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DPA-14

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Submission objecting to Draft Major Plan Amendment DPA-14

Belconnen Green Waste Recycling Facility and Bulk Landscape Supplies – Block 1653 Belconnen

To the Territory Planning Authority,

I wish to lodge an objection to Draft Major Plan Amendment DPA-14.

My objection is not based on opposition to green waste services, recycling activities, landscaping supply operations, or supporting infrastructure. Rather, my concern is that DPA-14 seeks to establish a permanent planning framework for uses that currently operate under a temporary approval pathway, while relying substantially on investigations, assessments and strategic planning work prepared through earlier planning processes. The material released by the ACT Government does not clearly demonstrate why those earlier investigations remain sufficient, current and site-specific for the permanent amendment to the Territory Plan now proposed.

1. DPA-14 seeks a permanent planning outcome where only a temporary use has been approved

The Supporting Report confirms that the site currently benefits from a temporary approval:

"The site is subject to an approved Development Application (DA Reconsideration 202240118) to facilitate the operation of a green waste facility as a temporary use for a three-year period."

The Supporting Report also states:

"At the time the DA was approved, a permanent facility could not be considered as the uses were not permitted. DPA-14 would enable the permanent operation of the facility at the site."

This demonstrates that DPA-14 is not simply recognising an existing permanent activity. Rather, it seeks to amend the Territory Plan by introducing "recycling facility" and "bulk landscape supplies" as assessable uses on Block 1653, thereby creating a pathway for permanent operation that was not previously available.

Given the significance of a permanent planning outcome, the evidentiary threshold should be higher than that relied upon for a temporary approval. However, the Draft Major Plan Amendment and Supporting Report do not clearly identify what additional assessment has been undertaken specifically to justify the transition from temporary use to permanent planning status.

2. DPA-14 relies on earlier planning investigations

The Supporting Report identifies the 2022 Design Options Study and investigations undertaken for DA202240118, including a Traffic Impact Assessment, as key supporting material for DPA-14.

The ACT Government's correspondence with the National Capital Authority further confirms that extensive site-selection work was undertaken through the October 2022 Design Options Study and that Block 1582 was identified as the preferred short-term location for relocation of the green waste facility.

The issue is not that earlier studies exist. The issue is that the current proposal seeks a permanent amendment to the Territory Plan, yet the supporting material does not clearly demonstrate:

- whether those investigations were prepared specifically for the permanent planning outcome now

proposed;

- whether they have been reviewed or updated for DPA-14;
- whether their assumptions remain current; or
- what additional assessment has been undertaken since those earlier processes.

Accordingly, the evidentiary basis linking those earlier investigations to the permanent planning outcome now proposed remains unclear.

3. The 2022 Design Options Study has not been demonstrated to remain current

A central justification advanced in the Supporting Report is that Block 1653 was identified as the preferred location for the facility through the 2022 Design Options Study. The NCA correspondence also states that the study identified Block 1582 as the "only viable site within Belconnen in the short term".

However, neither the Draft Major Plan Amendment nor the Supporting Report clearly explain:

- whether the assumptions of the 2022 study have been reviewed;
- whether its findings have been validated for the purposes of DPA-14;
- whether changing planning circumstances have been considered; or
- whether the study was prepared to support a permanent Territory Plan amendment rather than earlier development application processes.

Given that the "only viable site" conclusion forms a major component of the justification for the amendment, the community should be provided with a clear explanation of why a study prepared in 2022 remains the appropriate evidentiary basis for a permanent planning decision in 2026 and justify why new site study has not been undertaken to confirm their position this is the "only viable site".

4. Supporting studies were prepared for earlier development proposals rather Than a Territory Plan Amendment

The additional technical documentation released with DPA-14 confirms that many of the principal investigations were undertaken during 2021 and 2022 for Block 1582 and to support earlier site-selection and development application processes. These include:

- the Ecological Review dated December 2021;
- the Aboriginal Cultural Heritage Assessment dated December 2021;
- the Traffic Impact Assessment dated April 2022.

Importantly, the Traffic Impact Assessment expressly states that it was prepared to support the submission of a Development Application for the proposed relocation works.

Similarly, the Aboriginal Cultural Heritage Assessment assessed a specific proposed project footprint and selected development option for a green waste recycling and composting facility.

A Development Application assesses a specific proposal and development footprint. A Territory Plan amendment, by contrast, creates an ongoing statutory planning framework that may enable future development proposals.

The supporting material does not clearly demonstrate why studies prepared for earlier development proposals, earlier site configurations and specific development footprints remain sufficient, current and appropriate for the broader and more enduring planning outcome now proposed through DPA-14.

5. Traffic evidence relies on historic assumptions

The Traffic Impact Assessment was completed in April 2022 and relied upon earlier traffic modelling and

studies dating from 2015, 2016 and 2017, together with traffic assumptions provided during 2021.

The supporting material does not clearly identify whether this traffic evidence has been updated to reflect current circumstances or whether the assumptions remain valid for the purposes of a permanent amendment to the Territory Plan.

Given the continued growth of surrounding development areas, greater clarity should be provided regarding the continuing applicability of these earlier assumptions.

6. Strategic benefits do not replace site-specific justification

The Draft Major Plan Amendment places considerable emphasis on strategic objectives, including:

- supporting housing delivery;
- reducing constraints on Ginninderry;
- supporting resource recovery;
- facilitating circular economy outcomes; and
- providing infrastructure for a growing city.

While these are legitimate planning considerations, strategic benefits do not automatically establish that a permanent amendment to the Territory Plan is justified for a particular site.

Indeed, the NCA correspondence expressly refers to urgency relating to housing supply and removal of environmental clearance zone constraints affecting land release.

Urgency may explain why a project is desirable, but it does not remove the need to demonstrate that the evidence supporting a permanent Territory Plan amendment is current, site-specific and appropriate.

7. Public consultation occurs before referral authority advice is available

The Draft Major Plan Amendment states that consultation with mandatory referral entities, including the National Capital Authority, Environment Protection Authority, Conservator of Flora and Fauna and Heritage Council, is being undertaken concurrently with public consultation, and that comments received will be included in a later consultation report.

As a consequence, members of the public are being asked to comment on the amendment before having access to potentially important technical advice from key government agencies.

This limits the ability of the community to make fully informed submissions on whether the amendment is supported by adequate evidence.

Requested Outcome

I respectfully request that DPA-14 not be approved until the Territory Planning Authority:

1. Demonstrates what additional assessment has been undertaken specifically to justify permanent operation of the facility.
2. Clearly identifies all studies relied upon in support of the amendment and the purpose for which they were prepared.
3. Distinguishes between investigations prepared for earlier development applications and those prepared specifically for DPA-14.
4. Explains why investigations prepared during 2021–2022 remain current and appropriate for a permanent Territory Plan amendment in 2026.

5. Provides greater transparency regarding the evidentiary basis for the conclusion that Block 1653 is the preferred or only viable site and the refusal to re-evaluate other alternative locations.
6. Publishes and considers mandatory referral authority advice before a final recommendation is made.
7. Provides a clear evidence trail linking the permanent planning outcome now proposed to current, site-specific assessment.

Conclusion

The central issue is not whether Canberra needs green waste services.

The central issue is whether DPA-14 has established an adequate evidentiary basis for converting a use currently available to operate under a temporary approval pathway into a permanent planning outcome without undertaking the required studies to support a permanent change.

The ACT Government's own documents confirm that the amendment relies substantially on studies and investigations undertaken during 2021 and 2022 for Block 1582 and earlier development application processes, including the Ecology Review, Aboriginal Cultural Heritage Assessment, Traffic Impact Assessment and 2022 Design Options Study. They also confirm that permanent operation was not previously permissible and that the current operation exists only through a temporary approval pathway.

In the absence of a clear explanation demonstrating why those earlier investigations remain current, site-specific and sufficient for the permanent Territory Plan amendment now proposed, I object to DPA-14 and request that it not be approved.

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Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [**\(02\) 6207 1923**](#) to arrange a copy for purchase.

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Submission on Draft Major Plan Amendment 14 - Belconnen Green Waste Recycling Facility and Bulk Landscape Supplies – Block 1653

I strongly object to Draft Major Plan Amendment 14 (DPA-14).

As a resident of Strathnairn, I chose to live in Ginninderry because of its vision as a sustainable, family-oriented community that values its natural environment, sustainable and healthy lifestyles and high quality urban design. The proposal to facilitate a large industrial green waste recycling facility immediately adjacent to this growing residential area is fundamentally inconsistent with that vision.

My concerns extend well beyond the planning amendment itself. DPA-14 represents the culmination of a decision-making process that has failed to properly consider alternative sites, failed to meaningfully engage with the community, and failed to demonstrate that this location is the most suitable option for a regional-scale waste facility.

Odour and residential amenity

One of my primary concerns is the impact of odour on nearby residents. Green waste recycling facilities process significant volumes of organic material. Regardless of management practices, these facilities have the potential to generate unpleasant odours, particularly during warmer weather or when material is stockpiled or composting. Residents of Strathnairn, Macnamara, Holt in the surrounding area should not be expected to accept ongoing impacts on their ability to enjoy their homes, gardens, parks and outdoor spaces.

In a meeting with residents at the Link in Strathnairn on 2 July 2026, ACT No Waste staff confirmed that, if approved, there will be no planned or structured odour monitoring by ACT government agencies of potential odours resulting from the green waste facility.

The Government has not demonstrated that odour impacts can be effectively avoided over the long term, particularly as the facility expands or as surrounding residential development continues. This is particularly concerning, given the findings of a recent Public Health Inquiry by the Queensland Government into the odour issues at the Swanbank and New Chum industrial areas, following concerns raised by the community: <https://www.health.qld.gov.au/research-reports/reports/review-investigation/swanbank-public-health-inquiry>

Communities surrounding Swanbank experienced persistent odour problems associated with waste and industrial activities over many years. Those impacts were significant enough to contribute to a Public Health Inquiry because odour was affecting residents' quality of life, wellbeing and confidence in regulatory oversight. Importantly, Queensland Health's Public Health Inquiry acknowledged that even where measured pollutant concentrations do not exceed formal health standards, persistent odour can still have real and adverse effects on people's wellbeing and daily lives.

Bushfire risk

The proposed location also raises significant bushfire concerns. Large stockpiles of green waste are recognised as a fire risk. They can generate heat internally, are difficult to extinguish if ignited, and have the potential to produce large quantities of smoke over extended periods.

The proposed green waste facility is located within a known bushfire-prone area which is subject to elevated bushfire risk and immediately adjacent to growing

residential communities and important environmental assets. The cumulative risk created by introducing a major green waste processing operation into this landscape has not been adequately assessed, explored and weighed against the benefits of the proposal.

Residents deserve confidence that emergency services, evacuation planning and fire management have been comprehensively assessed before this type of facility is approved.

Traffic and inadequate infrastructure

The road network serving Strathnairn, Macnamara and surrounding suburbs in West Belconnen is already under increasing pressure from rapid population growth and road upgrades are not keeping pace with growth.

The proposed facility will generate additional heavy vehicle movements on roads that are increasingly used by local residents, cyclists, pedestrians and families. Increased truck traffic will impact safety, congestion, noise and road maintenance.

Rather than investing in transport infrastructure that supports the rapidly growing Ginninderry community, Government resources are being directed towards facilitating an industrial development that many local residents neither want nor support.

The existing infrastructure challenges experienced by residents, including road capacity, public transport, shops, community facilities and local services, should be addressed before introducing additional industrial traffic into the area.

Government priorities and use of public resources

I am deeply concerned about the amount of Government time, effort and public funding being devoted to progressing this proposal, exacerbated by successive poor planning decisions, despite sustained and significant community opposition.

Over several years, considerable public resources have been committed to an inadequate site options study, consultant reports, planning work and statutory processes aimed at enabling this single development.

At the same time, residents continue to wait for essential infrastructure and services that should be available for a fast growing community, including improved public transport connectivity, community facilities, recreational infrastructure and other investments that directly improve residents' quality of life.

It is difficult to understand why progressing this proposal has become such a Government priority when there are clearly competing community needs that would deliver much greater public benefit.

DPA-14 proposes a land use much broader than the proposal approved by the National Capital Authority (NCA)

The DPA-14 supporting documents include correspondence between the Suburban Land Agency and NCA seeking, and providing endorsement for, "a permanent green waste facility and bulk landscape supplies on Block 1582 Belconnen". However, DPA-14 is in fact a proposal to add the much broader "recycling facility" land use to Block 1653, not 1582. This raises serious concerns about the veracity of the information provided by the ACT Government to the NCA in order to obtain endorsement to proceed with DPA-14. The complete briefing and documentation provided by the SLA to the NCA should be closely examined by the Planning Authority, and should be made available to the public.

Lessons from the ACT Auditor-General's Phillip Pool Audit Report

In 2023 the ACT Government changes to the Territory Plan amended requirements for the Phillip Pool site, which allowed for the 50-metre outdoor pool to be replaced by a 25-metre indoor pool and additional aquatic facilities, if the site was redeveloped.

The June 2026 ACT Auditor-General's report into changes to the Territory Plan requirements for the Phillip Pool (Report No. 7/2026) provides important lessons that are directly relevant to DPA-14.

Although the projects are different, the core planning issues are the same: whether the Government has properly identified the need for the change, whether it has genuinely tested alternatives, and whether the community has been given accurate information about the basis for the proposal.

The Auditor-General found that:

- there was *no rigorous or specific analysis of community needs or options* to support the planning changes;
- consultation material *misrepresented the extent of analysis* underpinning the proposal;
- Government agencies should ensure community needs are properly identified, documented and considered before changing planning requirements; and
- consultation processes must provide *accurate and complete information* so the community can participate meaningfully in planning decisions.

Perhaps the most important lesson from the Auditor-General's report is that planning decisions must not only be lawful, they must also be seen to be fair, evidence-based and transparent. These findings go directly to the issues raised by DPA-14.

The ACT Government has failed to properly consider alternative sites - Genuine options analysis is needed

The ACT Auditor-General was critical of the absence of a rigorous options analysis supporting the Phillip Pool changes. The same concern applies to DPA-14. The DPA-14 consultation documents do not provide confidence that all reasonable alternative locations have been assessed through an objective, transparent and evidence-based process.

The community has not been shown a transparent and independently documented assessment of alternative sites for a permanent northern green waste facility. Without that analysis, the community cannot know whether Block 1653 is truly the best available location or simply the most convenient one for the proposal already being advanced.

Given the regional significance of this facility and its long-term impacts on surrounding communities, the Government should be required to undertake a fresh, independent site selection process that:

- identifies all realistic options for a permanent north Canberra green waste facility;
- assesses each site against consistent environmental, social, economic and operational criteria;
- includes meaningful community consultation before a preferred site is selected; and
- publicly releases the evidence supporting the final recommendation.

A proper options analysis for DPA-14 should also compare, at a minimum:

- environmental impacts;
- bushfire risk;
- traffic and transport efficiency;
- odour and air quality impacts;
- compatibility with surrounding land uses;
- effects on nearby residential communities; and
- implications for future urban growth.

Without this evidence, it is impossible to have confidence that Block 1653 represents the best available location with minimal community and environmental impacts, and that the planning amendment is based on planning merit rather than on a predetermined outcome.

Community needs should be identified before a site is chosen and permanent, major planning changes are made

One of the most disappointing aspects of this process has been the erosion of community trust. Many residents feel that decisions have been made by Government prior to analysis of community needs or impacts, and that consultation has become a process of justifying a predetermined outcome rather than genuinely considering community views.

Planning decisions of this significance require transparency, openness and genuine engagement. That standard has not been met.

In Report No. 7/2026, the ACT Auditor-General concluded that planning decisions should be based on a clear understanding of community needs, rather than retrospectively justifying a preferred outcome.

