

6 September 2022

**Submission to the Minister for Environment and Water, the Hon. Tanya Plibersek MP -
Lawson Grasslands Residential Development** 

Dear Minister Plibersek,

Thank you for the opportunity to comment on Defence Housing Australia's application to develop the Lawson Grasslands (ACT) for Defence housing and public sale. The Australian Conservation Foundation (ACF) submits that this proposed action has clearly unacceptable impacts. As a result you **should not grant permission for this proposed development to proceed.**

About ACF

ACF is Australia's national environmental organisation. We represent a community of more than 700,000 people who are committed to achieving a healthy environment for all Australians. For more than 50 years, ACF has been a strong advocate for Australia's forests, rivers, people and wildlife. ACF is proudly independent, non-partisan and funded by donations from our community.

Submission overview and recommendations

ACF is concerned about the proposed development to build approximately 416+ houses on Lawson Grasslands. This proposed development has clearly **unacceptable impacts** on matters of national environmental significance, namely on Natural Temperate Grasslands and Box-Gum Woodlands - both nationally listed as Critically Endangered ecological communities - and on threatened plant and wildlife species that call Lawson Grasslands home.

Our submission is structured around the following recommendations:

1. Recognise that the proposed development has unacceptable impacts on Natural Temperate Grasslands. Natural Temperate Grasslands (NTGs) are recognised as likely being the most threatened ecosystem in Australia and are considered Critically Endangered under the EPBC Act. Nationally, approximately 0.5% of NTGs remain in good condition. Around 5% of the ACT's NTGs remains in moderate to good condition and Lawson Grasslands is the only remnant of NTG remaining in the Belconnen region. Lawson Grasslands is recognised as a Conservation Significance Category 1 site for its high ecological condition and provision of key threatened species habitat.



The proposed action would see 15.8 hectares of listed NTG cleared and therefore amounts to the destruction of an ecological community that is a matter of national environmental significance.

2. Recognise that the proposed development has unacceptable impacts on Box-Gum Woodland.

Lawson Grasslands is also home to Box-Gum Woodland, another ecological community that is considered Critically Endangered under the EPBC Act. This is recognised in Defence Housing Australia's own Biodiversity Impact Assessment for this proposed development. More than 95% of Box-Gum Woodland nationally has already been cleared for agriculture and development and what remains is largely degraded and fragmented.

The proposed action would see 1.31 hectares of Critically Endangered Box-Gum Woodland destroyed. ACF believes this constitutes an unacceptable impact on a matter of national environmental significance at Lawson Grassland.

3. Keep Lawson Grasslands intact for the multiple threatened species that persist there. Lawson Grasslands is recognised for its important role protecting native, threatened and rare species. It is the only grassland larger than 100 hectares in the Belconnen region that is listed as a Conservation Significance Category (CSC) 1 site for the following species:

- Golden Sun Moth (Critically Endangered under EPBC)
- Striped Legless Lizard (Vulnerable under EPBC)
- Perunga Grasshopper (Endangered under NCA)
- Button Wrinklewort (Endangered under EPBC)
- Ginninderra Peppergrass (Vulnerable under EPBC)

It also supports several bird species listed under the EPBC Act including the migratory Latham's Snipe, the Gang Gang Cockatoo and Superb Parrot. Not only would this proposal destroy swathes of habitat entirely, it would also fragment the land, preventing species such as the Striped Legless Lizard from moving across it and could push already threatened species closer to extinction.

4. Reinforce protections for Lawson Grasslands as defined by the National Capital Authority's Development Control Plan. In 2013, the National Capital Authority (NCA) recognised and sought to protect the natural values of Lawson Grasslands under a Development Control Plan (DCP 12.09). The DCP identifies areas of the Lawson Grasslands that are for "heritage and nature conservation only" (e.g. Precinct D) and yet the proposed development would see NTG destroyed in these areas and therefore not respect the confines of DCP 12.09.



The natural value of Lawson Grasslands is undisputed and well-documented. The threatened and rare ecological communities and species that make up this site warrant protection. We urge you to reject DHA's unacceptable proposal to destroy 23.52 hectares of native vegetation and impact 47.16 hectares of ecosystem at Lawson Grasslands.

Kind regards,

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