

## PROGRAM REVIEW REPORT

Ginninderry Strategic Assessment

**FINAL**

June 2023



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Ginninderry Strategic Assessment

### FINAL

Prepared by  
Umwelt (Australia) Pty Limited  
on behalf of  
Ginninderry

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Date: June 2023



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### **Document Status**

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# Executive Summary

The West Belconnen Strategic Assessment (now known as Ginninderry) was granted approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) in September 2017 (EPBC SA024), facilitating the commencement of urban development of Ginninderry: a cross border, sustainable community of four suburbs, with substantial land set aside for conservation along the Murrumbidgee River (hereafter referred to as the Ginninderry Project).

The Program Report (A T Adams Consulting, 2017) sets out a program of works, actions, management and funding arrangements, and commitments for the protection of matters of national environmental significance (MNES) within the Ginninderry Project Area. The EPBC Act Approval conditions include substantial conservation actions to be completed both within the Ginninderry Conservation Corridor and the future urban areas.

Over the past five years, the Strategic Assessment has been implemented by Riverview Projects (ACT) Pty Ltd (Riverview Projects) as the Development Manager for the Ginninderry Project. Key achievements include:

- The establishment of the Ginninderry Conservation Corridor and implementation of commitments for its protection and management
- The establishment of the Ginninderry Conservation Trust to oversee the management and implementation of the Ginninderry Conservation Corridor Management Plan
- The establishment of golden sun moth reserves, related to the potential future Ginninderra Drive extension, and development of the Gooromon Grasslands Offset Management Plan 2018-2023 for these reserves
- Preparation and adoption of the Ginninderry Development Construction Environmental Management Plan Framework for all construction works in the Ginninderry Conservation Corridor and urban areas
- Reassessment and mapping of matters of national environmental significance (MNES) in the Ginninderry Conservation Corridor and urban areas to improve the accuracy in the knowledge of their extent of occurrence
- The implementation of cat containment in the urban areas as they are developed.

This is the first Program Review Report prepared for the Ginninderry Project. This report provides an evaluation, review, and summary of progress over the preceding five years in achieving the conservation commitments and outcomes as defined by the Program Report. In addition to the implementation success of the Ginninderry Project, the report considers changes or additional flexibility needed to allow for its continued successful implementation and provides discussion on key challenges that have arisen over the preceding five years. The report concludes with recommendations for improving future implementation of the Ginninderry Project. Riverview Projects will continue to work with the Australian and ACT governments to deliver these recommendations.

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# 1.0 Introduction

## 1.1 The West Belconnen Strategic Assessment

The West Belconnen Strategic Assessment (now known as Ginninderry) was granted approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) in September 2017 (EPBC SA024), facilitating the commencement of urban development of Ginninderry: a cross border, sustainable community of four suburbs, with substantial land set aside for conservation along the Murrumbidgee River (hereafter referred to as the Ginninderry Project).

