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To:

ACT Planning and Land Authority
Application Secretariat

Submission regarding:

**DA200915605
Part Block 2 and Block 3, Section 75 Watson**

The Village Building Company proposes to redevelop Block 3 Section 75 (the Australian Heritage Village) and part of Block 2 Section 75 (which is or which was unleased Territory Land) as medium dense residential development comprising more than 300 dwellings.

The project site directly abuts the Mount Majura Nature Park section of Canberra Nature Park in the east and the southeast. The project site contains remnant Yellow Box Red Gum Grassy Woodland listed under ACT *Nature Conservation Act (1980)* and the Commonwealth *Environment Protection and Biodiversity Conservation Act (1999)*. The remnant within the project site consists of scattered mature trees (habitat trees) and patches of regenerating woodland in the southern corner of the subject site.

Mount Majura Nature Park is a critical component of the ACT reserve system to protect endangered grassy woodland that occurs on the lower slopes and listed and declining woodland species that depend on this habitat. Mount Majura Nature Park and adjacent woodlands not formally protected under legislation form part of the east Canberra wildlife corridor connecting habitat in the south with the grassy ecosystem habitat in the north. This corridor has been acknowledged in the *Canberra Spatial Plan (2004)* and in the *ACT Lowland Woodland Conservation Strategy (2004) (Action Plan 27)*.

The recently launched “Bush Capital Legacy. Plan for Managing the Natural Resources of the ACT” (ACT Natural Resource Management Council 2009) lists as the first and second issues of immediate concern in the ACT:

- Urban expansion – threatening remaining areas of woodland and grassland and species that depend on them;
- Fragmentation – resulting in at-risk plants and animals only occurring in less viable isolated pockets

The proposed development DA200915605 will destroy remnant endangered woodland, remove significant and exceptional high habitat value trees and increase the fragmentation of remaining woodland. The proposed development will impact on the formally protected endangered grassy woodland of the adjacent Mount Majura Nature Park and increase the risk to viable populations of fauna that depend on these woodlands.

Friends of Mount Majura (FoMM) consider the proposed development DA200915605 totally inappropriate in terms of the location and in terms of the scale. We strongly object to the DA200915605 as the proposed residential development with a hard edge to Mount Majura Nature Park threatens the conservation values within the nature park and destroys endangered grassy woodland within the project site.

FoMM has great concerns in regard to the impact of the development on the conservation values of the endangered box gum grassy woodlands of the north-west slopes of Mount Majura Nature Park. Our concerns relate to the impact of suburban interface with remnant woodlands that provide habitat to the highest number and species diversity of woodland birds within the Mount Majura Nature Park. Our experience from working at an existing suburban nature park interface is that it is very difficult to limit damaging activities such as dumping garden and other waste, walking dogs off leash, straying cats, etc. not only because of the lack of resources but also because pest species often benefiting from and thriving in human environments.

Furthermore we are concerned about the loss of listed endangered ecological community and components such as habitat trees in the southern area of the proposed development. Apart from the important habitat function of mature and dead hollow bearing trees which are subject to removal these trees provide connectivity to the Watson woodlands on the west side of Antill Street.

A further great concern is that residents living in the proposed development are exposed to a potentially increasing (climate change!) fire hazard risk. We are afraid that the management to reduce future fire hazard risk will take place in the Nature Park regardless of the impact on functioning ecosystems.

The proponent states that Mount Majura Nature Park provides a “high amenity area” adjacent to the proposed development that “encourages ... outdoor activities” and we assume that the proponent plans to use the high amenity of Mount Majura in a marketing campaign, should the development go ahead. There is a significant lack of infrastructure such as formed tracks to cater for

(increased) outdoor use of this part of Mount Majura Nature Park. In addition there are inadequate resources to manage current use let alone increased use not only in this part of Mount Majura Nature Park but across the whole Canberra Nature Park System. We are concerned that given the lack of infrastructure and management resources the praised recreational outdoor activities will threaten the integrity of the natural environment and negatively impact on species, habitat and endangered ecological community. The protection of these values is the first management objective of Canberra Nature Park.

FoMM regrets that the DA200915605 has been exempted from the requirement of an Environment Assessment on the request of the proponent. As far as we are aware this exemption was triggered by studies carried out in conjunction with the Draft Variation of the Territory Plan 261. The Flora and Fauna study was carried out on two days, on one day in August 2004 and on one day in October 2004. FoMM considers these studies insufficient to assess the impact the proposed project will have on the conservation values.

FoMM objects to the proposed development. However, as we are realistic about the prospect of further suburban encroachment we insist on the following conditions which we think to be crucial if the negative impacts of this proposal on the endangered woodlands are to be minimized:

- significantly scale down the development project, in particular
- exclude the Yellow Box Blakely Red Gum grassy woodland in the south of the proposed development area from development;
- save all significant native habitat trees on the site, in particular
- save the significant exceptional high habitat value yellow box tree close to Antill Street which is proposed for removal – this tree is an important habitat tree that provides a link to the woodlands west of Antill Street;
- provide more open public space within the development area and / or provide pedestrian links to public open space that can be used for activities like walking dogs, with the aim of preventing misuse of the adjacent nature reserve;
- set up a community engagement program to educate residents about living at the interface with Mount Majura Nature Park;
- implement all storm water and fire management measures strictly within the development site – further encroachment into the Mount Majura Nature Park as proposed by the proponent is completely unacceptable;
- implement management measures to avoid an increase of kangaroo-car collisions and road kill on Antill Street as a result of increased traffic;
- implement a cat-free or cat-containment policy;
- implement a no-dog policy within the northwestern part of the Mount Majura Nature Park;
- provide infrastructure such as a fence, a clear entry point with interpretative display and a network of formed tracks to avoid trampling native vegetation including listed flora;

- request funding contributions by the proponent towards the implementation of infrastructure and for the continued maintenance of the reserve to cater for increased use of the northwest part of Mount Majura Nature Park.

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