That principle is highly relevant to DPA-14. In my view, the ACT Government has not demonstrated that it first identified the waste management needs of West Belconnen and the broader Canberra community before deciding that Block 1653 should be rezoned for a permanent green waste recycling facility.

Instead, the amendment appears to be designed to enable an existing proposal, rather than to determine through an open and objective process what location best meets operational needs while also protecting surrounding communities.

For DPA-14, the proper sequence should be:

1. identify the actual need for a permanent northern green waste facility;
2. assess whether that need can be met in other ways; and
3. compare all feasible sites before selecting a preferred location.

Inconsistency with the Planning Act 2023 and the Territory Plan Planning Principles

The *Planning Act 2023* establishes a planning system intended to promote good planning outcomes that serve the long-term public interest. The zoning rules are established to support these outcomes. Block 1653 was registered in 2023 as a carve out of the broader NUZ1 Broadacre Block 1582. DPA-14 and the intended green waste development that would follow are fundamentally inconsistent with the following NUZ1 zone objectives:

- b) Make provision for activities requiring clearance zones or protection from conflicting development.
- c) Ensure that development does not adversely impact or visually intrude on the landscape and environmental quality of the locality.
- d) Ensure, where appropriate, that development and the use of land does not

undermine the future use of land which may be required for urban and other purposes.

The Planning Act emphasises that planning decisions should integrate environmental, social and economic considerations and should contribute to ecologically sustainable development. In my view, DPA-14 is inconsistent with these objectives.

Rather than demonstrating how the proposal achieves an integrated planning outcome, the amendment appears to focus primarily on facilitating a particular land use on a particular site. This is a fundamentally different exercise from determining whether the proposal represents the best planning outcome for Canberra as a whole.

The Planning Act also establishes a framework that encourages evidence-based decision-making, transparency and genuine community participation. Those principles require decision-makers to carefully consider not only operational benefits, but also the impacts on surrounding communities, environmental values and future generations.

As a resident of Strathnairn, I do not believe the consultation material demonstrates that these competing considerations have been appropriately balanced.

Protecting residential amenity

The Territory Plan is intended to guide development that protects environmental values while creating healthy, liveable and resilient communities, and recognises the importance of protecting residential areas from incompatible land uses. The proposed amendment is inconsistent with several key planning principles.

A permanent green waste facility is an industrial activity with the potential to generate odour, dust, smoke, noise, heavy vehicle traffic and visual impacts. These impacts are fundamentally different from those expected within a residential community such as Strathnairn.

Changing the Territory Plan to facilitate this use immediately adjacent to a rapidly growing residential area weakens the very planning protections that residents reasonably expect when purchasing homes in a master-planned community.

DPA-14 would permanently change the planning framework for land immediately adjacent to a growing residential area. If the community is not given a clear explanation of why Block 1653 was selected, what alternatives were considered, and how key risks were assessed, public confidence in the process will continue to erode.

Once the Territory Plan is amended and the use becomes established, the consequences for nearby residents will be long-lasting and difficult to reverse. Concerningly, the proposed amendment to include “recycling” as an approved use of Block 1653 is much broader than green waste drop-off and processing, and there is a high risk of unintended consequences unfolding on this block in future, if DPA-14 is approved.

Compatibility of surrounding land uses

Good planning seeks to separate incompatible land uses wherever practicable. Rather than creating an appropriate transition between industrial activities and residential neighbourhoods, DPA-14 permanently embeds a regional industrial use beside existing and future homes.

Once this planning framework is established, future governments may find it increasingly difficult to resist further industrial expansion or intensification on

adjoining land. The draft Masterplan for the West Belconnen Urban Support Precinct, if realised, would further exacerbate successive failed planning decisions.

Inconsistency with the ACT Planning Strategy

The ACT Planning Strategy promotes compact urban growth, integrated land use planning and the protection of environmental values. The Strategy also recognises that planning decisions should:

- support healthy communities;
- protect biodiversity;
- respond to climate change;
- integrate transport and land use planning;
- carefully consider cumulative impacts; and
- provide transparent strategic justification for major planning decisions.

I am not persuaded that DPA-14 satisfies these strategic directions. The proposed green waste facility would place additional industrial traffic onto an already constrained road network serving rapidly growing suburbs, and introduce long-term environmental and amenity risks into an area intended to become home to thousands more residents.

Most importantly, it has not been supported by a transparent strategic assessment demonstrating why this location is preferable to other alternatives.

Inconsistency with the ACT Climate Change Strategy

The ACT Government has committed to building climate-resilient communities and ensuring that planning decisions strengthen resilience to climate change. Climate resilience is not simply about reducing emissions. It also requires planning decisions that minimise exposure to increasing risks associated with hotter temperatures, longer fire seasons and more extreme weather.

Green waste stockpiles are particularly vulnerable during periods of extreme heat. As climate change increases the frequency and severity of hot weather, the potential risks associated with fire, smoke and emergency response become increasingly important planning considerations.

The proposal therefore raises questions about whether locating a permanent green waste recycling facility adjacent to expanding residential communities represents a climate-resilient planning outcome. The Government should be applying climate adaptation principles by reducing avoidable risks rather than introducing new ones.

Environmental Values of the Western Edge Investigation Area

The proposed amendment also needs to be considered within the broader context of the Western Edge Investigation Area. The ACT Government has previously acknowledged that the Western Edge contains significant environmental values requiring extensive investigation before future land use decisions are made. Those investigations identified the need for further assessment of biodiversity, hydrology, bushfire risk, cultural heritage and landscape values before major planning decisions are taken.

Despite this, DPA-14 proposes to facilitate additional industrial land uses within this broader landscape before the Government has completed its strategic work for the Western Edge. This appears inconsistent with a precautionary and integrated planning approach.

Concerns raised by the ACT Conservation Council

The ACT Conservation Council has recently highlighted significant concerns regarding the future of Canberra's Western Edge. The Council argues that this landscape performs important ecological functions by supporting endangered ecological communities, threatened species habitat, landscape connectivity, climate resilience and natural buffers against bushfire, flooding and extreme heat. It has also emphasised the cultural, agricultural and recreational importance of the area and called for stronger protection through a clearly defined urban growth boundary.

While DPA-14 concerns a specific planning amendment rather than broad urban expansion, it cannot be considered in isolation. Approving additional industrial uses within this landscape risks incrementally eroding the environmental values that the Government itself is still investigating and that conservation organisations have identified as regionally significant.

Planning decisions should recognise cumulative impacts. Each individual amendment may appear relatively modest, but together they can progressively fragment landscapes, reduce ecological resilience and diminish the environmental qualities that make Canberra unique.

The Need for Strategic, Not Incremental, Planning

One of my greatest concerns is that DPA-14 represents another example of incremental planning lacking strategic foresight. The ACT Government has reversed the logical planning sequence in this instance. Rather than first completing strategic investigations, determining long-term land use objectives and identifying the most suitable location for regional waste infrastructure, the ACT Government is proposing to amend the Territory Plan to facilitate a specific proposal.

Strategic planning should establish the vision first. Site selection should follow.

Statutory planning amendments should only occur once there is compelling evidence that the chosen site best achieves environmental, social and economic outcomes. That sequence reflects the principles identified by the ACT Auditor-General in relation to the Phillip Pool planning process and would significantly improve public confidence in DPA-14. Until that occurs, I remain firmly opposed to this amendment.

Conclusion

For the reasons outlined above, I strongly object to Draft Major Plan Amendment 14. The ACT Government should:

- abandon DPA-14;
- cease progressing the relocation of the green waste facility to Block 1653; undertake a new, transparent and evidence-based regional needs
- assessment for north Canberra green waste services;
- commission a fresh feasibility study examining all realistic alternative
- locations; and
- prioritise investment in the infrastructure, shops, services and community facilities that residents of Ginninderry urgently need.

The people of Strathnairn, Macnamara, Holt and the surrounding area deserve planning decisions that protect our health, safety, environment and quality of life, not decisions that place a permanent waste facility, and open the door to future unknown waste management facilities, on the doorstep of

one of a fast growing community.



**CONSERVATION
COUNCIL** ACT REGION

Submission to Territory Planning Authority

Draft Plan Amendment 14 – Belconnen green waste recycling facility and bulk landscape supplies

20 July 2026

The Conservation Council ACT Region (Council) is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

For further information please contact:

[Redacted contact information]

[Redacted contact information]

Introduction

The Council appreciates the opportunity to comment on Draft Plan Amendment 14 – Belconnen green waste recycling facility and bulk landscape supplies (DPA-14). We note the leaseholders of Block 1634 are supportive of the Council's submission.

In DPA-14, the Territory Planning Authority (TPA) proposes to amend the 'Land Use Table' within the *Belconnen District Policy* to include 'recycling facility' and 'bulk landscape supplies' as forms of 'assessable development' that may, on subsequent approval, be allowed within Block 1653 – a 5.08 hectare (ha) rural block in southwest Belconnen. Block 1653 lies within Central Molonglo, in the Western Edge Investigation Area (WEIA). Its location is shown at Figures 1-4 in Attachment A.

The Council recognises that Block 1653 itself is a degraded former vineyard of low ecological value. We also recognise there is a significant need for a new green waste recycling facility in North Canberra and are supportive of the recycling, mulching and composting services a new green waste facility will provide.

However, our concern is that DPA-14 and its supporting documents fail to acknowledge the broader spatial and ecological context of the surrounding area, which includes sensitive ecological communities and the Molonglo River downstream of the site. The ecological advice relied on for DPA-14 contains no assessment against the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), despite several potential matters of national environmental significance in the immediate vicinity.

The Council remains deeply concerned that the ACT Government is pushing forward with permanent industrial infrastructure development in the WEIA, when it has also stated 'there has been no Government decision made as to whether any development will proceed in the WEIA,'¹ and is yet to develop a landscape plan for the ACT.

We are concerned about the cumulative impact of what could follow — multiple incremental development proposals in the Western Edge, in which DPA-14, as the first, 'opens up' the Central Molonglo area. This is not effective landscape planning, disregarding what exists and is at risk beyond Block 1653. This is an area where farmers make a living, and is a haven for our critically endangered Box-Gum Grassy Woodland and iconic wildlife.

The proposed amendment puts at risk:

- rural livelihoods, as there is leasehold land dedicated to productive rural enterprise in Central Molonglo
- the natural environment – including surrounding Box-Gum Woodland that surrounds Block 1653, and the Molonglo River
- the open space values outlined in the National Capital Open Space System (NCOSS), which are of increasing importance to the residents of Belconnen and Molonglo as these adjacent areas continue to expand.²

¹ ACT Government (online) *Western edge investigation*, www.planning.act.gov.au/planning-projects/western-edge-investigation, viewed 17 July 2026

² Seddon, G. (1977) *An open space system for Canberra*, Technical Paper No. 23, a policy review prepared for the National Capital Development Commission, www.nca.gov.au/sites/default/files/publication-documents/George%20Seddon%27s%20An%20Open%20Space%20System%20for%20Canberra%20technical%20paper%2023-%201977.pdf, pp. 32-33

Recommendations

The Council makes the following recommendations:

Recommendation 1 – That DPA-14 be refused and other alternative sites be considered.

DPA-14 should be refused while WEIA investigations are ongoing and a landscape plan is being developed for the ACT. DPA-14 is inconsistent with the ACT Government's own commitments, relies on inadequate assessment, and proposes a land use that is unsuited to the site.

The ACT Government should seek an alternative site location for the green waste facility. Our reasons are summarised below and set out in detail in this submission.

Recommendation 2 – If DPA-14 is not refused, that it be referred to the Standing Committee on Environment and Planning for inquiry before any further step is taken.

The terms of reference should examine:

1. whether the land use proposed in DPA-14 for Block 1653 is consistent with the ACT Government's decision to remove Central Molonglo 'in perpetuity' from consideration as a future urban area; and with its identification in the *Belconnen District Strategy* (2023) as part of the city's blue-green network.
2. whether the proposed use of Block 1653 is a 'split referral' likely to frustrate the objects of the EPBC Act.³

The committee's report should be completed and published before any further step is taken.

Recommendation 3 – That the TPA seek the advice on which the National Capital Authority (NCA) has relied, sufficient to demonstrate DPA-14 is consistent with the *National Capital Plan*.

The TPA should also confirm the precise *National Capital Plan* land classification of Block 1653 and adjacent blocks in Central Molonglo.

Recommendation 4 – That in preparing, publishing and inviting comments on its proposals, the TPA have regard to the audience.

In line with the principles of good consultation,⁴ information presented should be meaningful, transparent and understandable. This proposal falls short on all three.

The detail in this submission covers points of concern about the proposal, including insufficient context and process. To inform this submission, we have included maps in Attachment A.

³ *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), www.legislation.gov.au/C2004A00485/latest/text; (2013) *EPBC Act Policy Statement Staged Developments—Split referrals: Section 74A of the EPBC Act*, www.dcceew.gov.au/sites/default/files/documents/epbc-act-policy-staged-developments.pdf

⁴ *Planning Act 2023* (ACT), s 11

Summary

We submit that DPA-14 should be refused, or at the very least deferred until WEIA investigations are complete, for the following reasons:

1. The proposal is inconsistent with the ACT Government's commitment to not make any decisions about development in the Western Edge until investigations are completed.
 - a. The proposal is inconsistent with the Government's additional commitment to not undertake any urban development in Central Molonglo. The proposal anticipates a form of land use normally confined to urban industrial areas, in a landscape protected by the NCOSS.
 - b. The absence of context denies the public and the National Environment Protection Agency any awareness, let alone any understanding, of what development proposed in Central Molonglo in the short to medium term. The approach will thereby frustrate the objects of the EPBC Act by ignoring the cumulative impact of what is likely to follow, i.e., multiple one-off proposals where the first 'opens up' an area with a road.
2. DPA-14's ecological advice notes "areas of remnant vegetation" exist in the vicinity of Block 1653⁵; what is *not* mentioned is Block 1653 is almost completely surrounded – to an extent of around 300 degrees – by 'sensitive ecological communities'⁶ in the form of 'potential threatened woodland'.⁷ That threatened woodland is likely to be the ecological community 'White Box–Yellow Box–Blakely's Red Gum Grassy Woodland and Derived Native Grassland' which is listed as threatened, under the EPBC Act, at the level of Critically Endangered (Box-Gum Woodland). Those values have not been surveyed nor assessed against the National Capital Plan or under the EPBC Act.
3. Block 1653 is steep and would require significant earthworks⁸, increasing the risk of erosion and sediment run-off into the Molonglo River. A permanent facility generating leachate, dust and weed propagules in this location engages the general environmental duty under the *Environment Protection Act 1997* (ACT)⁹ and the water-quality objectives of the Murray-Darling Basin.
4. The evidence base in attachments to DPA-14 assesses the wrong land and the wrong period. The *Ecological Advice*¹⁰, the *Aboriginal Cultural Heritage Assessment*¹¹ and the

⁵ Territory Planning Authority (TPA) (2026) *Supporting Report* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0003/3078660/Supporting-Report.pdf, p. 6

⁶ ACT Government (2023) *Belconnen District Strategy*, www.planning.act.gov.au/__data/assets/pdf_file/0010/2324683/district-strategies-2023-volume-2-district-strategies-belconnen.pdf, Figure 8 on p. 15

⁷ ACTmapi (online) *ACT Potential Threatened Woodland*, https://services1.arcgis.com/E5n4f1VY84i0xSjy/arcgis/rest/services/ACTGOV_Woodland_Threatened/FeatureServer

⁸ Cardno (2022) *Feasibility Study – Mitchell RMC and Identification of Future Waste Sites in North Canberra: Design Options Study* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0011/3079937/5a93ff846e799fc184cc9b804f8044bb1063f48d.pdf, p. 25

⁹ *Environment Protection Act 1997*, www.legislation.act.gov.au/View/a/1997-92/current/html/1997-92.html

¹⁰ Capital Ecology (2021) *Ecological Advice* attached to DPA-14, report to Ginninderry titled "The Vines" (Block 1582), Belconnen, www.planning.act.gov.au/__data/assets/pdf_file/0012/3079938/85b7b26b55bff114d80375066ea52c5cfa66e0ea.pdf

¹¹ Past Traces (2021) *Aboriginal Cultural Heritage Assessment* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0004/3079939/22f0c640469f427f07063b2f132b8db9dd5d5ac4.pdf

National Capital Authority's agreement¹² all describe all or part of Block 1582. The block proposed for rezoning, Block 1653, does not appear in any of these documents. The *Traffic Assessment* was for a proposal for a temporary, i.e., not a permanent, development.¹³

5. The amendment may have no legal effect. Under s 26 of the *Australian Capital Territory (Planning and Land Management) Act 1988* (Cth) (PALM Act), the Territory Plan has no effect to the extent it is inconsistent with the *National Capital Plan*.¹⁴ A permanent recycling and bulk-landscape-supplies operation are not permitted uses in the *National Capital Plan*'s broadacre and open-space categories.¹⁵
6. The proposal is to make permanent a temporary use that was initially refused. The TPA refused the original development application for multiple reasons. Among these reasons, the use proposed was:
 - a. "inconsistent with a Temporary use" – site hardening, for example, would have had irreversible impacts¹⁶
 - b. "not considered suitable for the land"¹⁷
 - c. a recycling facility – "facilities of this nature are prohibited within the NUZ1 zone."¹⁸

DPA-14 seeks to remove that obstacle by rewriting the *Belconnen District Policy*.