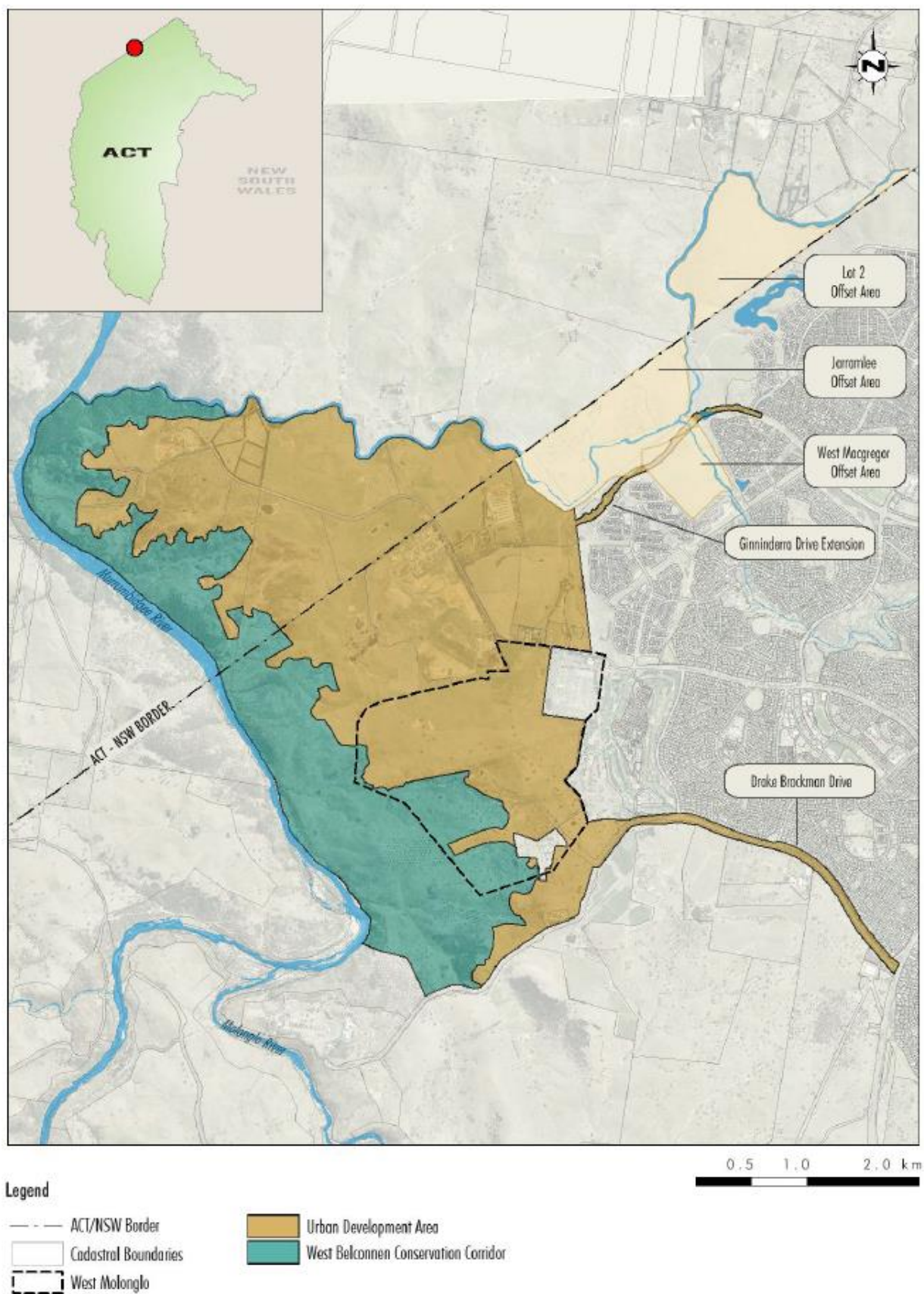
The Ginninderry Project Area stretches from the north-western suburbs of Canberra (Holt and Macgregor) across the ACT/NSW border into the Yass Valley (**Figure 1.1**). It is bounded on two sides by the Murrumbidgee River and Ginninderra Creek. To date, the Ginninderry Project has delivered the estate works for the suburb of Strathnairn, with Macnamara estate works having commenced in line with partial approval in 2021 (**Section 2.1**).

The EPBC Act Approval conditions include substantial conservation actions to be completed both within the Ginninderry Conservation Corridor (GCC) and the future urban areas. These conditions can be briefly summarised as:

- The establishment of the GCC and implementation of commitments for its protection and management.
- The establishment and funding of the Ginninderry Conservation Trust (GCT) to oversee the management and implementation of the Ginninderry Conservation Corridor Management Plan (GCCMP).
- The establishment of golden sun moth (GSM) reserves, related to the potential future Ginninderra Drive extension, and development of the Gooromon Grasslands Offset Management Plan 2018-2023 for these reserves.
- Preparation and adoption of the Ginninderry Development Construction Environmental Management Plan (CEMP) Framework for all construction works in the GCC and urban areas.
- Reassessment and mapping of matters of national environmental significance (MNES) in the GCC and urban areas to improve the accuracy in the knowledge of their extent of occurrence.
- Adoption of the Defined Process Strategy (DPS) as outlined in the Program Report for specific instances where it is triggered for impacts within the GCC beyond what is already described by the Program Report.
- The implementation of cat containment in the urban areas as they are developed.

