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## **OBJECTION TO DEVELOPMENT APPLICATION 202342296**

The Canberra Ornithologists Group (COG) wishes to submit an objection to Development Application 202342296. We request that the proposal in the DA be rejected, or at the least be put on hold until community stakeholder consultation occurs.

It is unclear how this proposal can be justified in terms of important biodiversity-related considerations in a whole-of-landscape conservation approach.

There are potential indirect impacts in placing a very large, unnatural water body with associated recreational plantings, in proximity to endangered grassy woodland and natural temperate grassland ecosystems with high biodiversity values. This is likely to attract a greater number of large, urbanadapted birds (such as Currawongs, Magpies) and aggressive Noisy Miners to the area and into the Kama Nature Reserve woodland. These species are likely to have negative impacts on small woodland birds in the Reserve and it will change the bird fauna mix in the Reserve. Studies show that small woodland birds as a group are declining.

We have become aware of this DA only in the last few days. There is not sufficient time or opportunity to consider the very large amount of documentation lodged with the DA, or to give a full and detailed response.

It should be noted that COG has had an active interest in Molonglo Valley urban planning for more than a decade, due to the significant impacts on biodiversity values in a sensitive river corridor, and particularly in relation to bird fauna in the Valley. COG has been opposed to any housing development from the Kama Nature Reserve to the Deep Creek drainage line, reflected in its submissions relevant to planning in Molonglo and with respect to the plans for the suburb of Whitlam which abuts the reserve. COG advocated for a wide natural buffer area to Deep Creek to minimise urban-related and indirect impacts on the Kama Nature Reserve and its bird fauna. COG maintains its view that the Kama NR buffer subsequently determined is not consistent with conditions specified in the Matters of National Environmental Significance - MNES Plan - September 2011, as environmental considerations and protections have not been given proper weight or precedence.

Relevant points COG would like to make in the limited time available are below.

 The DA was publicised during a main holiday period (Xmas/New year/January), when there is limited opportunity for community stakeholders to become aware of the DA, or digest the very large amount of documentation, or to discuss with colleagues and respond. Also, it is not at all apparent from the DA title what the DA actually concerns since it is listed as Hazel Hawke Avenue/Sculthorpe Avenue.

- There has been no consultation with community stakeholders (including the Conservation Council ACT and its member groups, particularly Friends of Grasslands and Canberra Ornithologists Group), about what is a significant change in the landscape at a very late stage in planning.
- Proposals for significant infrastructure in Whitlam such as a large water body/dam drowning a
  natural ecosystem/drainage line were not included in the original Molonglo planning/EIS
  documents or indeed in the plans previously released for the suburb of Whitlam. Such a
  significant matter should have been included in previous EIS exercises/Molonglo planning
  phases, which go back over more than a decade. This very late planning change by way of a DA
  released at a holiday time without full and proper community consultation is completely
  unacceptable.
- The area includes potential habitat of the Vulnerable Pink Worm-tailed Lizard.
- The natural drainage line is stable and should be retained in a natural state as native habitat for biodiversity; this is largely native grasses, rocks and other substrates which provide various micro habitats and a movement corridor.

Yours faithfully

Kim Farley

Vice-President Canberra Ornithologists Group

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