7. The processes involved are flawed: consistency with the ACT Planning Strategy is asserted but not demonstrated; future pollution and heritage approvals are pre-judged; and the NCA's agreement was obtained without community consultation.

¹² National Capital Authority (NCA) (13 Feb 2026) *Response letter to the Suburban Land Authority* attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0010/3079936/6857e689a045980dc0836dda6831e2ec78179949.pdf

¹³ Calibre Professional Services (2022) *Report: Canberra Sand and Gravel–Traffic Impact Assessment*, Report prepared for Riverview Projects, www.planning.act.gov.au/__data/assets/pdf_file/0006/3079941/8853855e9a064be2c20e80e5554b38ed06bfd7a1.pdf

¹⁴ *Australian Capital Territory (Planning and Land Management) Act 1988* (PALM Act), www.legislation.gov.au/C2004A03701/latest/text

¹⁵ NCA n 12 (*Response letter to the SLA*)

¹⁶ *Notice of Decision to Refuse DA202240118* (1 September 2022), <https://dafinder.blob.core.windows.net/dadocuments/DOCs/NOTICEOFDECISION-202240118-SIGNED.pdf>, p. 2; see also *Notice of Decision on Reconsideration for DA202240118* (3 August 2023), unpublished, p. 2

¹⁷ *Notice of Decision to Refuse DA202240118 n 16*, p. 3; see also *Notice of Decision on Reconsideration for DA202240118 n 16*, p. 4

¹⁸ *Notice of Decision to Refuse DA202240118 n 16*, p. 3

Detailed Views

Inconsistency with ACT Government commitments: the WEIA and Central Molonglo

There is an omission of contextual information in DPA-14 and its attachments about the broader context of Block 1653. At increasing scales, DPA-14 provides no information about:

- blocks in the immediate vicinity of the Broadacre land in Central Molonglo, i.e., about the values of blocks adjacent to blocks 1653 and 1582
- Central Molonglo
- the Western Edge Investigation Area.

The *ACT Planning Strategy* states the ACT Government will investigate urban development options in the Western Edge Investigation Area “excluding Central Molonglo”¹⁹, i.e., the *ACT Planning Strategy* does not include for Central Molonglo this form of development which is ordinarily confined to urban-industrial settings.

The Council does not consider it acceptable for this proposal to proceed contrary to the *ACT Planning Strategy*. Despite the Government’s intentions to develop a landscape plan for the ACT, we remain concerned that the ACT community is going to find out that development that is planned in the Western Edge one planning amendment or proposal at a time.

Central Molonglo

Block 1653 (5.08 ha) lies within ‘Central Molonglo’ ([Figure 3](#)). Central Molonglo covers around 1164 ha. The *Supporting Report* mentions the surrounding area’s environmental values, however, the explanation is cursory at best:

*The District Strategy identifies the area surrounding the site as ecologically significant to be retained to protect environmental and heritage values, as well as broader landscape character.*²⁰

The *Belconnen District Policy* includes an outcome “Protect and enhance woodland values between Aranda Bushland and Woodstock nature reserves.”²¹ The woodland between these terrestrial protected areas is shown in [Figure 4](#). Block 1653 is located within the yellow oval shape. The areas of woodland that are protected are shaded green. Block 1653 lies amidst woodland that is not a protected area.

The ACT Government has previously committed to remove Central Molonglo *in perpetuity* from consideration as a future urban area:

- Prior to September 2007, Block 1582 was zoned ‘Hills, Ridges and Buffers’ ([Figure 5](#)). When public comment was invited on Draft Variation 281 to the Territory Plan, and with interim effect from 28 April 2008, the then ACT Planning and Land Authority (ACTPLA, now the TPA) proposed changing: Block 1582 to Broadacre Area, which occurred on 9 Oct 2008; and much of the rest of Central Molonglo to ‘Residential’, which did not eventually occur ([Figure 6](#)).

¹⁹ ACT Government (2018) *ACT Planning Strategy*, www.act.gov.au/__data/assets/pdf_file/0003/2346276/2018-act-planning-strategy.pdf, section 1.2.1 on p. 45, underline added

²⁰ TPA n 5 (Supporting Report), p. 11

²¹ ACT Government (1 July 2026) *Belconnen District Policy* (NI2023-540), www.legislation.act.gov.au/DownloadFile/ni/2023-540/copy/182874/PDF/2023-540.PDF, ‘Desired Policy Outcome’ number 1 on p. 5

- On 18 August 2008, the former Planning Minister (who is now the Chief Minister):
 - approved Variation 281 to the Territory Plan under s 76(3) of the *Planning and Development Act 2007* (ACT) (Variation 281)²²
 - tabled a report by the Standing Committee for Planning and Environment in support of Variation 281, and in doing so noted in the Tabling Statement that the “Committee’s fourth recommendation is that Central Molonglo be removed in perpetuity from being considered as a future urban area”²³
 - directed the ACTPLA to “Vary the ... Territory Plan map to remove Central Molonglo in perpetuity from being considered as a future urban area.”²⁴
- Just prior to those decisions, the NCA had based *its* decision to oppose urban development in Central Molonglo on an independent environmental review report prepared by NGH Environmental, funded jointly by the NCA and the TPA.²⁵ It is understood this report recommended woodland within Central Molonglo be preserved to provide for the retention of vegetation and ecological communities in the more sensitive localities.²⁶
- In a report on its investigations and consultation with stakeholders concerning Draft Amendment 63 to the *National Capital Plan*, the NCA wrote:
 - *On 29 May 2008 the [NCA] considered the removal of central Molonglo from Urban Areas. The [NCA] agreed to the removal of central Molonglo on the basis of the [NGH Environmental] report. This position was reaffirmed on 8 July 2008. The independent environmental review ... will be available on the NCA website.*²⁷
- The report is not (or is no longer) available on the NCA website.

SLA Development Intentions in Central Molonglo

In December 2025, the SLA advised the Council it had invited consultants to tender for a “planning and engineering consultancy to prepare Subdivision Development Applications” for blocks 1582 and 1600 Belconnen.²⁸ The advice noted “development is intended to accommodate a mixture of commercial premises and community services, not residential development.”²⁹ Soon after, a tender document appeared on a Facebook page showing

²² *Planning and Development Act 2007* (repealed),

www.legislation.act.gov.au/View/a/2007-24/20231127-82545/html/2007-24.html; *Planning and Development (Plan Variation No 281) Notice 2008*, NI2008–352, www.legislation.act.gov.au/ni/2008-352/

²³ Legislative Assembly (19 Aug 2008) *Tabling Statement: Variation No. 281 to the Territory Plan: Molonglo and North Weston*, www.parliament.act.gov.au/_data/assets/pdf_file/0006/380607/6th_PE_36_DV281.pdf, p. 5

²⁴ *Planning and Development (Plan Variation No 281) Direction 2008 Molonglo and North Weston* (NI2008 351), www.legislation.act.gov.au/View/ni/2008-351/20080822-37459/PDF/2008-351.PDF, point 3 in Annexe A

²⁵ NCA (2008) *Report on Consultation National Capital Plan Draft Amendment 63 – Molonglo & North Weston*, www.nca.gov.au/sites/default/files/amendments/Draft%20Amendment63_Report_on_Consultation_May2008.pdf, p. 16; Note: This report abbreviates the NCA to the ‘NCA’ (p. 3), and what is now the TPA to ‘ACTPLA’ (p. 4). In the quote that is included under this sub-heading, the word replaced inside the brackets is ‘Authority’. It is assumed here that the ‘Authority’ referred to is the NCA. This is based on other references to ‘the Authority’ throughout the NCA’s report on its consultation, e.g., “Special Requirements of the [National Capital] Plan currently apply to the Molonglo River Corridor, and development within the Molonglo River Corridor is to be in accordance with a Development Control Plan (DCP) agreed by the Authority” (p. 13), underline added.

²⁶ NCA n 25 (Report on Consultation over Draft National Capital Plan Amendment 63), p. 17

²⁷ *Ibid*, underline added

²⁸ Email from the SLA to the Council dated 10 December 2025, unpublished.

²⁹ *Ibid*.

preliminary plans for community services include a school, church and retirement living area (Figure 7).³⁰ By 22 January 2026, the plan may have changed. On this date, the SLA wrote to the NCA explaining its proposed use of Block 1582 was as a green waste facility.

Attaching the Cardno *Design Options Study* comprising a feasibility study of resource management centre options ‘begs a question’ that, unhelpfully, the TPA’s DPA-14 paperwork does not answer. The TPA does not state what option the TPA is pursuing for blocks 1582 or 1600. The Cardno *Design Options Study* includes the option to co-locate and operate a resource management centre like the Mugga Lane Resource Management Centre in Symonston on block 1634 which is not Broadacre land but ‘Hills, Ridges and Buffers’.

Inconsistency with the *National Capital Plan*

Section 26 of the PALM Act provides that “the Territory Plan has no effect to the extent that it is inconsistent with the *National Capital Plan*”. This is a Commonwealth over-ride that no Territory process can cure.

The permitted uses in the *National Capital Plan*’s non-urban categories — the NCOSS and Broadacre — are limited to purposes such as agriculture, forestry, nature conservation, recreation, parks, public utilities and, at most, retail plant nurseries. Waste facilities, recycling and industrial uses do not appear on those permitted-use lists. In the *National Capital Plan*, industry is confined to designated estates *within urban areas*. We submit that a permanent commercial recycling and bulk-landscape-supplies facility on non-urban land is inconsistent with the *National Capital Plan*.

We understand the NCA’s letter records agreement to a use of Block 1582; however, we note the letter merely recites the “not inconsistent” test without giving reasons. If enabling this use in fact requires an amendment to the *National Capital Plan* itself — as occurred for Central Molonglo through Amendment 63 in 2008 — that is a matter for the NCA’s formal amendment process, including tabling for disallowance in the Australian Parliament.

We recommend that the TPA seek the legal advice on which the NCA relied, sufficient to demonstrate DPA-14 is consistent with the *National Capital Plan*, and to confirm the precise *National Capital Plan* land classification of Block 1653.

Inconsistency with the NCOSS (National Capital Open Space System)

The NCOSS, safeguarded by the NCA, recognises the “importance of the natural setting”³¹, which includes space that “separates individual towns yet binds the whole together into the city of Canberra.”³² The NCA explains, “closely associated with the NCOSS are the Territory’s rural lands which also contribute significantly to the landscape setting.”³³

The Council met with officials from the NCA in July 2026 and asked if the NCA had any intention to more-precisely define the NCOSS between the suburbs of Whitlam (in Molonglo) and

³⁰ Belconnen Community Council (3 Mar 26) *Post*, www.facebook.com/belcouncil/posts/pfbid02tahL1k9ydmazwmXmUKdkkhJx1aZMnDmdP7ndioaSgBteZkpL3DStH7ngRkbhYI, viewed 1 May 2026 and 12 July 2026

³¹ NCA (2021) *National Capital Plan*, www.nca.gov.au/sites/default/files/National%20Capital%20Plan_rev%20April%202021.pdf, p. 24

³² NCA n 31 (publication titled *National Capital Plan*), p. 12

³³ NCA n 31 (publication titled *National Capital Plan*), p. 24

Strathnairn (in Belconnen). As the city expands, and if Central Molonglo is developed, Molonglo and Belconnen will 'get closer together' on a much wider front adjacent to the lower Molonglo River.

Recalling from above, the TPA was *directed* to rule out urban development in Central Molonglo *in perpetuity*, after concerns were raised by the NCA. Against that history, it is not appropriate that the ACT Government is now proposing urban development that will open up Central Molonglo *without* explaining the context, nor that the NCA has given an agreement *without* public consultation and *without* due consideration of the implications for the NCOSS.

A green waste facility on Block 1653 is likely to be part of a larger action

The *Belconnen District Policy* states there is a need for a green waste facility in the district.³⁴ DPA-14 proposes that a green waste facility be allowed on Block 1653 *in a planning sense only*. That is:

- If DPA-14 is approved, a green waste facility will be a form of development assessable and allowable (i.e., approvable) under laws applicable in the ACT.
- Subsequent approvals would be required relating to matters including (but not limited to) controlling pollution to maintain water quality and protecting environmental and cultural heritage.
- To inform the public at this early stage, the TPA has provided ecological, cultural heritage and other assessments of Block 1582.³⁵
- The TPA has also provided a feasibility study, prepared by Cardno in 2022, that includes a detailed analysis of sites "from a functional perspective [having] sought to identify opportunities and constraints for development of a Resource Management Facility" in north Canberra.³⁶

While Block 1653 is modest in size at 5.08 ha, DPA-14 would make a temporary use permanent. By virtue of a road necessary to access that 5.08 ha site, it will also 'open up' access to the middle of Central Molonglo. That is, if approved, access to the green waste facility will enable co-location and diversification of the rest of the Broadacre Area and beyond into a resource management facility capable of serving the whole of Canberra's north side once the Mitchell facility closes.

Comparable green waste facilities in the ACT are far larger. The Parkwood Road facility is estimated at 7 ha and Mugga Lane at 9 ha.

What the area would be, in hectares, were an entire resource management facility co-located and operated at this Central Molonglo location is another matter entirely.

This initial action should not proceed if the larger proposed action is unacceptable

Block 1653 was formerly part of Block 1582. This fact is mentioned on p. 9 of DPA-14's *Supporting Report*.

The ecological and cultural heritage assessments were prepared for the larger parent Block 1582, not for Block 1653. They record that vegetation removal and deep ripping for

³⁴ ACT Government n 6 (Belconnen District Strategy), p. 57

³⁵ Footnotes 10-11, 47

³⁶ Cardno n 8 (*Design Options Study*), pp. iv, 22, underline added

irrigation severely disturbed parts of Block 1582.³⁷ We accept, working off satellite imagery, that Block 1653 is severely degraded and contains no remnant vegetation. The ecological report also records, however, that the wider Block 1582 site retains mature remnant Blakely's Red Gum, *Eucalyptus blakelyi*, and Apple Box trees, *E. bridgesiana*.³⁸ The heritage assessment of Block 1582 records two Aboriginal artefact sites.³⁹ DPA-14 tells us little of what lies beyond.

