



National Parks Association of the ACT Inc.

conservation education protection

Submission on the Lawson North Residential Development (2022/09298)

The National Parks Association of the ACT (“NPA ACT”) welcomes the opportunity to comment on the Defence Housing Authority (DHA)’s Lawson North Residential Development (the Proposal) under the Environment Protection and Biodiversity Conservation (EPBC) Act.

The NPA ACT is a community-based conservation organisation with more than 400 members and has more than 60 years of experience in helping to protect our natural environment, particularly in the ACT and surrounding regions.

Comments

The NPA ACT strongly objects to the Proposal.

The Proposal will lead to the destruction of 15.8 hectares of Natural Temperate Grassland of the South Eastern Highlands (NTG), a critically endangered ecosystem under the EPBC Act), 1.31 hectares of White Box-Yellow Box-Blakeley’s Red Gum Grassy Woodland and Derived Native Grassland (Box Gum Woodland) which is also critically endangered as well as a further 6.41 hectares of other native bush.

In addition, two other Threatened species will be directly impacted, being:

- Golden Sun Moth (*Synemon plana*) listed as Vulnerable under the EPBC Act and as Threatened under the ACT’s Nature Conservation Act (NC Act); and
- Striped Legless lizard (*Delmar impar*) listed as Vulnerable under both the EPBC and NC Acts.

DHA’s referral documentation lists a further 6 Threatened species that may occur on the site of the Proposal.

The importance of these ecosystems and species calls into question the appropriateness of the Proposal. In particular, only 0.2% of the original expanse of NTG is protected in nature reserves or national parks. The Proposal site incorporates one of the largest extant area of unprotected NTG in the ACT. Any loss of NTG is significant from a national perspective.

If the Proposal progresses it will further heighten the biodiversity emergency identified in the most recent national Statement of the Environment report.

The DHA’s development site is subject to a development control plan (DCP 12/09) established by the National Capital Authority (NCA). The DCP 12/09 recognises that

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precincts D and E of the Proposal should be set aside for conservation and heritage purposes. However, these areas will be either destroyed or indirectly by the Proposal.

A main factor in the environmental impact of the Proposal is its size. The Proposal is for the creation of approximately 443 dwellings ostensibly to provide housing for Defence Personnel. However, only 150 of these dwellings will be used for Defence purposes while the rest will be sold on the open market. To accommodate these additional dwellings, construction needs to occur in NTG and grassy woodland sites.

In addition, the size of the development creates fragmentation of the remaining NTG sites and exposes them to edge effects. These effects include the potential for feral plant and animal invasion, a higher risk of fire, greater human disturbance and the impacts of sediment run-off. These edge effects place additional pressure on remaining areas of NTG and grassy woodlands, further reducing their long-term viability potential.

DHA's referral documentation fails to adequately address how it will avoid or mitigate the Proposal's detrimental effects on the environment. It provides no substantive basis for its proposed destruction of critically endangered ecosystems other than it thinks the area affected is small. However, as previously discussed, all remaining areas of NTG and grassy woodlands are important for the survival of these ecosystems.

DHA's documentation provides no substantive reasons to why this development has occurred on critically threatened ecosystems and species. DHA's developer attitude has meant that other sites in the ACT and region that could have been used for housing Defence personnel have had majority non-Defence components. Just because this has happened does not justify the destruction of important sites of natural heritage.

Should you require any further information on our comments or our organisation, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee.

Yours sincerely

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President



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Convener, Environment Sub-committee

National Parks Association of the ACT

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