

Territory Plan Comments GPO Box 158 Canberra ACT 2601

To whom it may concern

Re: Planning and Development (Draft Variation No 351) Consultation Notice 2015

Ginninderra Catchment Group has the following comments to make in relation to Draft Territory Plan Variation (DV 351):

- Firstly, we would like to commend the Riverview Group on their management of the consultation process, their efforts to assemble the relevant information and their commitment to making sure that the development be as sustainable as possible.
- We commend the proponent's agreement to establish a 'Bush on the Boundary' group
  that will provide a forum for addressing issues relating to the urban/bush interface as
  well as the continued commitment to for the Ginninderra Falls Biodiversity Working
  Group. We look forward to working together with the proponent in forums such as these
  in the future.

Ginninderra Catchment Group have some concerns relating to the Draft Territory Plan Variation (DV 351) outlined below:

• Whilst the commitment to protect threatened species and ecological communities within the proposed reserve area is very much commended and supported, we have some concerns about the convoluted nature of the boundary. This proposed boundary does not adhere to well-established principles of best practice in relation to reserve design (e.g. maximising ratio of area/perimeter of reserve) and is likely to present challenges for the future management of the proposed reserve. Having more edge in relation to area increases a range of edge effects (e.g. favours pest animals and weeds). This will have impacts on the ecological values, species and communities that the reserve aims to protect. There will also be likely logistical problems associated with a boundary such as the existing one (e.g. more difficult to land managers to fence and maintain the edge). We recommend that further work and consultation is undertaken in order to maximise the reserve size and area/perimeter ratio so that the future reserve will be in keeping with ecological principles of optimal reserve design.

Yours faithfully

Kat Ng GCG Convenor