

Canberra Ornithologists Group
PO Box 331
Jamison Centre ACT 2614
ABN 72 534 628 789



ACT Planning System Review & Reform Project
Environment, Planning & Sustainable Development Directorate
ACT Government

Draft Territory Plan & Draft District Strategies

The Canberra Ornithologists Group (COG) is providing some comments on the proposed planning reforms associated with the draft district strategies and the draft ACT Territory Plan.

COG is a volunteer-based community group with around 300 members whose mission includes the conservation of native birds and their habitats. COG plays an active role in advocating for protection of native vegetation/bird habitats and for the mitigation of threats to and impacts on native birds.

The comments do not cover all matters concerning the proposed changes to the Territory Plan, only those specifically relevant to COG's conservation priorities for birds.

Overview

COG considers that the proposed new approach to planning is overly compartmentalised. It is not linked to any Territory-wide strategic overview, and furthermore each district strategy is based on mapping at an unhelpfully coarse scale. This approach will not deliver the best outcomes for biodiversity conservation and ecological connectivity across the Territory or within individual districts.

The district strategies may be useful for planning urban neighbourhood and community facilities and infrastructure. However, they do not provide, or derive from, a holistic and integrated approach to environmental planning on a landscape scale. A more strategic approach to overall planning is needed to deliver improved outcomes for biodiversity conservation generally, and more specifically for threatened and declining woodland-dependent birds. Such an approach would need to explicitly reference, and incorporate, other Territory planning instruments such as the Loss of Mature Native Trees Action Plan.

COG recommends, therefore, that these proposed changes to the Territory planning system be reconsidered, and that priority areas for biodiversity conservation and habitat connectivity are identified early in the planning process and presented as a layer or overlay to the Plan. This could be in the form of a 'biodiversity conservation network' or biodiversity overlay in the Territory Plan that includes both formal reserves and off-reserve areas identified for management for conservation. There is a particular need in this process to identify rural and urban fringe land for conservation management (whether or not such areas are to be incorporated into the ACT reserve system). The

identification of areas for conservation management needs to be underpinned by evidence-based approach and needs to be applied across all district plans.

As a key part of this approach, COG considers there is a need for more detailed mapping of remnant vegetation and habitat corridors, and mapping areas of significant ecological value or where connectivity can be restored. This is required to ensure that significant areas of ecological value are protected from urban development and associated infrastructure. In addition, areas of ecological value need to be protected from urban-edge effects and the impacts of adjacent development, through functional, evidence-based buffers. Currently, however, there is only a general, 'motherhood' statement about buffers in the documentation underpinning the draft district strategies. This approach then needs to be applied consistently across the individual district strategies.

Mature Native Trees Protection

The ACT Government has declared the loss of mature native trees as a threatening ecological process and has developed an Action Plan for their protection. COG supports the intent, principles and the various strategies/actions outlined in the Action Plan, but does not consider the Action Plan goes far enough to effectively protect such trees with respect to greenfield planning. The Action Plan should mandate measures to protect existing mature native trees at greenfield sites.

Also, there should be Instruments in planning legislation that mandate protection of mature native trees. In particular, early scoping and assessment of mature native trees before urban planning should be mandated in relevant planning policy and legislation. A full and proper understanding of the constraints on a greenfield site/development before any urban planning even starts is fundamental to ensuring the best outcomes for birds and other biodiversity.

- Legislative instruments, including the *Planning Act* and *Urban Forest Bill/Act*, need to state clearly the requirements for protecting mature trees at the start of any consideration of a greenfield future urban area.
- Surveys and assessments for mature native trees should be undertaken at the initial stage of greenfield site consideration, and details of the environmental and other information needs to be gathered must be specified through relevant legislation, eg in EIS scoping requirements or via enhanced Tree Survey Guidelines. Protection of mature trees has to be a pre-requisite of any future urban development.
- Mitigation measures to protection mature native trees at the EIS or DA stage is too late in the process.

Molonglo District Plan

Before urbanisation, the Molonglo River valley was regarded as a biodiversity hotspot in the ACT, particularly for birds of prey. However, the Molonglo District is now considered by many community experts to be poor urban planning in a sensitive river corridor/valley, where an inadequate buffer was provided for the river reserve, and habitat connectivity was compromised.

The compartmentalised approach encouraged by these draft district plans ignores the critical east-west connectivity of the Molonglo District to the Murrumbidgee River corridor. The Western Investigation Area land (west of the Denman-Prospect boundary) is not considered in the district plan even though these areas directly abut.

As a consequence, this approach specifically ignores areas such as Bluetts Block (Stromlo Blocks 402 and 403) that are outside but adjacent to the district map, and that have direct ecological connection to adjacent areas within the district. Denman Prospect Section 1 Block 12 (within the district map) should be identified as an area of significant ecological value in the Molonglo District Plan because of

the buffer it provides to Bluetts Block, as well as for its own intrinsic values. It makes no ecological sense to consider each district independently of lands at their border, and independent of any strategic Territory overlay.

COG's view, also strongly supported by the community, is that Denman Prospect Section 1 Block 12 should be incorporated into nature reserve along with the adjacent Bluetts Block outside the district map. Those blocks are regarded as having vegetation in better condition and with more significant flora and fauna biodiversity values than some of the existing nature reserves in the Canberra Nature Park.

Inner South District Plan

The Jerrabomberra Wetlands Nature Reserve is the premier wetlands bird habitat in the ACT, with significant biodiversity values. More than 80 species of waterbirds have been recorded in the wetlands, and around 170 bird species in total have been recorded using the wetlands habitat. It is the most important habitat in the ACT for Latham's Snipe, a migratory wader protected under International and Commonwealth threatened species legislation, and also provides habitat for other bird species on Commonwealth, ACT and NSW threatened species lists. Jerrabomberra Wetlands is therefore of national importance as an important drought refuge for water-based species, and a critical seasonal habitat for threatened, migratory bird species.

There should be appropriate buffers and other measures to mitigate urban edge effects from encroaching new urban development, both from Kingston East and Dairy Road.

Belconnen District Plan

A large area of land, the Central Molonglo, north of Kama Nature Reserve (part of the Molonglo River Reserve) is shown on the district map as 'open space'. This is very misleading, and implies the area is potentially available for use for development. In 2010, the ACT Government varied the Territory Plan to permanently remove the Central Molonglo land/area from being a future urban area, recognising its environmental importance.

It is of concern that several blocks have since been ear-marked in this area for 'infrastructure'. Different locations should be found for these infrastructure proposals.

Mapping should designate the Central Molonglo area as a 'conservation managed zone', and part of a wider 'biodiversity conservation network' (see above). Conservation management principles should be applied as part of land management agreements, including for the protection and enhancement of a key breeding site and trees for the threatened Superb Parrot, and to ensure habitat connectivity (east-west) to the Molonglo and Murrumbidgee Rivers.

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

Yours sincerely



Neil Hermes
President Canberra Ornithologists Group
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