Riverview Projects (ACT) Pty Ltd (Riverview Projects) is the Development Manager for the Ginninderry Project. The West Belconnen Joint Venture is a partnership between the ACT Government, represented by the Suburban Land Agency (SLA), and Riverview Developments as the private developer.





**Figure 1.1 Ginninderry Project Area**



## 1.2 The Program Review Report

Riverview Projects commissioned Umwelt (Australia) Pty Ltd (Umwelt) to prepare this Program Review Report (this Report) to satisfy the requirements of Condition 17 of their EPBC Act approval:

*Every five years and within six months from the date of endorsement of the Program, the approval holder must prepare a Program Review Report. The Program Review Report will summarise progress over the preceding five years in achieving the conservation gains as defined by the Program, referenced against the conservation outcomes in Section 5 of the Program. The preparation of the Program Review Report will follow the preparation and submission of the Annual Report for that year to allow incorporation of its findings. The Program Review Report will be submitted to the NSW Office of Environment and Heritage for review prior to being submitted to the ACT Conservator of Flora and Fauna for endorsement. The finalised report will be submitted to the Department and made available to the public.*

The Program Report was endorsed on 17 July 2017 and this Report is due on 18 January 2023.

This Program Review Report was submitted to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on time, however due to delays in reviewing and providing comments, DCCEEW have granted an official extension until 14 July 2023 for Riverview Projects to publish the report on their website.

This Program Review Report has not yet been reviewed by the NSW Office of Environment and Heritage, or provided to the ACT Conservator of Flora and Fauna for endorsement. This review requirement is discussed as ‘Key Challenge 6’ in **Section 3.2**.

## 1.3 Objectives of the Program Review Report

The Program Report (A T Adams Consulting, 2017) sets out the program of works, actions, management and funding arrangements, and commitments for the protection of MNES within the Ginninderry Project Area. The purpose of the Program Review Report is to evaluate, review and summarise progress over the preceding five years in achieving the conservation commitments and outcomes as defined by the Program Report.

This Program Review Report is an opportunity to review the Program Report commitments against the practicalities of what can be delivered, or what should be delivered, in terms of environmental management practices. In accordance with Condition 17 of the EPBC Act approval, this Report provides a review of the conservation activities related to the commitments of the Ginninderry Strategic Assessment since approval of the Program (2017-2022).

The Report follows the preparation of, and incorporates the findings from, the most recent Annual Report 2021-2022, which was finalised in August 2022, and the Independent Audit (Umwelt, 2022). Following finalisation and endorsement of this Report, it will be made publicly available.

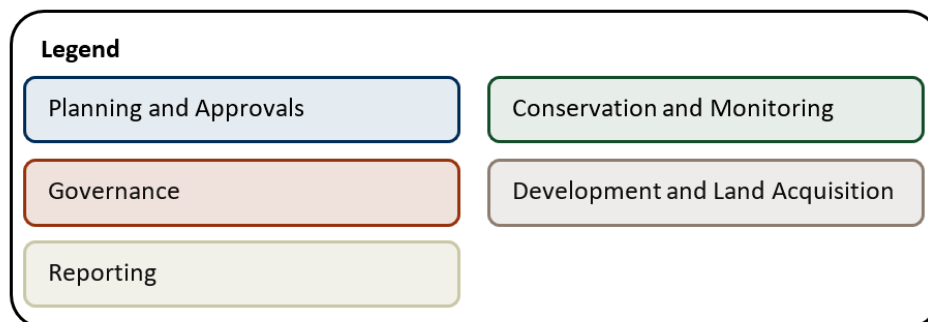
**The overall objective of the Program Review Report** is to review implementation success of the Program over the past 5 years to determine whether **any changes or additional flexibility** need to be considered to allow for the **successful implementation** of Program commitments. This may include recommendations to assist in achieving the conservation outcomes and commitments for MNES as specified in section 5 of the endorsed Program Report; recommendations to ensure consistency with statutory changes to action plans,

