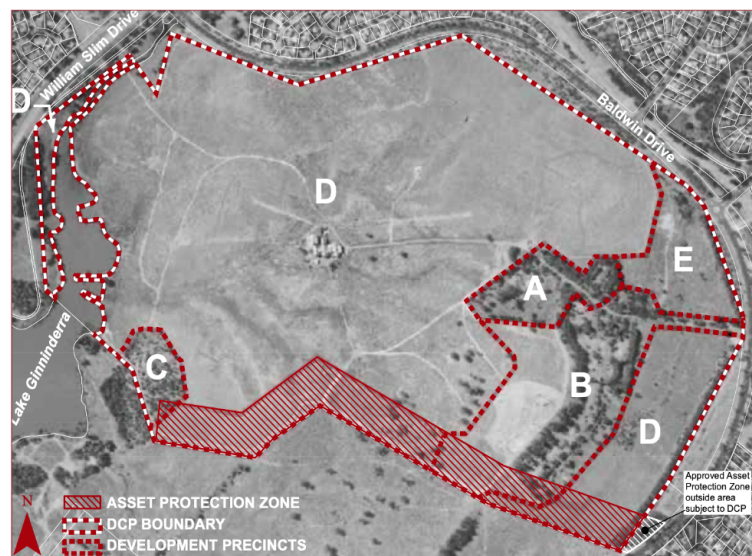


Figure 1: Map of Lawson Grasslands per DCP 12/09

## About Lawson Grasslands

### 1. Environmental Significance and Conservation Advice

#### a. Critically Endangered Ecological Communities

Much of the area proposed for development has been clearly identified by both the Commonwealth Government and the ACT Government as areas that should be retained for their conservation values.<sup>1</sup> The site 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

<sup>1</sup> National Capital Authority, DCP 12/09.

these ecological communities is listed as critically endangered under the EPBC Act, and under the ACT's Nature Conservation Act, 2014.<sup>2</sup>

### **Natural Temperate Grassland (NTG):**

The pre-settlement range of NTG in the South Eastern Highlands is estimated to be in the order of 500,000 ha. NTG is now highly depleted, and it is very poorly represented in the formal reserve network. It is estimated that only about 1% of the pre-settlement extent is now protected in nature reserves and national parks.

NTG comprises a suite of plants and animals, with over 500 native plant species and a much greater number of animal species, most of which are invertebrates, with the majority remaining very poorly known. NTG is characterised by its diversity of attractive wildflowers, including some threatened species such as the Ginninderra Peppercreep. Although less well known, the fauna found in these grasslands is equally distinctive. Some examples are the critically endangered Golden Sun Moth, endangered Grassland Earless Dragon, vulnerable Striped Legless Lizard and vulnerable Perunga Grasshopper. Many of these species are found at Lawson Grasslands.

NTG occurs throughout Precincts D and E (see Figure 1). Precinct D is 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.<sup>3</sup> 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 largest area of NTG in Belconnen. The Grassland Strategy also states that the Lawson grassland is a "Key threatened species habitat" (per page 16).

### **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.

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<sup>2</sup> 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.

<sup>3</sup> 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.

Precinct E includes a partly cleared woodland with some scattered trees and a diverse grassy groundlayer. It falls under the definition of derived native grassland under the EPBC Act-listed BGGW. It also provides habitat for vulnerable woodland birds as described in relation to Precinct D. Additionally it has large patches of Short Wallaby-grass (*Rytidosperma carphoides*) which provide habitat for the critically endangered Golden Sun Moth.

## b. The Significance of the Critically Endangered Ecological Communities

### Matters of National Significance

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.<sup>4</sup> Australia is one of seventeen 'mega-diverse' nations in the world, making our biodiversity internationally significant.<sup>5</sup> However, Australia has the unfortunate distinction of being a world in extinction and Eastern Australia is also globally recognised as a deforestation front.<sup>6</sup> As such, the ecosystems with high conservation values at Lawson are not just locally significant, but nationally.

### Carbon Sink

The ecological communities at Lawson north have an important role to play in carbon sequestration, which further highlights their environmental significance.<sup>7</sup> Temperate grassy ecosystems, such as those at Lawson, are effective carbon sequestration mechanisms. The relatively stable soil environment of temperate grasslands is conducive to accumulation of organic matter, because there is a slow turnover of carbon underground. Consequently, grassland soils contain large stocks of carbon in the form of soil organic matter that has accumulated during the lifetime of the grassland community.<sup>8</sup> As such, any development at Lawson would be harmful to our climate.

