

Representation for Current Development Application - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

Reference code

26 Aug 2022 5:54:16 AM

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Thank you for your representation regarding development application number: 202240416

The issues raised in your submission will be taken into consideration during the assessment of the development application and you will be notified in writing once a decision has been made.

Section 156(2) of the Planning and Development Act 2007 states that a representation about a development application must be made during the public consultation period for the application. If your representation was made outside the public consultation period it cannot be considered during the assessment of the application.

Please Note: A copy of your representation will be forwarded to the development application applicant and can be released to the public only on request, unless you have requested and been granted an exemption.

Access Canberra Environment and Planning
Directorate

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Representor details

Title

Given name *

Family name *

Ms

Jenny

Bounds

Organisation name

Canberra Ornithologists Group

Enter at least one phone number: *

Home phone number

Work phone number

Mobile number

0262887802

Email address *

jbbounds@bigpond.com

Development details

Development application number *

DA

202240416

Suburb *

Section *

Block *

Unit

THROSBY

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Representation

DA 202240416 – Estate Development Plan Throsby (district sports-playing fields)

The Canberra Ornithologists Group (COG) is dedicated to the study and conservation of native birds and their habitats. COG is a long-time community stakeholder in the Mulligans Flat Nature Reserve/Sanctuary adjacent to the proposed development (DA 202240416), having been a key contributor to saving of the reserve in the early 1990s. More recently, COG has contributed to the development of the Sanctuary and the reintroduction of species such as the Bush Stone-Curlew. Mulligans Flat is a very important national conservation and ecological research area.

Here are some brief comments relating to COG's general concerns about this development. We would be able to amplify any of these comments if required.

- This planning application requires a significantly high level of environmental scrutiny, given the national significance of the neighbouring Mulligans Flat Sanctuary, its endangered ecological communities and threatened species (including reintroduced populations), and the considerable research and education investment in the Sanctuary. Together with the adjacent Goorooyarroo Nature Reserve, this is the largest piece of endangered grassy woodland of its kind in public hands, and its environmental assets, experimental research programs, and environmental education facilities and programs are considerable assets to be protected.
- The proposed loss of mature eucalypts on the development site is of prime concern. The ACT Government has recognised the loss of mature trees as a threatening ecological process, and is finalising an Action Plan for better protection of mature trees. COG has submitted comments on the Draft Action Plan, encompassing:
 - o requirement of a tree retention plan for developments potentially impacting on mature trees, with this plan to prioritise the retention of trees and their long-term survival, particularly hollow-bearing trees
 - o retention of high-value and medium-value trees, the most valuable for biodiversity (and including hollow-bearing trees)
 - o justification provided to the ACT Conservator for any mature tree removals, including why development plans cannot accommodate retention of high-value and medium-value trees.
- Contemporary surveys of the potential use of trees for nesting by Superb Parrots (a listed species under the Commonwealth Environment Protection and Biodiversity Conservation Act) should be required and undertaken over a breeding season (whether or not similar surveys have been undertaken in the past).
 - o Superb Parrots have a major nesting colony close by to this proposed development, on Throsby Ridge in Goorooyarroo NR. Known nest-trees were removed for the Throsby housing development, and any additional impact will be cumulative. Any trees which could potentially be used for nesting by Superb Parrots should be retained in this development.
- In addition, indirect impacts on the adjacent Mulligans Flat Sanctuary and its values should be addressed in detail, and considered in light of the importance of the significant environmental, research and other values of the Sanctuary. The overall design of the development site must take into account its adjacency to the Sanctuary, be sympathetic to the landscape context, provide adequate buffers for the Sanctuary, and minimise opportunities for damage to the Sanctuary and its assets. Requirements include:
 - o minimising noise and lighting impacts on the Sanctuary's animals and the nationally significant research programs, with appropriate evidence-based mitigations proposed
 - o an adequate fire management buffer within the footprint of the development, to protect the Sanctuary's assets
 - o a weed management plan for the site to minimise intrusion of weeds into the Sanctuary
 - o minimising potential disturbance to the Sanctuary from access and human traffic. This disturbance will arise from the large numbers of people and activities which will be associated with a substantial sports/recreation facility, and the increased likelihood of vandalism on the Sanctuary fence and inappropriate activities occurring in the Sanctuary. In particular, there should be no access gates to the Sanctuary from the site.

Jenny Bounds
Conservation Officer, on behalf of
Canberra Ornithologists Group

26 August 2022

You may upload any additional supporting documentation or photos.

[Click here for more information on applying for exemption from the public register.](#)