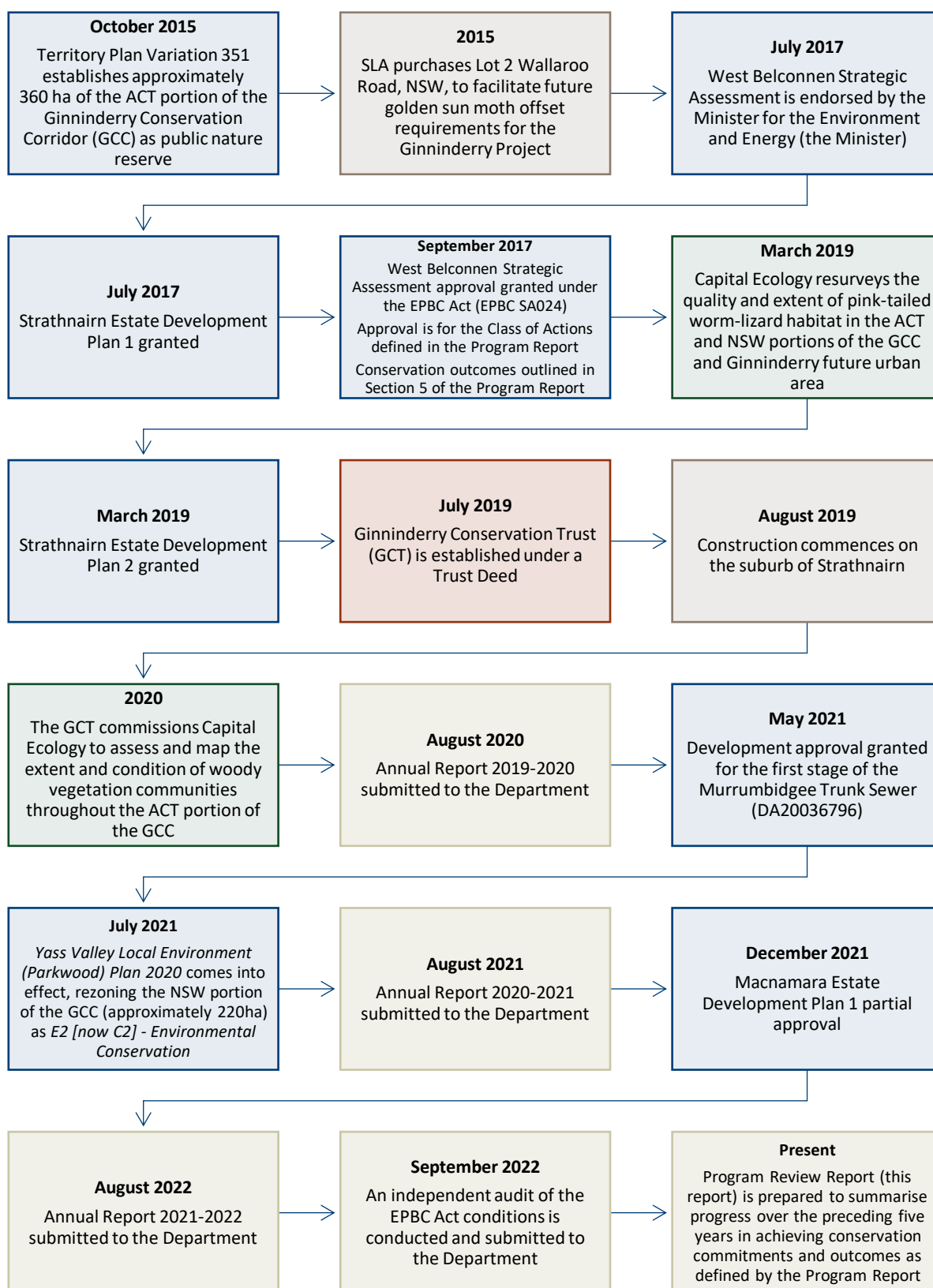
policy and legislation; or timeframes to incorporate monitoring outcomes and adaptive management into the Program and supporting plans.