Explanations of the surrounding areas environmental values are cursory

The *Supporting Report* mentions the surrounding area's environmental values, however, the explanation is cursory and makes presumptions:

*The District Strategy identifies the area surrounding the site as ecologically significant to be retained to protect environmental and heritage values, as well as broader landscape character. Operation of the facility will be appropriately managed in-line with the Environment Protection Act to ensure surrounding ecological values are protected.*⁴⁰

That reads as though the outcome of subsequent processes necessary to determine if a green waste facility will be acceptable and could be approved have already been determined.

To be sure, The *Belconnen District Strategy* makes clear Block 1653 is almost completely surrounded – to an extent of around 300 degrees – by 'sensitive ecological communities'⁴¹ (Figure 8). The 'potential threatened woodland'⁴² around Block 1653 is likely to be Box-Gum Woodland.

Inadequate assessment

The *Supporting Report* indicates the Belconnen District and Non-Urban Zones policies are relevant. The *Supporting Report* states:

*Recycling facility and bulk landscape supplies are not permitted uses in the non-urban zones (NUZ1-5). However ... , the district policies override the zones policies to the extent of the inconsistency.*⁴³

That is the extent of the explanation provided before the conclusion:

*The relative impacts of the proposed changes were assessed, and the proposal is considered to be consistent with the Planning Strategy and Belconnen District Strategy.*⁴⁴

All other statements explain the role and function of different aspects of the legal, regulatory, planning and administrative environments.

In our view, this assessment is manifestly inadequate. For example, the assessment in DPA-14 does not engage with the following facts. Figure 8 in the *Belconnen District Strategy* (Figure 8) indicates:

- blocks 1653 and 1582 are part of the blue-green 'Urban ACT ecological network'

³⁷ Past Traces n 11 (Aboriginal Cultural Heritage Assessment), p. 5

³⁸ Capital Ecology n 10 (Ecological Advice), p. 1

³⁹ Past Traces n 11 (Aboriginal Cultural Heritage Assessment), p. 16

⁴⁰ TPA n 5 (*Supporting Report*), p. 11

⁴¹ ACT Government n 6 (*Belconnen District Strategy*), Figure 8 on p. 15

⁴² ACTmap n 7

⁴³ TPA n 5 (*Supporting Report*), p. 12

⁴⁴ TPA n 5 (*Supporting Report*), p. 15

- no development is planned in Central Molonglo before 2038, i.e., viewing Figure 8 on page 15 of the *Belconnen District Strategy*, which we understand is based on investigations planned as outlined in the strategy, change is not predicted to happen anywhere in Central Molonglo within 15 years of approval of the strategy in 2023⁴⁵

Nowhere is the importance of Central Molonglo's woodland as a source of connectivity acknowledged ([Figure 9](#)).

In view of the above, the *Supporting Report* is factually incorrect in stating the proposed changes are consistent with the *Belconnen District Strategy*. While we understand district strategies are not regulatory documents, we expect the ACT Government will transparently inform the public, in the district strategies, of future plan amendments under consideration. The proposal set out in DPA-14 is not indicated in the *Belconnen District Strategy* which states:

*The outcomes of the work undertaken through the district strategy initiatives will inform future Territory Plan amendments. These are statutory processes that involve supporting reports and necessary assessments to make available land that is 'planning ready' in a clear and coordinated way.*⁴⁶

The urgency embodied in the Suburban Land Agency's (SLA) letter to the NCA dated 22 January 2026⁴⁷ is the *antithesis* of effective, coordinated landscape planning, an admission of failure. In this case, the 'necessary assessment' is inadequate.

NCA decision (without consultation)

The *Supporting Report* notes "recycling facility and/or bulk landscape supply establishment are not generally permitted in the Broadacre Area"⁴⁸; yet, without consultation, the NCA Board has "agreed to the use of Block 1582 Belconnen for the purpose of a green waste facility and bulk landscape supplies."⁴⁹ The NCA Board 'satisfied itself' that the use of Block 1582 as a green waste recycling facility "is not inconsistent with relevant principles and policies of the" *National Capital Plan*.⁵⁰ However, the NCA did not explain how it concluded that this use is not inconsistent with the broad framework for land use in the Territory, as shown in Figure 2 'General Policy Plan' ([Figure 1](#)), which to the Council indicates the area is not to be developed for urban use.

We note the evidence presented to the NCA by the SLA⁵¹ states:

- "Block 1582 has been identified as the only viable site within Belconnen in the short term."
- the Cardno Design Options Study⁵² provides "comprehensive justification for the selection of Block 1582 as the preferred site for a green waste facility."

⁴⁵ ACT Government n 6 (*Belconnen District Strategy*), both Figure 8 on p. 15

⁴⁶ ACT Government n 21 (*Belconnen District Policy*), p. 16

⁴⁷ Suburban Land Authority (SLA) (22 January 2026) *Letter to NCA from SLA*, attached to DPA-14, www.planning.act.gov.au/__data/assets/pdf_file/0009/3079935/8f3e385492b0dd906e8674d7e6eb13e5d76732b1.pdf

⁴⁸ TPA n 5 (*Supporting Report*), p. 9

⁴⁹ NCA n 12 (*Response letter to the SLA*)

⁵⁰ *Ibid.*

⁵¹ SLA n 47 (*Letter to NCA from SLA*)

⁵² Cardno n 8 (*Design Options Study*)

We query how the NCA understood these propositions. Did the NCA understand Block 1653 is steep and will require significant earthworks⁵³ (Figure 10)? If as we suspect the facility will only be adequate for the short term, is that good planning? What did the neighbouring lease managers think about these propositions? It appears they are not happy.⁵⁴

Commonwealth environmental significance has not been assessed

The ecological advice relied on for DPA-14 contains no assessment against the EPBC Act, despite several potential matters of national environmental significance in the immediate vicinity:

- As noted above, the ecological advice records that mature remnant Blakely's Red Gum trees exist on Block 1582. This is a defining species in Box-Gum Woodland; occurrences of as small as 0.1 hectare are protected. The occurrence mapped on Block 1582 is contiguous with other mapped "Potential Threatened Woodland".⁵⁵
- The ecological advice acknowledges Block 1582 provides foraging habitat for the Superb Parrot, *Polytelis swainsonii* (listed Vulnerable under the EPBC Act), "and other significant woodland birds".⁵⁶
- The wider West Belconnen area has recorded the Golden Sun Moth, *Synemon plana* (Critically Endangered) and the Pink-tailed Worm-lizard, *Aprasia parapulchella* (Vulnerable), neither of which a single brief spring inspection could reliably have detected.
- Block 1653 lies in the vicinity of the Ginninderry Conservation Corridor, visible as Woodstock Nature Reserve in Figure 4, established as the legally binding biodiversity offset for Commonwealth-approved development in Ginninderry. A permanent source of leachate, dust, weed propagules and fire risk beside that corridor would tend to undermine a Commonwealth-sanctioned offset.

We submit that, before any amendment proceeds, the ACT Government make clear its broader intentions and conduct current and targeted surveys of that wider area. These surveys — conducted in the correct survey seasons — should be completed. Once completed, the ACT Government should consider its obligations to refer its entire Central Molonglo development vision to the Commonwealth Minister for the Environment for a decision on whether an assessment and approval is required under the EPBC Act.

⁵³ Cardno n 8 (Design Options Study), p. 25

⁵⁴ Bushnell, I. (18 June 2026) Woolgrower upset at bid to make West Belconnen green waste site permanent and much bigger, In *Region*, <https://region.com.au/woolgrower-upset-at-bid-to-make-west-belconnen-green-waste-site-permanent-and-much-bigger/975152/>; Lindell, J. (12 July 2026) Why this proposed planning change is sparking fierce farmer pushback, In *The Canberra Times*, www.canberratimes.com.au/story/9309064/landholders-worry-over-plan-to-build-green-waste-facility/; Canberra Public Interest (online) *DPA-14: Draft Planning Amendment 14*, <https://canberrapublicinterest.au/issues/dpa14/>, viewed 13 July 2026

⁵⁵ ACTmap n 7

⁵⁶ Capital Ecology n 10 (Ecological Advice), p. 2

A refused use – later approved on a temporary basis – is to be allowed, permanently

In 2023, the TPA granted the ACT Government a temporary-use approval for the permanent development it had earlier refused (DA202240118).⁵⁷

The key reasons for the TPA's initial refusal are outlined above; reiterating, among the reasons published, the TPA noted that the works constituted a recycling facility rather than a temporary use, that the proposal did not comply with the requirements for merit-track applications, and that "the authority is not satisfied that the subject land is suitable for the proposed development".⁵⁸ Transport Canberra and City Services and the Emergency Services Agency were unable to support it on traffic and bushfire grounds. It proceeded only on reconsideration, as a strictly time-limited trial.

DPA-14 now seeks to make this same use permanent. The neighbours and referral agencies accepted a capped three-year trial; permanence removes the safeguard on which that acceptance rested. The bushfire, emergency-services, traffic and remediation concerns that underpinned the refusal are unchanged; hence, in our view, the land remains unsuitable, and the appropriate response is to identify a better-located site.

Traffic, odour and water

The traffic assessment attached to DPA-14 is dated April 2022 and was prepared for the small temporary operation, modelling only Belconnen and Molonglo demand and drawing no distinction between temporary and permanent use. It cannot support a conclusion of "no adverse impact" for a permanent, whole-of-north-side facility, particularly as the adjoining West Belconnen residential precinct is built and heavy-vehicle movements increase along Stockdill Drive.

The ACT's own separation guideline keeps residential development at least one kilometre from a composting facility because of odour. The neighbouring farm buildings lie about 650 metres away — inside that zone — and a watercourse runs about 30 metres from the site before flowing to the Molonglo River Reserve and the Molonglo River. Block 1653 is also steep and would require significant earthworks, increasing the risk of erosion and sediment reaching that watercourse. A permanent facility generating leachate, dust and weed propagules in this location engages the general environmental duty under the *Environment Protection Act 1997* (ACT)⁵⁹ and the water-quality objectives of the Murray–Darling Basin. This use is, in our submission, fundamentally unsuited to the site.

⁵⁷ TPA (online) *Browse DAs*, record for DA202240118, www.planning.act.gov.au/applications-and-assessments/development-applications/browse-das/development-application-details?da-number=202240118&amendment-version=, viewed 17 July 2026

⁵⁸ *Notice of Decision to Refuse DA202240118* n 16; see also *Notice of Decision on Reconsideration of DA202240118* n 16, p. 4

⁵⁹ *Environment Protection Act 1997* (ACT), www.legislation.act.gov.au/View/a/1997-92/current/html/1997-92.html

First Nations peoples' cultural heritage

The heritage assessment (of Block 1582) records two Aboriginal artefact sites within the study area.⁶⁰ While the consultant rated them of low scientific significance, the Representative Aboriginal Organisations are recorded as considering that all sites should be respected, by avoidance or by mitigation, and that the return of artefacts to country is of the utmost importance.

The assessment's desktop finding that there is "no potential archaeological deposit"⁶¹ rests on what was conceded, i.e., low ground-surface visibility, and on a predictive model in which sites concentrate along drainage lines. We submit that sub-surface testing of Block 1653 is required before any disturbance, and that the four Representative Aboriginal Organisations should be consulted directly.

The *Belconnen District Strategy* does not require a new landfill facility

The TPA's *Supporting Report* states the:

Belconnen District Strategy identifies key short-term infrastructure upgrades required to support the needs of a growing city, including a green waste transfer facility and landfill habitation works in West Belconnen.⁶²

In our view, this could mislead. Reference to the need for 'infrastructure upgrades' in 'a growing city' alongside a confusing selection of words, i.e., 'landfill habitation works', may be taken by members of the public to suggest the *Belconnen District Strategy* calls for a new landfill facility. It does no such thing. We understand the *Belconnen District Strategy* is explaining that the Parkwood Road landfill facility must be rehabilitated.⁶³ Stating that an infrastructure upgrade is required in west Belconnen in the *Belconnen District Strategy* does not support its construction on land shown to be an ecologically sensitive part of the blue-green network.⁶⁴

Matters of process

As noted above, Block 1653 was formerly *part* Block 1582. This fact is mentioned on p. 9 of the *Supporting Report*. Noting DPA-14 is solely about land uses allowed on Block 1653, DPA-14 fails to explain up front in clear and simple terms why all attachments other than the Supporting Report refer only to Block 1582. To the audience we represent, this is confusing.

The Supporting Report explains DPA-14 proposes to amend the *Belconnen District Policy* to formalise and expand the blocks where the specified uses will be permitted.

- We had to read the SLA's letter to obtain a clear view of what is proposed, i.e., the "ACT Government is seeking ... to allow a *permanent* green waste facility and provision of landscaping supplies ...".⁶⁵

⁶⁰ Past Traces n 11 (*Aboriginal Cultural Heritage Assessment*), p. 16

⁶¹ Past Traces n 11 (*Aboriginal Cultural Heritage Assessment*), p. 17

⁶² TPA n 5 (*Supporting Report*), p. 11

⁶³ ACT Government n 6 (*Belconnen District Strategy*), p. 57

⁶⁴ ACT Government n 6 (*Belconnen District Strategy*), Fig 8 on p. 15

⁶⁵ SLA n 47 (*Letter to NCA from SLA*)

Direction 1.2 of the *ACT Planning Strategy* (2018) is to “investigate the potential for new residential areas to the west of the city to meet future housing need”⁶⁶, and Block 1653 lies within the Western Edge Investigation Area.⁶⁷ We know in 2008 a former Planning Minister ruled out ‘urban area’ development *in perpetuity* in Central Molonglo.⁶⁸

- It appears premature to be considering urban development, or development that should be in an urban area, in advance of finalising the Western Edge investigation.
- DPA-14 and its Supporting Report are presented as a proposal in a vacuum. Notably absent is any discussion of the context at Block 1653’s immediate, district and regional context.

Reference is made in DPA-14 to a temporary approval granted in August 2023 (DA202240118); however, records of DA202240118 available on the Browse DAs website⁶⁹ are poor:

- After a copy of the temporary-use approval decision granted in August 2023 was requested, it was provided by the TPA to a Council volunteer; however, as at 10 July 2026, the conditional approval of DA202240118 has not been published.
- There is no link provided to the written representations received during the public notification period.
- The original application in DA202240118 has been removed.

