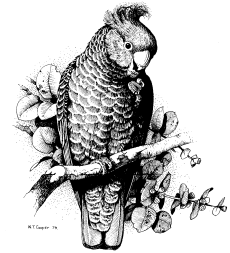


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The Hon Tony Burke MP
Minister for Sustainability, Environment, Water, Population and Communities.
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House of Representatives, Parliament House
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Dear Minister Burke

I am writing on behalf of some 350 members of the Canberra Ornithologists Group Inc (COG) who are concerned about the planned urban development by the ACT Government in the suburb of 'Throsby' in Gungahlin, ACT, and its impact on threatened species and ecological communities, in particular the impact this urban development will have on critical nesting habitat of the nationally threatened Superb Parrot.

We understand that your Department is likely to make decisions in relation to the urban development in the near future, as the proposed development will trigger action under federal law (*EPBC Act 1994*). COG urges you to protect the Superb Parrot's nesting habitat by NOT allowing any urban development in Throsby, that is, all the land east of the existing roadway Horse Park Drive. COG believes this outcome will provide the best opportunity to ensure that this critical area, the most important known breeding site for Superb Parrots in the ACT, will not be impacted by urban development and related influences.

COG is dedicated to the study and conservation of native birds and their habitats. COG is essentially concerned with better protection for native vegetation which provides habitat for various species of birds, especially birds which are associated with grassy woodlands. COG surveys and research show that woodland bird species continue to decline in abundance, including birds which are listed as threatened under Commonwealth and ACT legislation. The primary cause is the overall loss of woodland habitat and fragmentation of habitat, overlaid by a variety of other pressures and threats including urban related pressures.

COG is very concerned about the piecemeal way in which the ACT Government planning system operates and, with other community environmental groups, has advocated for a whole of landscape approach to planning in Throsby. This has not occurred. We are particularly worried about a large sporting complex on the agenda for

Throsby which would abut the Mulligan's Flat Sanctuary, destroy threatened species habitat (particularly Golden Sun Moth), and the impact this may have (from lighting, noise, disturbance, prescribed burning etc) on important research being undertaken in the reserves.

In the last few years, COG has undertaken surveys for Superb Parrot nesting trees within Throsby and the adjacent reserves, and is of the view that this area is a critical breeding area for these birds in the ACT. Indeed it is the major site for breeding pairs of these birds. We believe that some of this habitat (breeding trees and food trees) has already been destroyed with the establishment of the adjacent suburb of Harrison on the western side of Horse Park Drive. We argue that there are a number of key grounds supporting no further clearance of grassy woodland in Throsby, and that the ACT Government should not be allowed to develop there at all. Instead, the area could be managed for conservation under a suitable mix of extended reserve land and leasehold grazing, with grazing performing a function to reduce fuel loads against the urban edge.

Other reasons NOT to allow urban development in Throsby area:

- Throsby contains patches of woodland that would meet criteria for classification as endangered Yellow box /Red Gum (nationally known as White Box - Yellow Box - Blakely's Red Gum) grassy woodland community.
- The proposed development zone is an area of land bordering 2 large reserves (Mulligan's Flat/Goorooyaroo) which together comprise the largest patch of endangered grassy woodland in public hands. There is a major research study within the reserves on grassy woodland restoration, which could be impacted if Throsby is developed/urbanised.
- Golden Sun Moths (critically endangered) and Superb Parrots (vulnerable) breed within the proposed development zone.
- There are a number of ACT and Commonwealth threatened bird species which occur in the reserves or within Throsby: Superb Parrot, Swift Parrot, Hooded Robin, Varied Sittella, Brown Treecreeper, Regent Honeyeater, Painted Honeyeater, and White-winged Triller.
- Parts of Throsby represents a potential risk from wildfire, as urban areas would be surrounded on 3 sides by woodland reserves, with a very long edge to manage. This will mean significant pressures for greater prescribed burning within the reserves to protect houses and other urban infrastructure, destroying the important values of the reserves.
- There needs to be large buffers between these important woodlands and the urban area of Gungahlin, to allow for asset protection zones under the ACT's bushfire management plans; because of the shape of Throsby as a "neck" of land between the reserves, this will be impossible to achieve without those asset protection zones intruding into and destroying parts of the reserves.

- There will be adverse impacts associated with urban development/close urban presence of some 90,000 people living nearby, such as the increase in feral predators (cats, dogs), increase in abundance of aggressive birds which favour edge habitats (Noisy Miner and Pied Currawong and the introduced Common (Indian) Myna) and increased light and noise. Buffers therefore need to be significant.

Yours sincerely

Chris Davey
President
31 May 2011

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