It is recognised that there is no mechanism under the EPBC Act to vary an endorsed and approved Program Report, however EPBC Act conditions of approval may be amended.

## 2.0 Current Status

A timeline of the key events in the development and progression of the West Belconnen Strategic Assessment is included below.





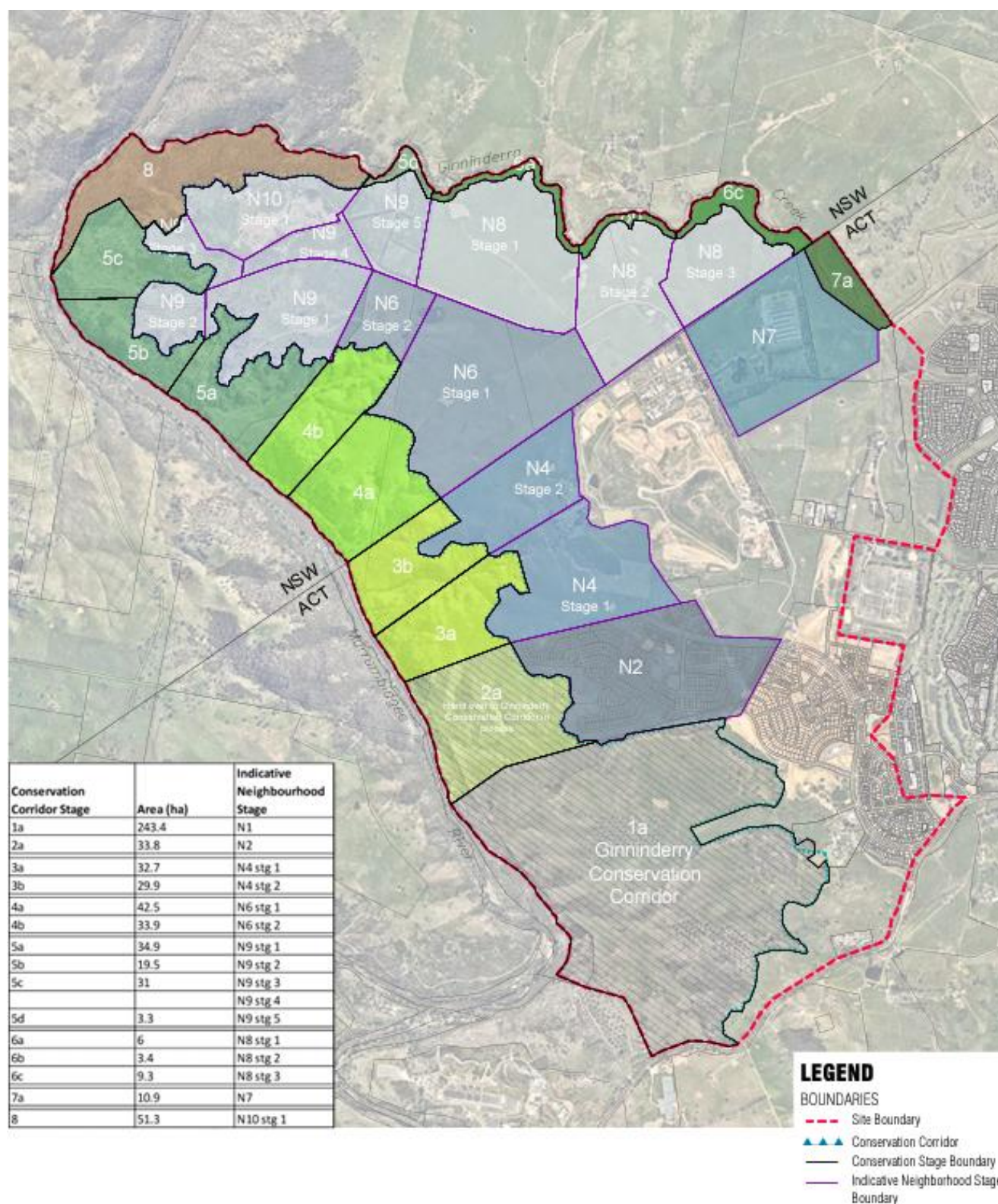
## 2.1 Development

The Ginninderry Project envisages the construction of an extensive urban area to accommodate a population of approximately 30,000 people, with development to be completed over a 40-year timeframe. The Ginninderry Project aims to deliver 300 dwellings to the market annually. The development approval of the Strathnairn Estate Development Plan (EDP) 1 (granted 31 July 2017) and EDP 2 (granted 18 March 2019) provides for a total of 818 residential blocks including single dwelling and multi-unit blocks.

The Annual Report 2021-2022 (Ginninderry, 2022) states that the next estate development to be delivered within Ginninderry is the suburb of Macnamara. The Macnamara development application sought approval over 39 multi-unit blocks and 664 single dwellings blocks. A partial approval of Macnamara EDP 1 was granted on 22 December 2021 to create 1 multi-unit block and 267 single dwellings blocks, while the remainder of blocks were considered within the partial refusal, due to current clearance zones imposed on the Ginninderry Project. Estate development works have commenced on Macnamara, in line with the partial approval.

Development approval was granted for the first stage of the Murrumbidgee Trunk Sewer on 21 May 2020 (DA20036796). When all three stages of the Murrumbidgee Trunk Sewer are completed, it will ultimately service over half of the future Ginninderry Project. A temporary sewer pump station will be installed as part of the Macnamara EDP 1 civil works. This will provide an interim sewer solution for the next 5 years and delay the need to build the Murrumbidgee Trunk Sewer. Works have not yet commenced on the Murrumbidgee Trunk Sewer.