⁶⁶ ACT Government n 19 (*ACT Planning Strategy*), p. 44

⁶⁷ ACT Government n 19 (*ACT Planning Strategy*), Map 6 on p. 40

⁶⁸ *Planning and Development (Plan Variation No 281) Direction* n 31, point 3 in Annexe A

⁶⁹ TPA n 57

Attachment A: Maps and Figures

1. *National Capital Plan*'s map titled 'General Policy Plan & NCOSS – Metropolitan Canberra'
2. Location of blocks 1582 and 1653 in southwest Belconnen⁷⁰
3. Location of Broadacre Area (blocks 1582 and 1653) in 'Central Molonglo'
4. Situation of Block 1653 (yellow oval) in the local landscape – visible are the Western Edge Investigation Area and terrestrial protected areas in the vicinity
5. *Territory Plan* zoning as at Sep 2007⁷¹
6. *Territory Plan* zoning *proposed* in Draft Variation 281⁷²
7. Suburban Land Agency 'Concept Masterplan' for blocks 1582 & 1600 Belconnen
8. Belconnen District Strategy Plan, in the *Belconnen District Strategy*
9. Figure 4 with bird & mammal connectivity mapping added (Block 1653 in pink oval)
10. ACT Government's 'Survey map', focussed on Block 1653, showing topography

⁷⁰ TPA n 5 (Supporting Report) includes a similar map at Figure 2

⁷¹ ACTPLA (30 August 2007) *Draft Variation to the Territory Plan No. 281 Molonglo and North Weston*, <https://web.archive.org/web/20140309191846/http://apps.actpla.act.gov.au/tplan/variatio/dv281/dv281.pdf>, p. 21

⁷² ACTPLA n 71 (*Draft Variation to the Territory Plan No. 281*), p. 37

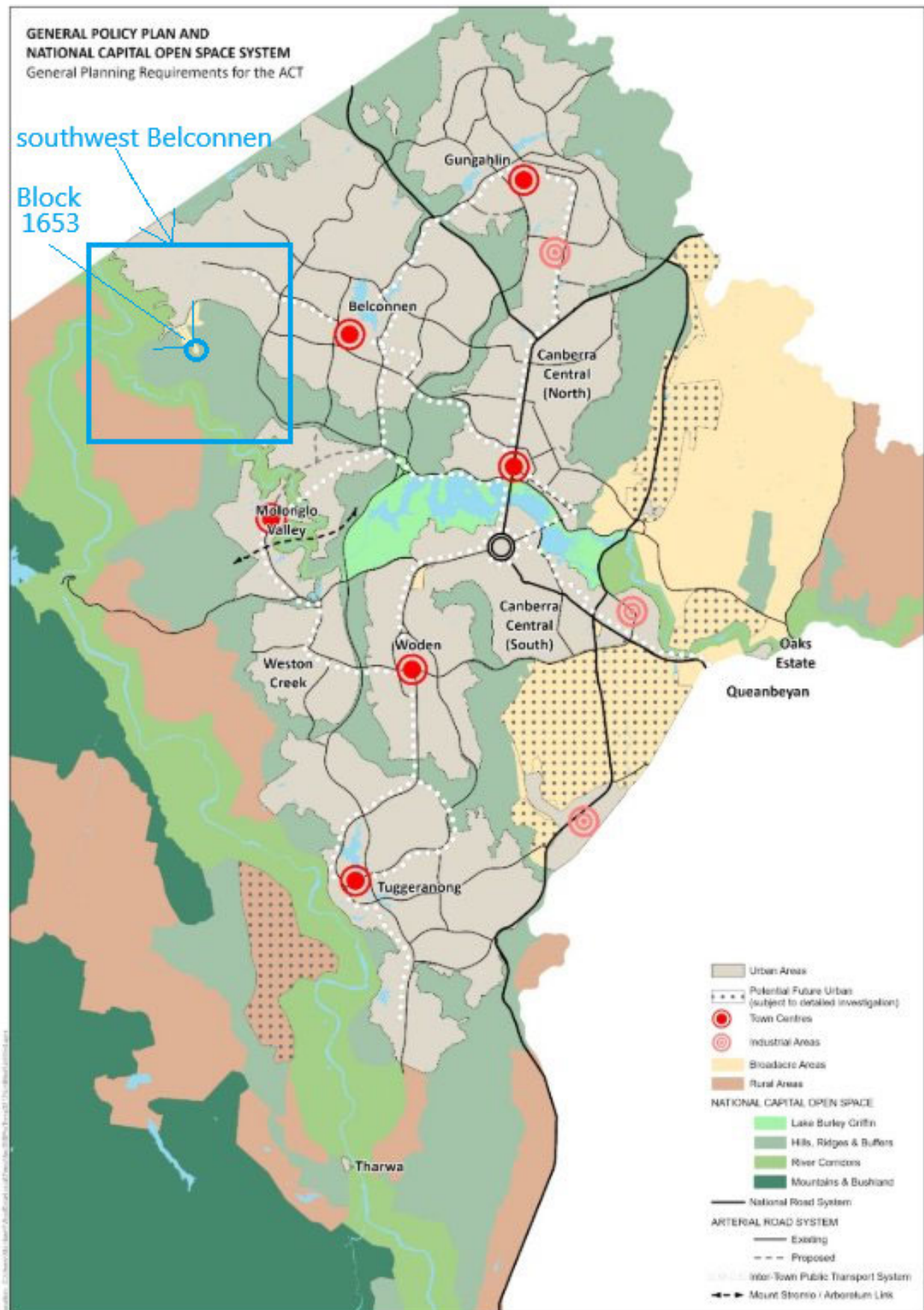


Figure 1: The *National Capital Plan*'s 'General Policy Plan & NCOS – Metropolitan Canberra'⁷³

⁷³ *National Capital Plan*, www.legislation.gov.au/F2007B00014/latest/text, vol 1, Figure 2



Figure 2: Location of Blocks 1582 and 1653 in southwest Belconnen⁷⁴

⁷⁴ 'ACTGOV BLOCK' data has been sourced live here: https://services1.arcgis.com/E5n4f1VY84i0xSjy/arcgis/rest/services/ACTGOV_BLOCKS/FeatureServer



Figure 3: Location of Broadacre Area (Blocks 1582 and 1653) in relation to 'Central Molonglo'⁷⁵

⁷⁵ ACTPLA n 71 (*Draft Variation to the Territory Plan No. 281*), Fig 2.2 on p. 20. A note attached to Fig 2.2's label states "Extract from 'Molonglo Valley Structure Plan' (Source: Annand Alcock Urban Design, May 2006) as amended by ACTPLA to respond to recent studies." This 2006 Structure Plan document cannot be located. The text referring to the figure states the image "is provided for information. Some of the features depicted in the plan, such as the arterial roads, commercial centre locations and the lake, are subject to continued technical investigation and further consideration by Government." Label identifying the location of Blocks 1582 and 1653 have been added.

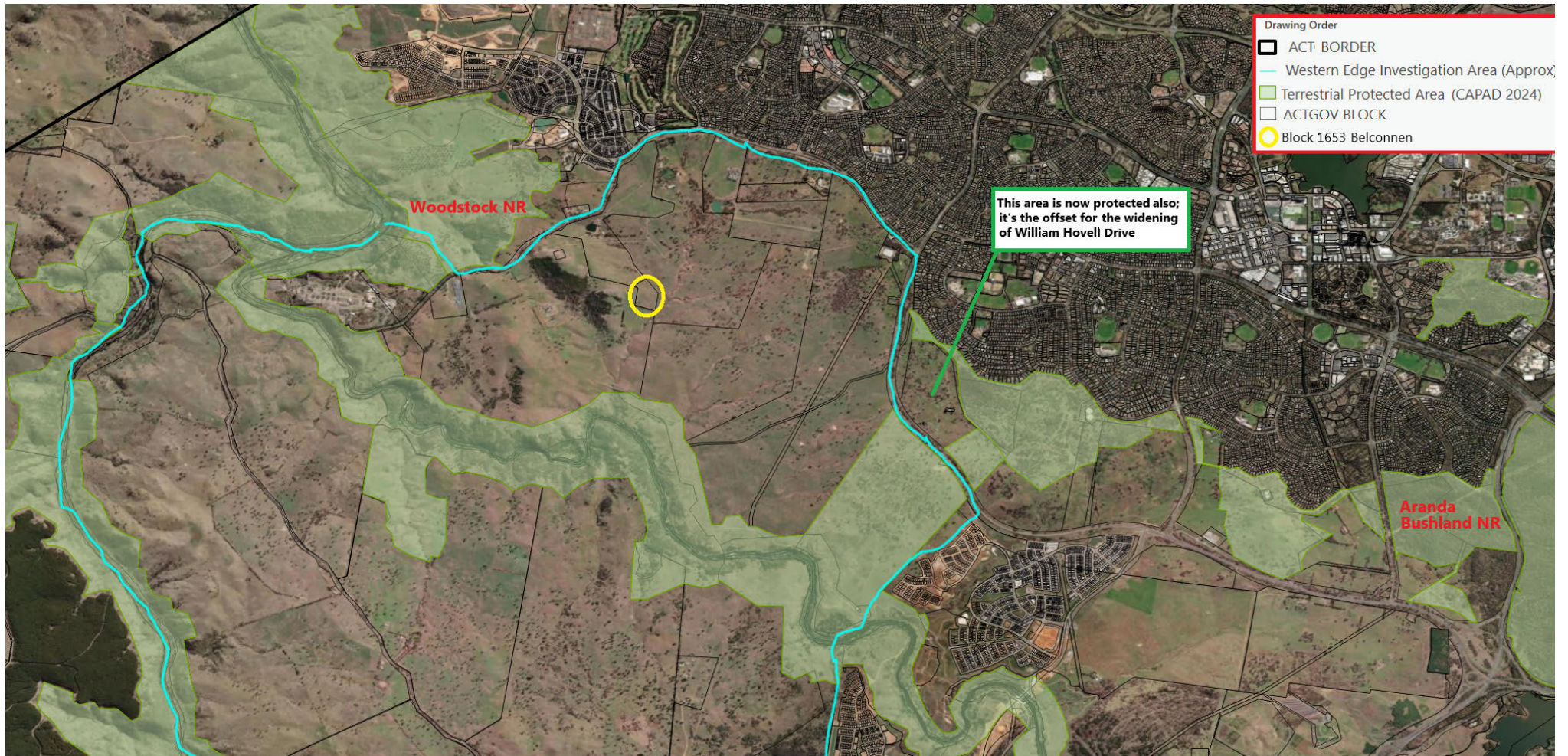


Figure 4: The situation of Block 1653 (yellow oval) in the local landscape⁷⁶

⁷⁶ **Figure 4** shows the *approximate* location of the WEIA with a hand-drawn aqua-coloured line. It shows terrestrial protected areas protect the lower Molonglo River catchment, and the beginning of a connection of woodland habitats between Black Mountain and Aranda Bushland in the east with Woodstock Nature Reserve in the west. Woodland habitats are connected east of William Hovell Drive but not in Central Molonglo. Terrestrial Protected Area data has been sourced live here: https://gis.environment.gov.au/gispubmap/rest/services/ogc_services/CAPAD/FeatureServer. 'ACTGOV BLOCK' data is sourced as per **Figure 2**. The WEIA is hand drawn as no shapefile containing this information has been found on any ACT Government website.

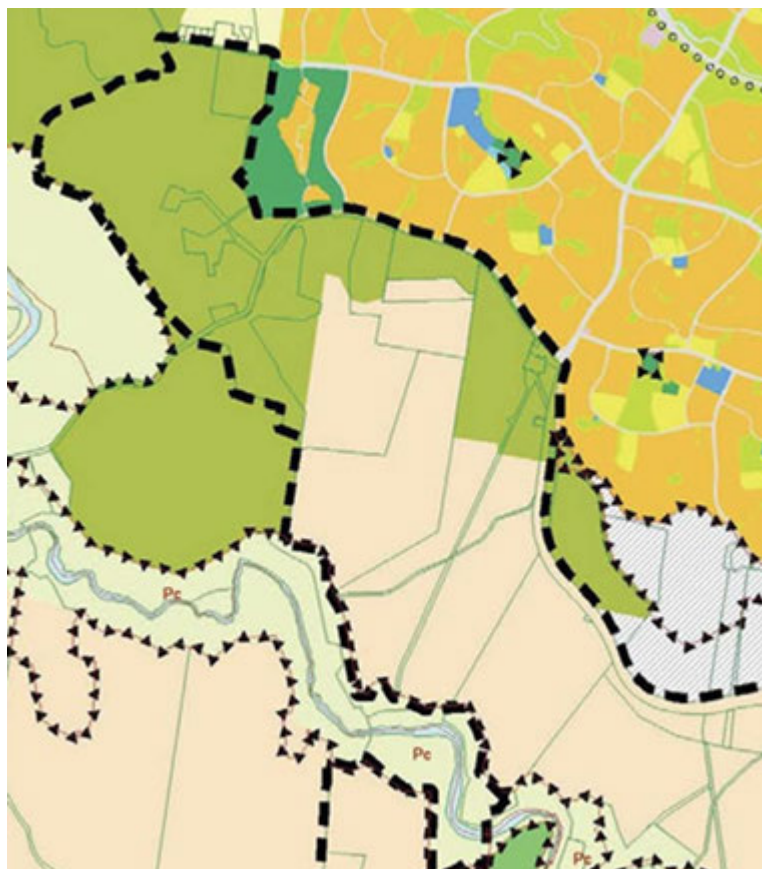


Figure 5: Territory Plan zoning as at Sep 2007⁷⁷

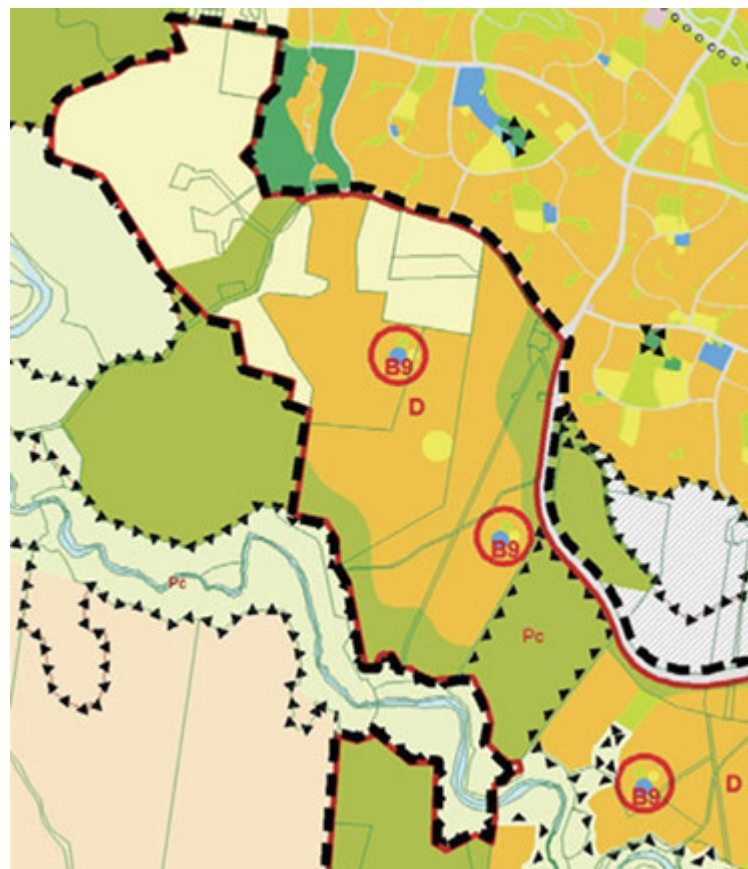


Figure 6: Territory Plan zoning proposed in Draft Variation 281

Territory Plan Map

LAND USE POLICIES

- Designated Areas
See National Capital Plan
- 1. Residential
- 2. Commercial:
 - A - Civic centre
 - B - Town centre
 - C - Group centre
 - D - Local centre
 - E - Corridors and Office sites
- 5. Restricted Access Recreation
- 9. Urban Open Space
- 10. Broadacre
- 11. Rural
- 12. Hills, Ridges and Buffer Areas
- 13. River Corridor
- 16. Major Roads

OVERLAYS

- Area Specific Policies
- Special requirements apply
See National Capital Plan
- Subject to Review
- Defined Land
See also Part 2 of Land Act
- Draft Variation to the Plan having interim effect. See Part 2 of Land Act
- Clearance Zone Policies
- Urban Open Space
Excluded from Public Land
- Type of Public Land Reserve
See also Schedule 1 of Land Act
- Public Land (Arrows point inwards)
See also Part 5 of Land Act
- Special requirements apply flanking
- Main Avenues and Approach Routes
See National Capital Plan
- Intertown Public Transport Route

