



**CONSERVATION
COUNCIL** ACT REGION

Submission to Environment Planning and Sustainable Development Directorate (Planning): DA-202342438

February 2024

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.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide feedback on Development Application 202342438 for the proposed development at the Ainslie Volcanics site. The Council objects to the DA 202342438. This site is noteworthy as it is considered part of a site of significant heritage and ecological value known as the Ainslie Volcanics. Furthermore, the Council does not support any development in ecologically sensitive areas without the provision of an Environmental Impact Statement (EIS).

The area has been nominated for the ACT Heritage Register for Aboriginal heritage values associated with the outcrops, and the place name 'Nadya Ngambri' reserve has been nominated.

Biodiversity Context

The ACT, like the rest of Australia, is battling an extinction crisis. Canberra's mature trees are being removed at alarming rates¹; our faunal emblem, the Gang-gang Cockatoo is endangered; and our natural areas are at increasing risk of development and degradation.² Canberra's unique animals and plants are under significant pressure. In July 2022, a landmark State of the Environment Report was released outlining that overall Australia's natural environment is "poor and deteriorating."³ The report found more extinctions are expected in the next decades. The ACT is experiencing this biodiversity crisis with five new species added to the ACT Threatened Native Species List since 2020⁴. The ACT is home to two critically-endangered ecological communities, both of which are located at the Ainslie Volcanics site.⁵ The protection of remaining Natural Temperate Grasslands and Box Gum Woodlands is especially important given their national significance, as well as their intrinsic value and the amenity they bring to our city. In view of the pressure on biodiversity across the ACT, the Ainslie Volcanics should now be appropriately protected and managed for effective conservation outcomes. It is essential to protect the ecosystems that are left as increased fragmentation across the Territory will lead to an even greater and eventually complete loss. What we do here in the ACT has far reaching implications nationally for our biodiversity, and ultimately our future.

Ainslie Volcanics

The Ainslie Volcanics site should be incorporated into the reserve system due to its ecological values. The site contains Natural Temperate Grassland, a critically endangered ecological community. These ecological communities are important for the same reasons that all natural areas are important: they provide habitat for threatened and rare species, store carbon,⁶ increase soil, air, and water quality;⁷ support pollination,⁸ control diseases,⁹ and increase the livability of the city.¹⁰

Natural Temperate Grassland is one of the most threatened ecosystems in Australia, with only 0.5% remaining in good condition¹¹. Urban development and cumulative impacts are a threat to

¹ Environment Planning and Sustainable Development Directorate, 2023. Loss of Mature Native Trees Key Threatening Process Action Plan. Accessed via: https://www.environment.act.gov.au/__data/assets/pdf_file/0011/2316188/Loss-of-Mature-Native-Trees.pdf

² Conservation Council ACT Region and Friends of Grasslands, 2022. *Building a Biodiversity Network Across the ACT*. Available at: https://conservationcouncil.org.au/wp-content/uploads/BRIEFING_BIODIVERSITY-NETWORK-_Final_Version_December.pdf

³ Australian Government, 2021. *Australia State of the Environment Report 2021*.

⁴ Office of Sustainability and the Environment. *State of Environment Report 2023*. - when published check reference

⁵ Environment Planning and Sustainable Development Directorate, 2024. Threatened Species and Ecological Communities.

Accessed via:

<https://www.environment.act.gov.au/nature-conservation/conservation-and-ecological-communities/threatened-species-and-ecological-communities>

⁶ D. Lindenmayer and M Vardon, *Ecosystem accounts in box gum grassy woodlands*, 2021.

⁷ P. Smith et al, *The role of ecosystems and their management in regulating climate, and soil, water and air quality*, 2012.

⁸ A. Vanbergen *Threats to an ecosystem service: pressures on pollinators*, 2013.