The indicative staging for the development and the adjacent conservation corridor stages are detailed in **Figure 2.1**.



**Figure 2.1 Updated Conservation Corridor and Indicative Staging**



## 2.2 Conservation

The GCT was established in July 2019 in accordance with the Program Report. In the past five years (2017-2022) Riverview Projects and the GCT have delivered an array of projects implementing the *Ginninderry Conservation Corridor Management Plan 2018-2023* (GCC Management Plan) (TRC Tourism Ltd, 2018). GCT have utilised a combination of partnerships, direct procurement and staff engagement to undertake land management, conservation, monitoring and community engagement for the protection and enhancement of the natural and cultural values of the GCC.

The Program Report includes conservation commitments relevant to protected matters including:

- Golden sun moth (*Synemon plana*) (GSM), a vulnerable invertebrate (listed as critically endangered at the time of Program approval)
- White box-yellow box-Blakely's red gum grassy woodland and derived native grassland (BGW), a critically endangered ecological community
- Pink-tailed worm-lizard (*Aprasia parapulchella*) (PTWL), a vulnerable reptile
- Natural temperate grassland of the South Eastern Highlands (NTG), a critically endangered ecological community
- Threatened bird species.

The Program Report also includes a pathway, the Defined Process Strategy, and associated conservation outcomes to respond to any changes to infrastructure location within the GCC, where unidentified MNES are located.