Area Subject to the Variation

⁷⁷ Figures 5-6 are extracts from, i.e., they are the northwestern portions only, of two images in: ACTPLA n 71 (Draft Variation to the Territory Plan No. 281), pp. 21, 37. Selected portions of the Legends associated with those two maps are included to the right of Figure 6. Note that, until 28 April 2008 with interim effect[#], and from 9 Oct 2008, Block 1582 was zoned 'Hills, Ridges and Buffer Spaces' (Figure 5). The rezoning proposed (Figure 6) included changing: Block 1582 to Broadacre Area, which occurred on 9 Oct 2008; and much of the rest of Central Molonglo to 'Residential', which did not occur; [#]Planning and Development (Draft Variation No 281) Notice 2008 Molonglo and North Weston (NI2008-134), www.legislation.act.gov.au/ni/2008-134/

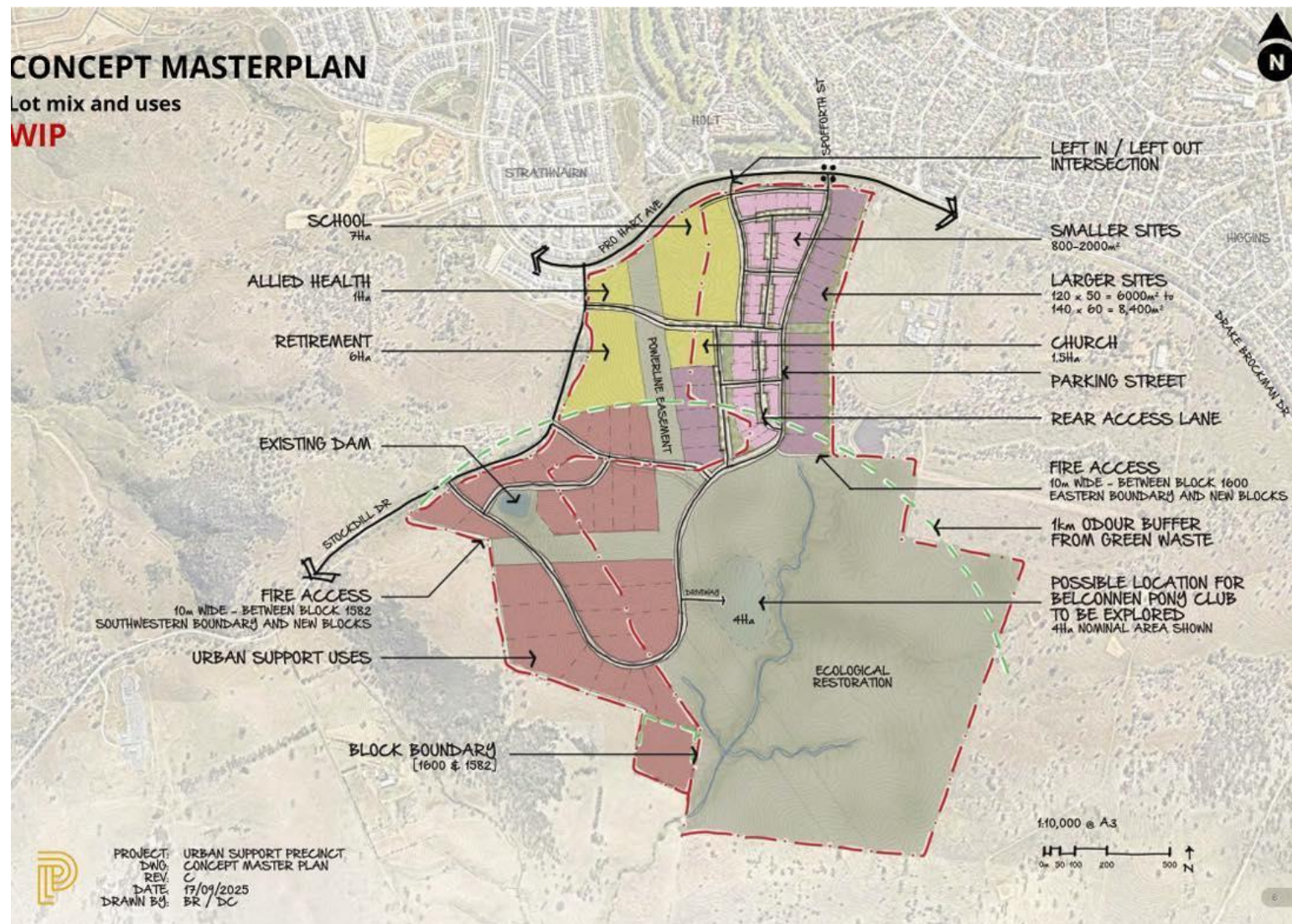


Figure 7: The Suburban Land Agency 'Concept Masterplan' of development proposed on blocks 1582 and 1600 Belconnen (December 2025)⁷⁸

⁷⁸ Belconnen Community Council (3 Mar 26) Post, <https://www.facebook.com/belcouncil/posts/pfbid02tahL1k9ydmaszwmXmUKdkkhJx1aZMnDdmdP7ndioaSgBteZkpL3DStU7ngRkbhYI>, viewed 1 May 26; Bushnell, I. (26 Feb 2026) Survey launched on proposed West Belconnen business and services precinct, In *Region*, <https://region.com.au/survey-launched-on-proposed-west-belconnen-business-and-services-precinct/945036/>; We have confirmed with the SLA that the SLA did indeed release the Concept Masterplan to the Belconnen Community Council.

Figure 8: Belconnen District Strategy Plan

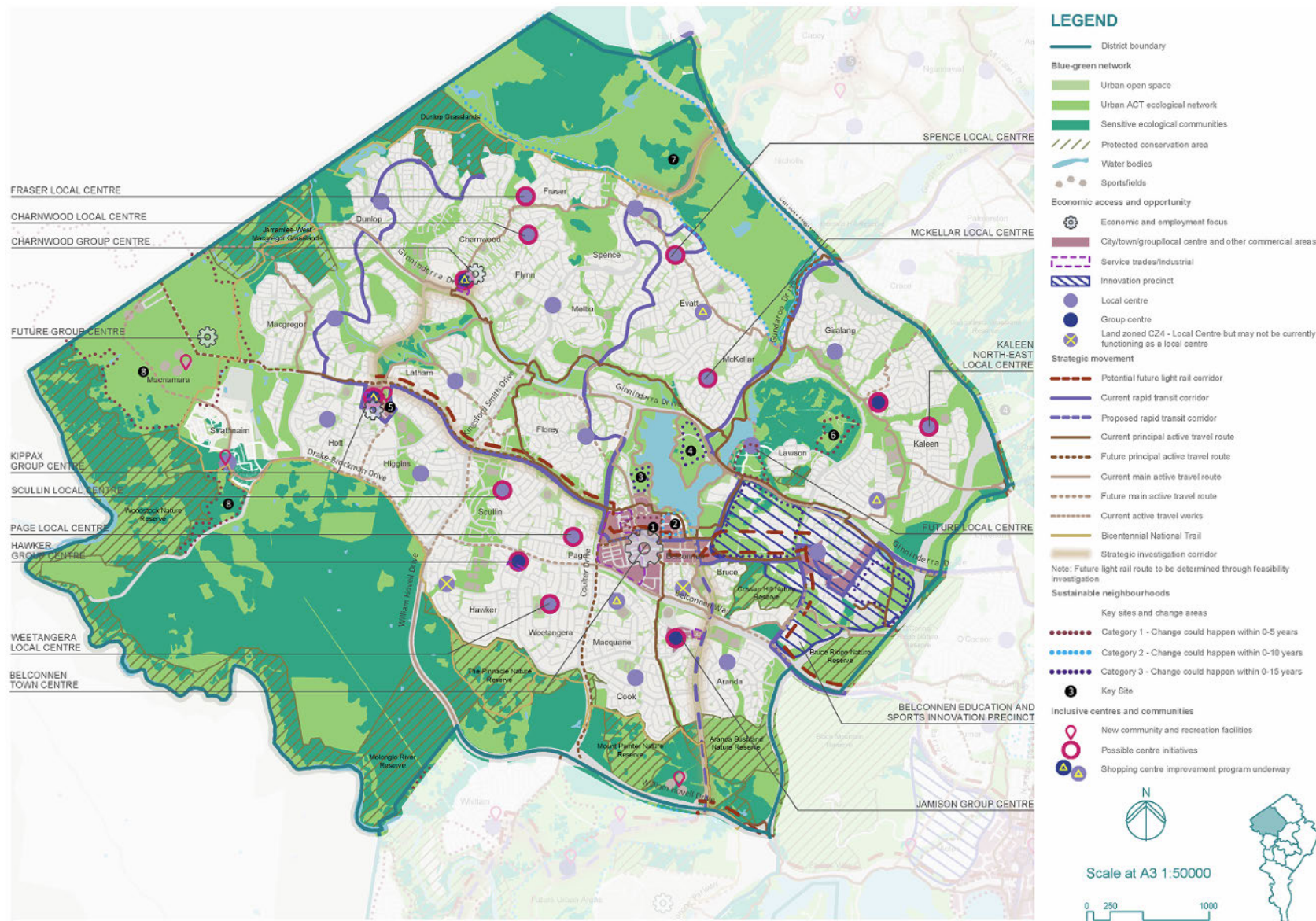


Figure 8: Belconnen District Strategy Plan, in the *Belconnen District Strategy*⁷⁹

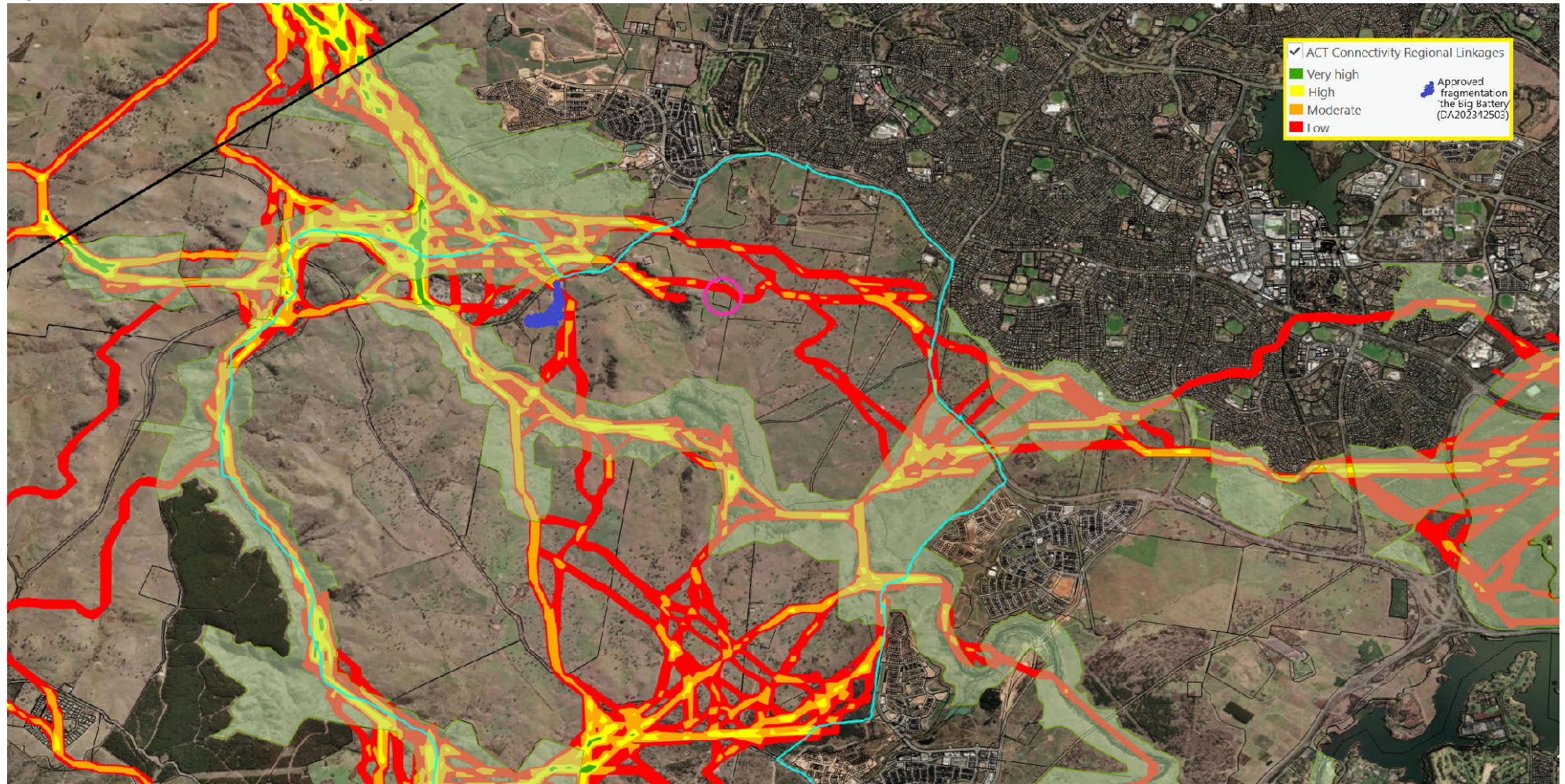


Figure 9: ACT Government mapping shows bird and mammal connectivity in the landscape⁸⁰

⁷⁹ ACT Government n 6 (*Belconnen District Strategy*), Figure 8 on p. 15. Central Molonglo is: identified as including part of the 'Urban ACT ecological network' and 'sensitive ecological areas'; not identified as an area where change will occur within 15 years (of the approval of the strategy in 2023)

⁸⁰ Figure 7 shows the same things as Figure 4 with the ACT Government's bird and mammal connectivity mapping added. In this image, the location of Block 1653 is depicted with a *pink* oval shape. Approved fragmentation yet to occur is depicted in blue, i.e., it is the future site of the 'Big Battery' (DA202342503). Connectivity mapping is sourced as follows: ACT Government (online) *Modelled Regional Connectivity Linkages* for generalist species (birds and mammals), https://services1.arcgis.com/E5n4f1VY84i0xSjy/arcgis/rest/services/ACTGOV_Connectivity_Regional_Linkages_Poly/FeatureServer

