



Ginninderry

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Department of Agriculture,
Water and the Environment
John Gorton Building,
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27 July 2022

Audit Review Report – EPBC SA024 West Belconnen Strategic Assessment Compliance Audit

Dear 

In line with the recommendation of the independent Audit Review Report prepared by Umwelt (July 2022), this letter has been prepared to acknowledge the non-compliance as identified in the findings of this report.

As per the direction of the Department, the Audit Review Report was due for submission to the Department on 18 July 2022. The Audit Review Report was submitted to the Department on 14 July 2022.

The Audit Report found that Riverview Projects are compliant with the majority of compliance requirements under EPBC SA024. Four non-compliances were identified, two administrative in nature and two in conservation outcomes.

The two administrative non-compliances pertain to –

- Condition 6 – The Ginninderry Conservation Trust was established 2 years and 4 days after the date of the endorsement of the Program Report.

Condition 6 required the Ginninderry Conservation Trust to be established two years from the endorsed Program Report. With the acknowledgement of Condition 6 as a non-compliance, please advise how this should be expressed in the 2021-22 Annual Report and future Annual Reports.

- Condition 20 – The Audit Report identified there was a lag time between when an approved plan was endorsed and published on the Ginninderry website.

In consideration of Condition 20, a requirement of publishing documentation within a month of an endorsed plan is not specified. However, in consideration of best practices and Riverview becoming aware, the Project will publish plans on the Ginninderry website promptly.



Suburban Land
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Developments

The two conservation non-compliances pertain to –

- Condition 3 – The requirement for environmental rezoning of Lot 2 Wallaroo Road is in-line with the requirement for Golden Sun Moth Environmental Offset.

Lot 2 Wallaroo Road was purchased by the ACT Government, Suburban Land Agency off the open market from the Federal Government to secure the Golden Sun Moth habitat for Ginninderry Project - when the Ginninderra Drive extension takes place. The GSM offset area required for the Ginninderry Project is 33.1 ha while the Lot 2 area in its entirety is 86.8 ha. The Ginninderry Project does not own Lot 2, only the GSM offset has been secured and dedicated for the Ginninderry Project. The Ginninderry Project would like to discuss how the EPBC SA024 conditions accurately reflect the Ginninderry Project's environmental commitments.

- Condition 5 – Considers a legally binding mechanism for securing the conservation of the NSW Conservation Corridor land, to be approved by the Department.

The NSW rezoning is a legally binding mechanism which secures the Ginninderry Conservation Corridor in perpetuity for the Ginninderry Project. The rezoning of the NSW conservation land was approved by Yass Valley Council and the associated entities which considered the Parkwood Planning Proposal. Any other zoning consideration from the now zoned environmental land, would be at odds with the Ginninderry Development and would require Yass Valley Council and NSW Planning consent. Whilst the Audit Report states Condition 5 is a non-compliance, Riverview is of the view that a legally binding mechanism has been put in place in perpetuity through environmental zoning of the NSW portion of the Ginninderry Project.

Observation Condition 8-9

The Audit Report made observations concerning Conditions 8 & 9 which pertain to the implementation of the Ginninderry Conservation Corridor 2018-2023 Interim Management Plan and the Offset Management Plan and the opportunity to incorporate the implementation of how these conditions are being managed in the Annual Report. Noting feedback from the first Audit Report, which included these additional tables associated with Condition 8 & 9, we propose to provide a link to the quarterly reporting to the ACT Government which directly addresses Condition 8 & 9 without adding duplicate tables to the Annual Report. We trust this will satisfy the Department's previous comments while ensuring Riverview is transparent in the Annual Reporting.

Thank you for your consideration of the above information.

Any queries, before our next meeting discussing the Audit Report EPBC approval matters at Ginninderry, please do not hesitate in contacting me on 0428 246 341.

Kind regards,

Imogen Featherstone

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Development Manager (Planning)