### Habitat for Threatened and Rare Species

Because of the restricted access to the site, a definitive, independent ecological assessment is unable to be conducted at this stage. DHA have not shared their full ecological assessment and are unlikely to until the referral under the EPBC is made.

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

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<sup>4</sup> 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.

<sup>5</sup> 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.

<sup>6</sup> Ibid.

<sup>7</sup> Scurlock, J.M.O. and Hall, D.O. (1998) 'The global carbon sink: a grassland perspective', *Global Change Biology*, 4(2), pp. 229–233. doi:[10.1046/j.1365-2486.1998.00151.x](https://doi.org/10.1046/j.1365-2486.1998.00151.x).

<sup>8</sup> Grassland carbon sequestration: management, policy and economics Proceedings of the Workshop on the role of grassland carbon sequestration in the mitigation of climate change Rome, April 2009 (p2).

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, White-bellied Sea-Eagle, Dusky Woodswallow, Flame Robin, Swift Parrot, Diamond Firetail, and Spotted Harrier.

## 2. Additional Environmental Concerns

### a. Direct Effects, Increased Fragmentation and Increased Edge Effects

Part of the proposed development footprint will significantly encroach on the NTG in Precinct D to the east.

The proposed development will likely lead to increased fragmentation and increased edge effects. In terms of protecting the significant natural values of the proposed development area it is considered poor conservation reserve planning to propose an area of urban development that will be inserted as a long wedge into a nationally significant area of grassland and woodland.

The Conservation Advice for NTG advises that the areas considered critical to the survival of the ecological community cover all patches that meet the key diagnostic characteristics and condition thresholds for the ecological community plus buffer zones.

The Conservation Advice for NTG states that some factors should be considered when assessing the impacts of actions or proposed actions under the EPBC Act for a particular patch, including the patch's large size and patches with large area to boundary ratio. Larger area to boundary ratios are less exposed and more resilient to edge effect disturbances such as weed invasion and human impacts. The Conservation Advice 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. The outer edge of the former Belconnen Naval Transmission Station is currently about 4.9 km. 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.

### b. Urbanisation

Development of infrastructure on areas of NTG and BGGW will significantly reduce the areas of both critically endangered ecological communities in the short term. The long-term impacts (see above) of a residential development set within a conservation area of such high value will be significant over time. Management of public access, predatory and herbivorous pest animals, kangaroo population management, edge effects of run-on and weed invasions will be major challenges.

### 3. Heritage Values

#### a. Naval Heritage

Lawson north was formerly used as a Naval Transmission Station. The Belconnen Naval Transmission Station (BNTS) is a Commonwealth Heritage listed Property. As such, Lawson is significant to Australia's naval heritage. The current DCP (12/09) protects the Belconnen Naval Transmission Station buildings, and some of the surrounding land. This area is recognised in Precinct D.

#### b. First Nations Heritage

In addition to Lawson North having Naval heritage value, it is anticipated that the site also has great cultural value for First Nations Peoples. Assessment of indigeneous heritage values has been commenced by DHA as part of their preparations for development.

# Relevant Legal and Regulatory Procedures

## 1. Upcoming Consultation

### a. EPBC Referral (Matter of National Environmental Significance)

As the development is likely to impact several nationally significant threatened species and ecological communities, it will be referred to the Department of Agriculture Water and the Environment for determination of its status as a controlled action under the EPBC Act. DHA has indicated they will be in a position to lodge the EPBC referral in January 2022, including the results of the environmental assessment.

This determination will be open for public consultation for 10 business days. It is likely that the development will be considered a controlled action. Following this, required assessment documentation will be provided to the Environment Minister, at which time another round of public consultation will occur and mitigation and remediation strategies will be considered if relevant.

Further Resources:

- [EPBC Act Referrals: Opportunities for comment & legal action](#)
- [Writing a Good Submission on a Referral under the EPBC Act](#)
- [EPBC Referral Submission Template](#)

### b. National Capital Act Planning Approval

In addition to approval under the EPBC Act, for a new development to be approved that alters the current DCP (12/09) another application will have to be made to the NCA.

## 2. Other

### a. ACT Government

As discussed above, because the land is National Land, the ACT Government has a limited ability to influence the development. However, The ACT Government, under EPBC processes, is invited to provide comment to the Commonwealth Department of Agriculture, Water and the Environment via the Environment Planning and Sustainable Development Directorate .



## 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 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.

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