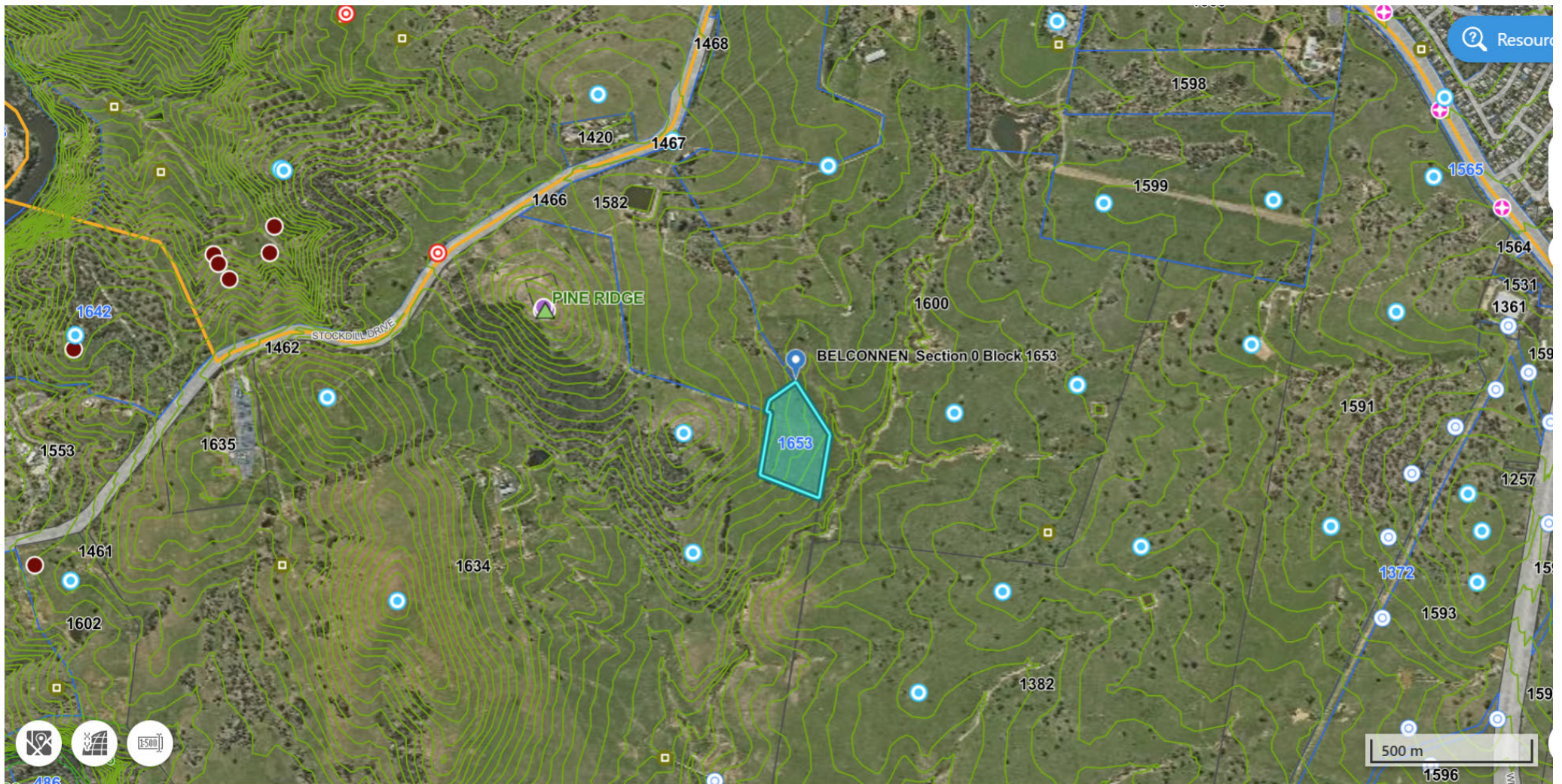


Figure 10: Topography in the landscape (6 metre intervals)⁸¹

⁸¹ Figure 8 is ACT Government mapping of topography in the landscape. Block 1653 (highlighted) has a steep slope; contour lines shown are at six metre intervals. Topographical information is sourced as follows: ACT Government (online) *ACTmap Survey Map*, <https://apps.vertigisstudio.com/web/?app=6f461ff64e264993912557f79896b9a9>

Representation for EIS or Territory Plan Amendment Notification - Submission confirmation

Your submission has been successful. Please keep a copy of this receipt for your records.

Date and time

20 Jul 2026 1:13:49 PM

Reference code

J6D9PCCY

Access Canberra

GPO Box 158
Canberra City, ACT 2601

Phone: (02) 6207 1923
acepdcustomerservices@act.gov.au

Type of representation

About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification ▼

Representor details

Title

▼

Given name*

Family name*

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

Reject DPA-14
Reassess alternative sites
A permanent green waste facility should not be permitted at Block 1653
Need shops, sports, health and better transport facilities

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

Disclaimer

Your personal information will be managed in accordance with the *Information Privacy Act 2014* and the Environment, Planning and Sustainable Development Directorate (EPSDD) [Information Privacy Policy](#), which is available for viewing on EPSDD's website.

Copies of written comments will be made available on the authority website unless the submission is withdrawn. Copies of written comments will also be given to the proponent of the development proposal.

If you would not like your comments or a part of your comments to be made available on the website or to the applicant, a request must be made under Sections 502 or 503 of the *Planning Act 2023* (or Sections 411 or 412 of the *Planning and Development Act 2007*). A request for exclusion under these sections must be in writing, clearly identifying what parts of your submission you are seeking to exclude and how the request satisfies the exclusion criteria.

Printed copies of the draft amendment (this document) and background documents are available for inspection and purchase at the EPSDD Customer Service Centre, 8 Darling Street, Mitchell, Monday to Friday (except public holidays) between 8:30am and 4:30pm. Please call [\(02\) 6207 1923](#) to arrange a copy for purchase.

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About this form

Use this form to lodge a representation for a current amendment to the Territory Plan or a current Environment Impact Statement during the notification period.

Application type

Please select the application type:*

Territory Plan Amendment Notification ▼

Representor details

Title

■ ▼

Given name*

■

Family name*

■

Organisation name

Enter at least one phone number: *

Home phone

Work phone

Mobile

Email address*

Application details

Amendment number*

Provide the details of your representation*

Dpa is inconsistent with the Territory Act and Belconnen district policy - a permanent green waste facility should not be permitted at block 1653. Reassess alternative sites. Reject dpa-14.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

Disclaimer

Your personal information will be managed in accordance with the *Information Privacy Act 2014* and the Environment, Planning and Sustainable Development Directorate (EPSDD) [Information Privacy Policy](#), which is available for viewing on EPSDD's website.

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☐ [Click here for more information on applying for exemption from the public register.](#)

Submission to Territory Planning Authority

Draft Major Plan Amendment 14 – Belconnen green waste recycling facility and bulk landscape supplies

Thank you for the opportunity to comment on Draft Major Plan Amendment 14 (DPA-14) – Belconnen green waste recycling facility and bulk landscape supplies on Belconnen Block 1653.

[REDACTED] I am responding in my personal capacity. I commend the ACT Government's commitment to maintaining a green waste recycling facility in north Canberra. I do not however support the DPA-14 to allow the Territory Plan to be amended to allow 'recycling' and bulk landscape supplies. The information provided in the consultation documents is misleading and often incorrect. I urge the Territory Planning Authority (TPA) to reject the expanded land uses Block 1653 as alternative land uses outlined in this submission are more consistent with the Territory Plan and Belconnen District Strategy, and because the risks and costs have not been adequately covered to support the argument for DPA-14. Of particular concern are ecological risks within the broader landscape. DPA-14 also pre-empts the Western Edge Investigation, of which the subject area is an essential component. This proposal reflects poorly on the professionalism and credibility of the TPA which has accepted information provided by the Suburban Land Agency (SLA) at face value, thereby contributing to a lack of public trust in Territory planning processes.

Key Concerns

Integrity

Supporting information, which is cursory in nature (excuse the pun), is provided for Block 1582 and not Block 1653 and so cannot be relied upon. The supporting documentation notes that the current zoning for the subject area is Non-Urban NUZ1 Broadacre Zone and that the planned land uses are not inconsistent with the Territory Plan. If that is the case, surely there would be no need for this Major Plan Amendment. The information provided is poor quality and appears to have been cherry-picked to suit the SLA's agenda. The SLA's letter to the National Capital Authority did not disclose that another temporary site had been found for the green waste facility so this no longer represents an obstacle to housing development in Ginninderry. Such information may have influenced the National Capital Authority's position. The proposed amendment should therefore be rejected, referred to the relevant parliamentary committee or Integrity Commission to find out why important information was not disclosed, or the DPA delayed to allow the alternative site to be certified, and to enable assessment of the materiality of information gaps.

Lack of Clarity

It is unclear whether the amendment would enable the establishment of a permanent green waste recycling facility and sale of bulk landscape supplies without an associated Development Application if the existing DA for the temporary facility is permitted as a proxy? The TPA/SLA should disclose whether this is the intention. Clarification, further information, and if necessary, legal advice is needed.

Odour Buffer Zone Requirement Not Met

The odour buffer zone for the subject location is 1000 metres from residences. The farmhouse on adjacent Block 1634 is less than 1000 metres from the proposed facility, as is Block 1420, the latter of which is zoned RZ1 (ie. residential). Block 1653 is therefore not a suitable location.

Availability of Another Temporary Site

I commend Riverview on its efforts to facilitate a more appropriate temporary green waste site further along Parkwood Road and acknowledge the uncertainty around site remediation potentially impacting its consideration as an alternative site. There now appears no reason to establish a temporary green waste recycling facility on Block 1653. It is clear that Parkwood is a much better site, with its topography more in keeping with similar green waste facilities in other Canberra locations. The block is much flatter and not surrounded by critically endangered ecological communities and vital Superb Parrot breeding habitat. It appears that Block 1653 would require a sediment pond and expensive weed abatement programs to avoid erosion, run-off and harm to adjacent fragile ecological communities - harm which would be the subject of hefty fines if it were to occur. As well as the financial impact, the environmental consequences would be devastating if the Government were to get it wrong.

Options do not appear to have been explored and debated for the inclusion of bulk landscape supplies in the proposed Territory Plan amendment. Surely bulk landscape supplies could be split from the 'recycling' facility? Has the TPA/SLA contacted Tharwa Sands on Parkwood Road to see whether that company could offer landscape supplies to builders, landscapers and the general public? It currently sells direct to businesses and government. I note however, that Tharwa Sands offers landscape supplies free of African Love Grass, Chilean Needle Grass and Serrated Tussock, so would be unlikely to accept green waste because that waste would inevitably contain those environmentally destructive weeds. In addition, I often see plastics mixed up in the green waste material that people drop off at Parkwood. It is a sign of the times unfortunately.

Inappropriate Strategic Positioning and Perceived Conflicts of Interest

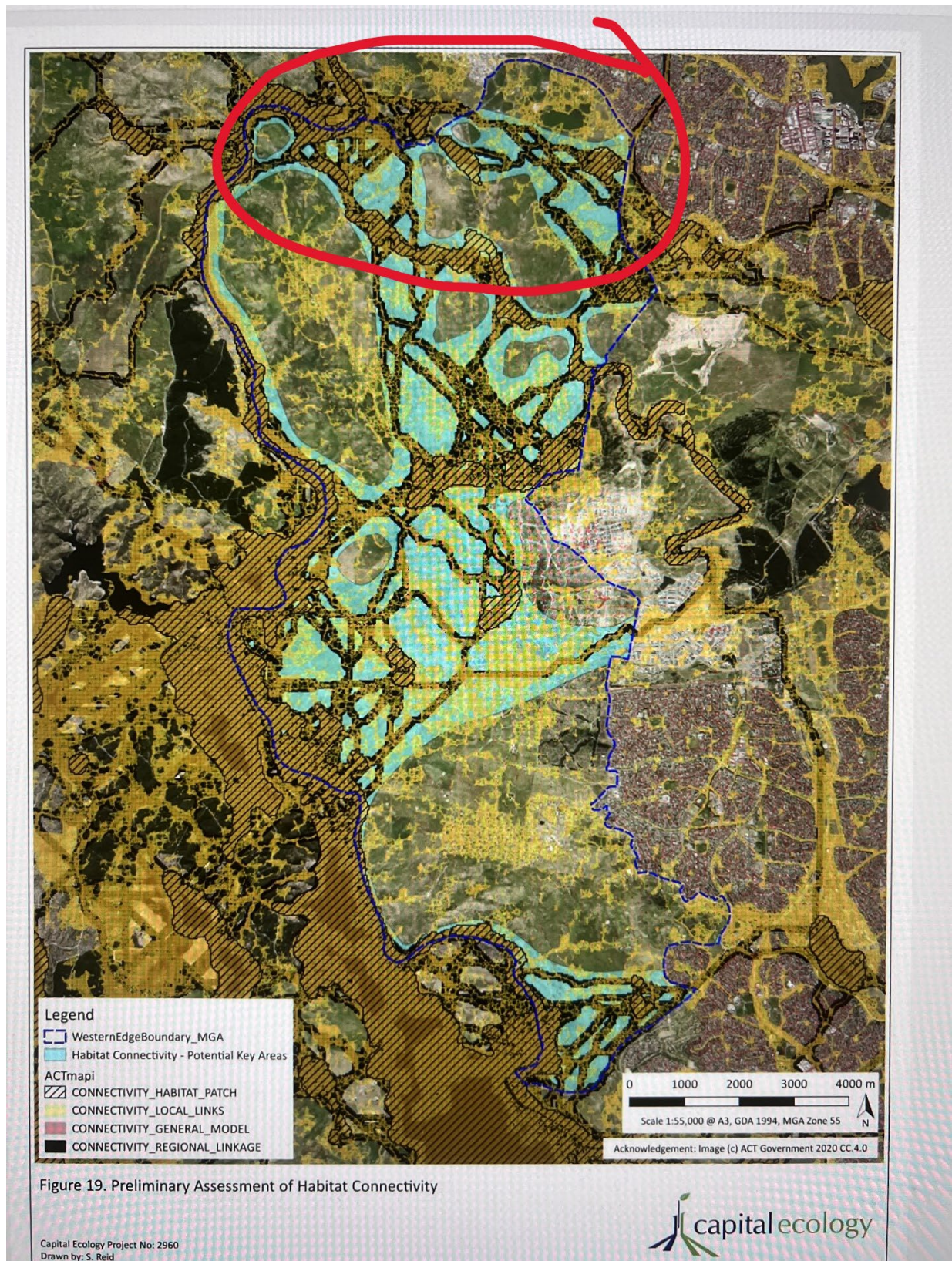
Information on the Ginninderry website indicates that the nearby horse agistment paddocks and Pace Eggs on Parkwood Road will continue to operate until 2035. Why then would the green waste site need to relocate again prior to the mid 2030s? There is no pressing need for the DPA-14 at this stage. This push speaks to another agenda. Is the TPA positioning to open up NUZ1 Broadacre zoning in non-urban areas for purposes which are instead consistent with urban zoning? The establishment of recycling as a land use would enable other forms of recycling as an assessable land use on NUZ1 broadacre in non-urban areas. The Cardno report recommends early positioning to lock in such activities (not the DPA, but the co-location of the green waste recycling and other waste facilities) as part of the Government's Western Edge Investigation. In this opportunistic vein, the SLA's decision to call a tender for a sub-division masterplan for adjacent Blocks 1582 and 1600 without broadly informing the general community of the tender or the nature of the concept plan, or without having flagged a change proposal for Central Molonglo (of which these blocks form a part) within the Belconnen District Plan, is disgraceful. This is not consistent with the Belconnen District Plan.

At Pialligo, landscape businesses, including those that sell bulk landscape supplies, occur on land that is NUZ1 broadacre urban classification, not non-urban, while at Mitchell zoning is industrial.

There are also perceived conflicts of interest in this proposal. Some of the parties that may benefit from such land use extensions may be businesses associated either directly or indirectly with the Ginninderry development. This is not to say that there is an actual conflict of interest, but the perception of conflict of interest would be hard to avoid if a related party or associate benefits. The same is true for the SLA who is the leaseholder of a number of properties on the Drake Brockman and Stockdill Road Corridor. There is a tension between ecological conservation and revenue targets.

Significant Ecological Role of Block 1653 Unacknowledged

Block 1653 is located in Central Molonglo. In 2008, the then Planning Minister, Andrew Barr, instructed the Planning Authority to remove Central Molonglo from consideration **in perpetuity** as a future urban area in recognition of this area's ecological significance and landscape value. The SLA nevertheless purchased much of this land. Notwithstanding the fact that Block 1653 is substantially modified and does not host threatened flora, this block can still be readily revegetated with fast growing wattles that would provide foraging habitat for Superb Parrots and other woodland birds, say, for example to offset tree loss on Drake Brockman Drive. It also performs a valuable buffer from urban fringe impacts and is important in maintaining connectivity along a very important wildlife corridor in an area that is already subject to habitat fragmentation due to large infrastructure projects along Stockdill Drive. In March 2021, Capital Ecology had previously identified Block 1582 as an important wildlife corridor for woodland birds. See Figure 19 – Preliminary Assessment of Habitat Connectivity reprinted from Capital Ecology's Western Edge Investigation: Preliminary Ecological Review, March 2021 (red circle my addition). This information was not included in the December 2021 Capital Ecology report provided by Ginninderry to the SLA to support the DPA-14. This type of "cherry-picking" is unhelpful in getting to the facts.