### 2.2.1 Status of Conservation Commitments

The Program Report requires that the Program Review Report evaluate, review and summarise progress over the preceding five years in achieving the conservation commitments and outcomes as defined by the Program Report. The Audit Report completed in July 2022 (**Section 2.4**) specifically assessed compliance against each of the **29 conservation commitments**. These are included in full as **Appendix A**.

**Table 2.1** provides a summary of the conservation commitments for the Program Report. Those which have not yet been achieved, or have been completed in a non-compliant way, are discussed further.

**Table 2.1 Status of Conservation Commitments**

Status	Count	Conservation Commitment #	Comments	Refer to Section
Not yet started / Not applicable	2	8, 9	Requirement for GSM translocation not yet triggered.	<b>Section 2.2.5</b> <b>Section 3.1,</b> Overview #5



Status	Count	Conservation Commitment #	Comments	Refer to Section
Overdue	1	4	Conservation covenant for Lot 2 Wallaroo Road has not yet been implemented. The 2022 Audit <b>recommended a corrective action</b> , and discussion on this requirement is included in Program Review Report.	<b>Section 3.1</b> , Overview #5
Achieved	22	2, 3, 5, 7, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20, 22, 23, 24, 25, 26, 27, 28, 29	Key conservation achievements discussed in following sections.	<b>Sections 2.2.2 – 2.2.6.</b>
Achieved (but not within timeframe)	4	1, 6, 14, 21	<p>Timing non compliances:</p> <p>#1 – Surveys for pink-tailed worm lizard and natural temperate grassland were completed in 2018/19 and 2020 respectively, however these were not all within 12 months of endorsement of the Program (July 2017). As all surveys were completed and available publicly at the time of the 2022 Audit, <b>no corrective actions were recommended.</b></p> <p>#6, #14 and #21 – establishment of the Conservation Trust was established in line with Program Report, however the date of the trust deed was 4 days past the 2 year timeframe specified in the Program. <b>No corrective actions were recommended, as this was considered a minor non-compliance.</b></p>	<b>Appendix A</b>

## 2.2.2 Ginninderry Conservation Corridor Management

The GCC spans across the border of the ACT and NSW and is an integral part of the sustainable Ginninderry urban community. The GCC will comprise a total area of 580 hectares (ha) (360 ha in the ACT and 220 ha in NSW) when fully established. The GCC encompasses areas of habitat for the vulnerable PTWL and critically endangered BGW, as well as important riparian habitat.

The ACT Government has issued a Section 303 licence covering 242 ha of the GCC for the purposes of implementing the GCC Management Plan 2018-2023. According to the Program Report, control of the GCC will be transferred to the GCT in stages as development proceeds. GCT accepted the Section 303 licence in March 2020 and is responsible for approximately 1.5 km of Murrumbidgee River frontage and the adjacent land up-slope to the developing urban edge. The amount of land formally managed as part of the GCC is anticipated to grow through time, in line with the staging plan outlined in the Program Report.

Weed control has been a significant focus within the GCC for the protection and enhancement of BGW, NTG and PTWL habitat. Of the 242 ha currently under license for management, the GCT has treated more than half the area (128 ha, or 52% of the area) to control weeds, including African love grass (*Eragrostis curvula*), *Verbascum* spp., blackberry (*Rubus fruticosus aggregate*), tree of heaven (*Ailanthus altissima*) and willows (*Salix* spp.).

Other land management actions implemented under the Program's commitments include the development of a Bushfire Management Plan and biomass monitoring protocols. Monitoring of the GCT's strategic grazing program has demonstrated that biomass is being maintained at acceptable levels (a key consideration for the maintenance of grassland fauna habitat and flora diversity) with only 1 of 36 of biomass sampling locations indicating high biomass levels requiring intervention.