⁹ K Zimmer, *Deforestation is leading to more infectious diseases in humans*, 2019

¹⁰ Jacobs et al. *Livability: Natural environment*, 2014

¹¹ Environment Planning and Sustainable Development Directorate, *Natural Temperate Grassland*. Accessed via:

<https://www.environment.act.gov.au/nature-conservation/conservation-and-ecological-communities/threatened-species-factsheets/natural-temperate-grassland#:~:text=These%20natural%20temperate%20grassland%20communities,and%20infertile%20or%20clay%20soils.>

Natural Temperate Grassland survival. When the ecosystem is fragmented into smaller pieces by roads and infrastructure it can no longer serve an ecosystem function. Construction and development of the telecommunication tower infrastructure impacts the site through introducing invasive species, light and noise pollution, roads and vehicles. As a result the ecosystem can no longer perform a habitat function for species dependent on the ecosystem. Species that depend on a threatened ecosystem for habitat are themselves at risk of extinction. Threatened grassland species in the ACT include the Striped Legless Lizard, the Golden Sun Moth and the Button Wrinklewort. The endangered Gang-gang cockatoo relies on the Box Gum Woodland for habitat. Urban development at the Ainslie Volcanics will have both direct and indirect impacts on the ecological values across the site. Notably, Ainslie Volcanics will suffer a direct loss of habitat from the proposed development. Ainslie Nature Reserve as a landscape will also suffer indirect effects such as urban edge effects, augmenting exotic plant and animal infestations, noise and light pollution.¹²

Importantly, the Ainslie Volcanics site plays a role in landscape connectivity, a conservation principle that recognises that habitats and species survive and adapt better when they form part of a protected network.¹³ The site links to the Mount Ainslie Nature Reserve. It therefore provides a movement corridor for flora and fauna between remnants which improves the function and diversity of natural habitats. The DA fails to identify the value of the Ainslie Volcanics within the landscape context of Mount Ainslie. Further research must be conducted to determine these values, considering the ecological communities at the site as well as the species dependent on this habitat.

Consultation

A dedicated group of volunteers, the Ainslie Volcanic Weeders, have been caring for the site since 2022. In June 2023 a community petition to the Legislative Assembly received 581 signatures, calling on the site to be protected as part of the Mount Ainslie Reserve. Volunteer work ensures the grasslands are preserved and maintained against threats from invasive species. Protecting these areas aligns with the 2017 *ACT Native Grassland Conservation Strategy* and the *ACT Nature Conservation Act 2014*. The Natural Temperate Grassland site is in a condition that requires restoration, which is already being attempted by the Ainslie Volcanic Weeders community group, who should be supported to continue to restore the grassland.

It is disappointing no environmental groups were consulted during community consultation, and especially that the Conservation Council ACT Region, Australian Conservation Foundation Community Canberra, Friends of the Ainslie Volcanic Grasslands or Friends of Grasslands were not identified as key stakeholders.

Incorporating the Ainslie Volcanics site into the Canberra Nature Park will protect this site of significant heritage and ecological value.

¹² Smith, Peter & Smith, Judy. (2010). *Urban edge effects in the Blue Mountains, New South Wales: implications for design of buffers to protect significant habitats*. Pacific Conservation Biology. 16. 92-100. 10.1071/PC100092.

¹³ Sharp, S and Bulling, P. *Building a Biodiversity Network across the ACT*, 2022.

Recommendations

- Incorporate the Ainslie Volcanics into the reserve system
- Increase Parks and Conservation staff levels and resources to allow for inclusion of the site into the reserve system.
- Consult with environmental stakeholders
- Require an assessment of urban edge effects including mitigation measures.
- Further assessment should be undertaken to investigate:
 - Threatened listed species at the site.
 - Woodland bird populations across the site.
 - The impacts of the development within a landscape context.
 - Construction impacts including from vehicles, introduction of invasive species and litter.
- If the project is approved, incorporate the remaining Ainslie Volcanics site into the reserve system and support the Ainslie Volcanic Weeders to rehabilitate the site.