

CANBERRA ORNITHOLOGISTS GROUP
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Environment Planning & Sustainable Development Directorate - Planning
ACT Government

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Development Application (DA 202138789, Block 1 Section 3, 99 Mugga Lane, Symonston – new crematorium and chapel (South Canberra Memorial Park))

The Canberra Ornithologists Group (COG) wishes to provide some comments in response to this DA. COG has a strong interest in the Callum Brae Nature Reserve on the boundary of the proposed development. The Callum Brae Nature Reserve is an important habitat for threatened and declining woodland birds, and one of COG's long-term bird monitoring/survey locations.

The Canberra Ornithologists Group (COG) is a volunteer-based community group with around 400 members, with a mission that includes the conservation of native birds and their habitats. COG plays an active role in advocating for the protection of native vegetation as bird habitat, and for the mitigation of threats to and impacts on native birds.

The Callum Brae Nature Reserve is an important area of high-quality lowland grassy woodland (Yellow Box/Red Gum), an endangered ecological community, recognised in the ACT Native Woodland Conservation Strategy 2019.

- This endangered ecological community supports habitat for eight bird species listed as threatened under the ACT *Nature Conservation Act 2014*, and several of these species are also listed under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act). The critically endangered Swift Parrot is one of the Commonwealth-listed birds recorded in Callum Brae NR.
- Other rare or uncommon woodland birds also occur in Callum Brae NR.

COG is, therefore, concerned about limiting any indirect impacts of this development on the nature reserve.

COG is also concerned about direct losses of mature eucalypts on the development site. The ACT has declared the loss of mature native trees (including hollow-bearing trees) as a threatening ecological process under the ACT's *Nature Conservation Act 2014*; the loss of hollows used by native fauna is a critical issue. It is unclear from the DA documentation if mature eucalypts with hollows or other values for biodiversity are to be retained on the site, or how many eucalypts are to be removed for this development.

If the DA is approved, COG recommends there should be appropriate Conservator's directions covering several matters relating to maintaining biodiversity values in the area:

- Minimising the overall loss of eucalypts across the site, and particularly ensuring the retention of large, hollow-bearing eucalypts consistent with the ACT Government's listing referred to above.
- Conditions for landscaping on the site such as:
 - use of suitable native plant species, to avoid the intrusion of undesirable or weed species into the sensitive nature reserve, and
 - retaining or incorporating features which enhance habitat value for biodiversity, such as suitable placed fallen timber/logs (e.g. from trees not retained), and areas of rocks.

There should also be consideration of measures to limit light spill off the site (as this can negatively affect wildlife) and to ensure there is adequate control of run-off/drainage from the site.

COG can be contacted on cogoffice@canberrabirds.org.au.

Yours sincerely



Neil Hermes
President
Canberra Ornithologists Group

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