The trees on Block 1582 incorporating the entrance road, are foraging habitat for an important breeding colony of Superb Parrots. Common sense would suggest that large volumes of heavy and light vehicles along the entry route must surely pose a serious threat to that population. If road kill Superb Parrots can happen on a Murrumbateman rural road (and it has), then it can happen here on this site. In the event that the facility becomes the sole outlet for green waste in North Canberra as

seems likely, the traffic forecasts provided would likely represent a substantial under-estimation. Such a development absolutely should not be tolerated in such a sensitive area of Canberra's Blue-Green Network. In fact, the Territory Plan and the Belconnen District Strategy specifically call for the safeguarding of the Blue-Green Network to support the healthy ecological systems, whereas the Belconnen District Strategy only calls for a Green Waste Transfer facility somewhere in Belconnen.

The Western Edge Investigation

Figure 3 – Policy Plan map is incorrect. The land south of Drake Brockman and Stockdill Drives, which includes Block 1653 is in the Western Edge Investigation Area. The Cardno report and many other studies already completed for the Western Edge Investigation confirm this. The ACT Government committed to not making any decisions about development in the Western Edge until investigations have concluded. This process is still underway. Decisions of this nature should therefore be deferred.

I note that in 2021, Capital Ecology urged the Government to act to prevent degradation of ecological values in the Western Edge Investigation Area. Central Molonglo and its NUZ3 buffer was identified as a particularly important area. Please clarify how the SLA has been carrying out its environmental stewardship responsibilities in relation to Central Molonglo.

Conclusion

In conclusion, I do not support DPA-14. It has many flaws of process and significant information gaps. Approval of the DPA-14 will only encourage sub-standard future proposals. These flaws should be investigated either by the relevant parliamentary committee or by the Integrity Commission to assess the basis of the decision making process and the materiality of information gaps. Finally, environmental stewardship must count for something. It should represent more than just talking points.

Thank you for considering this submission.

Kind Regards

[Redacted Signature]

To: Territory Plan and Coordination Section, CED (480 NBA)
Access Canberra Building Services Shopfront

From: [REDACTED]
[REDACTED]
[REDACTED]

Dear Territory Plan and Coordination Section, CED,

Comment on Draft Major Plan Amendment 14 – Belconnen green waste recycling facility and bulk landscape supplies

I recommend that Draft Major Plan Amendment 14 (DPA-14) should be withdrawn and other alternative sites be considered, for the following reasons:

- While supporting materials state the Territory Planning Authority (Authority) proposes DPA-14 to permit a green waste facility and bulk landscape supplies on Block 1653 Belconnen, the proposal does not:
 - Sufficiently define the permitted uses:
 - The wording ‘recycling facility’, would permit any category of materials to be recycled on the block, not just green waste.
 - The wording ‘bulk landscape supplies’ does not indicate if these supplies are for consumer or industrial use. If they are for industrial use, such as to support suburban development, this would greatly increase the scale and impact of the facility.
 - Explain to what extent the Authority intends to pursue the two-step development plan proposed in the Cardno *Design Options Study*, submitted as a background paper. The study proposes beginning with a green waste facility before expanding the facility to a full-scale Resource Management Centre including landfill. The lack of explanation of the extent to which the proposal intends to implement the design options outlined in the study makes it impossible to assess the relevance of the background paper to the proposal. If the larger scale Resource Management Centre is planned, the full scale and impact and the appropriateness of this site for that development should be assessed before proceeding with stage one of the plan.
- The proposed plan is inconsistent with the ACT Planning Strategy because it proposes additional assessable development for rural block 1653 Belconnen that is not permitted under the block’s Broadacre zoning classification of NUZ1. Developments in NUZ1 should not adversely impact or visually intrude on the landscape and environmental quality of the locality. The proposed zoning amendment would visually intrude on landscape indicated as an ecologically

sensitive part of Belconnen’s blue-green network in the Belconnen District Strategy 2023.¹ The proposal would adversely impact the environmental quality of the locality because the site is surrounded by ecologically sensitive NUZ3 areas. This is of great concern because the Supporting Report states there will be ‘potential runoff, erosion, and degradation of nearby waterway impacts as a result of stockpiling and material handling.’ It also states the site has ‘long to moderate slopes, and natural drainage lines that flow southward toward the Molonglo River.’ Any run-off from the site will therefore pollute the Molonglo River. While the Supporting Report states the environmental impacts ‘will be appropriately mitigated,’ the likelihood of mitigation being effective in this location is put in doubt by Professor Fiona Dyer, Professor in Water Science with the Centre for Applied Water Science and the Institute for Applied Ecology, University of Canberra, who states, ‘developments on the western edge of Canberra that drain directly into the Molonglo and Murrumbidgee Rivers are constrained by the steep landscape which has little room for traditional wetlands, ponds and lakes ... even some of the great examples of local developments that have made a genuine concerted attempt to follow best practice construction site management still have water quality impacts.’²

- The proposed plan is inconsistent with the ACT Planning Strategy because it is part of the Western Edge Investigation Area (WEIA). The WEIA was selected for investigation in the 2018 ACT Planning Strategy. The investigation has not concluded, and the ACT government says ‘there has been no Government decision made as to whether any development will proceed in the WEIA.’³
- The proposal is inconsistent with the Territory Plan because the block is situated in Central Molonglo, which the government directed be removed ‘in perpetuity from being considered as a future urban area’ in 2008.⁴
- The proposal is inconsistent with the Belconnen District Strategy 2023, which indicates the land containing Block 1653 Belconnen is an ecologically sensitive part of Belconnen’s blue-green network. The Strategy acknowledges the high value Belconnen residents place on green spaces and states that the government will ‘protect and enhance’ Belconnen’s blue-green network.⁵

¹ See Planning (Belconnen) District Strategy 2023 <https://legislation.act.gov.au/ni/2023-531/>, p. 40.

² Office of the Commissioner for Sustainability and the Environment, *Close to the Edge: An investigation into the effects of urban expansion on the environment of the ACT*, p. 153.

³ See <https://www.planning.act.gov.au/planning-projects/western-edge-investigation>

⁴ *Planning and Development (Plan Variation No 281) Direction 2008 Molonglo and North Weston* (NI2008 351), www.legislation.act.gov.au/View/ni/2008-351/20080822-37459/PDF/2008-351.PDF, point 3 in Annexe A

⁵ Planning (Belconnen) District Strategy 2023, Vol. 2, pp 26-27.

- The proposal is inconsistent with the National Capital Plan.
 - The permitted uses in the *National Capital Plan*'s non-urban categories — the NCOSS and Broadacre — are limited to purposes such as agriculture, forestry, nature conservation, recreation, parks, public utilities and, at most, retail plant nurseries. Waste facilities, recycling and industrial uses do not appear on those permitted-use lists. In the National Capital Plan, industry is confined to designated estates *within urban areas*. I submit that a permanent commercial recycling and bulk-landscape-supplies facility on non-urban land is inconsistent with the National Capital Plan.
 - While the NCA's letter records agreement to a use of Block 1582; the letter merely states a 'not inconsistent' test without giving reasons.
 - I recommend that the Authority seek the legal advice on which the NCA relied, sufficient to demonstrate DPA-14 is consistent with the National Capital Plan.
- Four of the six claimed positive impacts outlined in the Supporting Report are incorrect:
 - The statement 'the site is conveniently located away from sensitive land uses' is incorrect because it is surrounded on three sides by land zoned NUZ3 shown in the Strategy as 'urban ACT ecological network' containing areas of 'sensitive ecological communities.'⁶
 - The statement of amenity only considers operational impacts on 'residential populations to the north'. It does not consider operational impacts on the surrounding NUZ3 area.
 - The statement of 'appropriate land use transition: acts as a buffer use between peri-urban/broadacre land uses and adjoining urban areas and urban land uses' is incorrect. An industrial facility is not a 'buffer' and the site directly adjoins NUZ3 ecologically sensitive land.
 - The statement 'supports broader strategic objectives and targets' does not reference which 'broader strategic objectives and targets' are supported, so this statement cannot be assessed.
- The negative impacts are significant and include:
 - Constructing an \$8.5 million waste and resource facility on the sensitive site.
 - Heavy traffic into the site via a gravel road off Stockdill Drive that runs along the border with the NUZ3 area and will therefore impact the NUZ3 area.

⁶ Planning (Belconnen) District Strategy 2023, Vol. 2, Figure 12, p 26.

- Expanding permitted uses in NUZ1 against the intended policy of the zone to ‘not adversely impact or visually intrude on the landscape and environmental quality of the locality.’
- The admitted ‘potential runoff, erosion, and degradation of nearby waterway impacts as a result of stockpiling and material handling’ has not been assessed.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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DPA-14 submission — Belconnen green waste recycling facility and bulk landscape supplies

Provide the details of your representation*

Submission Objecting to Draft Plan Amendment 14 (DPA-14): Permanent Green Waste Facility at Block 1653, Stockdill Drive, Ginninderry

As a concern resident of Strathnairn this is my formal submission as an objection to DPA-14. The proposal to transition the temporary green waste site into a permanent fixture represents an incompatible land-use conflict that threatens local planning integrity, public health, and community safety.

The operation of a permanent organic waste processing facility generates significant bioaerosols, including fungal spores and bacterial pathogens. Sustained exposure to these biological agents, alongside noxious poses an unacceptable respiratory risk to nearby residents. Organic waste also increases number of pests and rodents. This risk is magnified for vulnerable demographics, specifically children at the adjacent school and elderly residents. Three people in my immediate household alone, have respiratory illnesses (asthma) and this could pose a serious health impact to us.

Stockdill Drive and the surrounding residential road network lack the structural capacity to safely handle sustained heavy vehicle and trailer traffic. Introducing constant heavy freight movements creates severe traffic congestion, accelerates road degradation, and introduces severe safety hazards for pedestrians, cyclists, and school children during peak drop-off and pick-up hours. We already have congested roads, trucks and cars that exceed the speed limit and road accident risks. I've reported multiple instances of wreckless driving to police.

This exact development footprint was rejected in 2022 due to overwhelming community opposition (over 120 formal objections). The current amendment undermines that democratic decision. When we bought land in Ginninderry this was not something we were made aware of.

The site was granted temporary approval strictly for a maximum of three years. Using DPA-14 to bypass this sunset clause sets a dangerous planning precedent. It also undermine the local community and residents of Strathnairn and Macnamara.

Failure to Assess Alternative Sites: No comprehensive regional assessment has been produced to justify why this specific residential buffer zone is superior to isolated industrial zones on the north side.

Bushfire risk to our community: Placing a large-scale organic fuel source within a recognized bushfire-prone area presents an unjustifiable risk to the expanding Ginninderry footprint. Over the years I have seen multiple fires at Parkwood from overheated mulch piles. Fires can spread rapidly and spiral out of control under favourable conditions. Again other sites need to be explored as suitable sites in ACT.

Contaminated of water

There are far more concerns to address in our community that is of higher priority:

- Lack of shops and bus routes direct to Belconnen.
- Address other issues such as crime and safety in the area.

Conclusion & Requested Remedies

The ACT Government must prioritize providing basic needs such as local shops, direct bus routes, instead of industrial zoning in growing residential hubs. I formally request that the Government:

- * Disallow DPA-14 in its entirety.
- * Enforce the original three-year decommissioning timeline for the temporary site.

I call for ACT government to mandate an independent Health Impact Assessment (HIA) before any further north-side organic waste sites are considered.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
- A maximum of 5 files can be uploaded.

Disclaimer

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DPA-14 objection to amendment and green waste facility

Provide the details of your representation*

I live in Strathnairn, and I do not think DPA-14 should go ahead. I think making the temporary green waste site into a permanent one is a bad idea. It is too close to where families live, and I worry it will make our community less safe and healthy.

I did not know about this before but I also found out that this same idea was rejected in 2022 because many people were worried too. Why doesn't the Government listen to the community instead of trying again? When my family bought our land in Ginninderry, we did not know this could become a permanent waste site nearby.

The green waste site was only supposed to be there for three years. I do not think it is fair to change the rules now and make it permanent. Today it's a bulk green waste site, tomorrow it could become a dump site for asbestos and scrap metal.

The green waste site can make bad smells and tiny things in the air that people cannot see. These can make it harder for people to breathe so I am worried it could make them sick. I am also worried because there is a school nearby, and children and older people could be affected too. The waste could also bring more rats, mice, and other pests into our neighbourhood.

The roads around Stockdill Drive are already very busy. There are lots of trucks and cars, and some people drive too fast. If more trucks come every day, the roads will become even more dangerous. I worry about children walking or riding their bikes to school.

I also think the Government should look at other places instead. Maybe an industrial area would be a better place because it is farther away from homes and schools.

Another big thing that worries me is bushfires. If there is a big green waste site near our homes, it could be dangerous if a fire starts. We are not far away at all. If our house burns down from a fire starting by green waste site, who is responsible? ACT government? Who builds our house again?

We don't have shops here. My kids take an hour to get to school on bus to Jamison. My kids feel unsafe because there is crime. Better safety and less crime. we need more road exits in case of fire. Why are these not priority instead?

Conclusion

I hope the ACT Government says no to DPA-14. I also think it's terrible that a permanent organic waste site be put near people's homes.

Please listen to the people who live here. We want our community to be safe, healthy, and a nice place for families to live.

You may upload any additional supporting documentation or photos.

- Maximum file size is 10Mb.
 - A maximum of 5 files can be uploaded.
-

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DPA-14

Provide the details of your representation*

I strongly oppose DPA-14 and the proposal to make the temporary green waste site on Stockdill Drive permanent.

My family lives in Strathnairn, and when we bought our land in Ginninderry, we had no idea that a temporary green waste site could become a permanent waste facility so close to our home. If we had known this was even a possibility, it would have affected our decision. People may not want to live here if they know this is what will happen.

The green waste site was only meant to be there for three years. I don't think it's fair to change the rules now and make it permanent. It also makes people lose trust in the planning process. If a temporary facility can suddenly become permanent, what's stopping it from expanding even more in the future? Why is it not a longer period of public consultation and I find out through others living in the area. This does not appear like a transparent process at all. Quite frankly it seems questionable and disappointing.

Green waste sites can asthma or other health problems. I have asthma and this may exacerbate it. There is also a school nearby, so this isn't just about the people living closest to the site. What about young children? Why should they have to be exposed to the small particles from a bulk waste site?

Bushfire risk is another major concern. A large green waste site contains a lot of material that can burn. If a fire started there, it could put nearby homes and families at risk. We live very close to the site, and that's frightening. If homes were destroyed because of a fire would the ACT Government compensate families and rebuild their homes? These questions need to be answered before any decision is made.

Traffic is already a problem on Stockdill Drive. A permanent waste facility would bring even more heavy vehicles into the area, making the roads more dangerous.

Many people in the area worry about safety and crime. We need better road access and more exits in case there's a bushfire or another emergency. These are the things the Government should be focusing on instead of making this waste site permanent.

I also think the Government should look at other locations. An industrial area would make much more sense because it would be further away from homes, schools and growing communities.

Conclusion

ACT Government must reject DPA-14.

Strathnairn and Ginninderry are growing communities where families have chosen to live because they want a safe and healthy environment. A permanent organic waste facility doesn't belong so close to people's homes. Please listen to the people who live here. We deserve clean air, safe roads and a community where families can feel secure, not a permanent waste facility right next to our neighbourhood.

You may upload any additional supporting documentation or photos.

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-

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