### 2.2.3 Box Gum Woodland

A total of 72 ha of EPBC listed BGW was identified in the Program Report as being present within the Ginninderry Project Area. This included approximately 3.8 ha of vegetation assumed to be BGW on the precautionary basis within the Drake Brockman Drive corridor, and 68.2 ha within the ACT section of the GCC. The Program Report committed to the avoidance of all BGW within the Ginninderry Project Area and its protection within the GCC. The variation of the Territory Plan in 2015 to rezone the GCC protected all of the 68.2 ha of the BGW identified within the conservation zone, as required by the Program Report. The GCC Management Plan (TRC Tourism Ltd 2018) contained additional provisions to enhance the quality of this woodland in the long term.

Capital Ecology was commissioned by the GCT in 2020 to assess and re-map the extent and condition of woody vegetation communities throughout the ACT portion of the GCC. The primary aim of this study was to accurately identify areas of EPBC Act and/or ACT *Nature Conservation Act 2014* (NC Act) listed BGW to inform monitoring, management and enhancement activities.

Through this process, it was determined that the GCC contained less EPBC listed BGW than was originally described in the Program Report. In total, 59.3 ha of BGW within the ACT portion of the GCC met the EPBC Act listing criteria for the ecological community, with an additional 14.0 ha meeting the listing criteria for NC Act BGW (which is generally of slightly lower quality), for a total of 73.3 ha of BGW ecological community within the conservation area (**Figure 2.2**).

While the strategic assessment identified up to 72 ha of EPBC Act BGW within the Ginninderry Project Area, the additional 14 ha of NC Act woodland will be managed for improvement with an aim to ultimately meet the EPBC condition thresholds.

Enhancement activities for the 14 ha NC Act woodland include:

- Supplementary placement of coarse woody debris
- Species enhancement plantings

The above actions are additional to the land management measures for BGW in the Ginninderry Development Offset Management Plan, which will further improve the condition of these areas of the ecological community.

### 2.2.4 Pink-Tailed Worm-Lizard

The Program Report committed that 146.4 ha of high-quality or 'suitable' PTWL habitat would be protected within the GCC.

In accordance with Condition 11 of the EPBC Act approval, reassessment of the quality and extent of PTWL habitat in the Ginninderry Project Area (both the GCC and the future urban area) was undertaken in 2019 by Capital Ecology.

Capital Ecology mapped a total of 188.3 ha of PTWL habitat, comprising 175.5 ha of suitable habitat and 12.8 ha of low-quality habitat within the Ginninderry Project Area (**Figure 2.3**). The Ginninderry Project has committed to retain and conserve 167.5 ha of the mapped PTWL habitat (161 ha of suitable PTWL habitat and 6.5 ha of low-quality PTWL habitat) within the GCC, which is 21.1 ha of suitable PTWL habitat more than originally committed in the Program Report.

The 2022 Ginninderry Annual Report reported that 125.6 ha of habitat has already been secured within the GCC to date.

### 2.2.5 Golden Sun Moth

The Strategic Assessment and Program Report identified that the proposed future extension of Ginninderra Drive would likely impact upon up to 1.8 ha of GSM habitat within the established offset areas of ‘Jarramlee’ and ‘West Macgregor’. To offset the impact on GSM to these conservation areas, the SLA purchased Lot 2 Wallaroo Road, NSW, as an advanced offset for GSM impacts and conservation reserve, as detailed in the Strategic Assessment and Program Report. This site contains 11.9 ha of GSM habitat, and 19.4 ha of potential GSM habitat. Habitat restoration is to commence prior to any construction of the Ginninderra Drive extension.

As the Ginninderra Drive extension is not yet scheduled for construction, no impacts to GSM have occurred, and the habitat restoration commitments defined by the Program Report have not yet been triggered. Lot 2 Wallaroo Road has not yet been rezoned under the Yass Valley Local Environmental Plan (LEP), nor has a conservation covenant requiring the long-term protection and enhancement of GSM habitat on the site been established.

The site is, however, captured under the Gooromon Grasslands Offset Management Plan (ACT Government, 2019), which provides an over-arching management plan for the three GSM offset reserves: Lot 2 Wallaroo Road, Jarramlee and West Macgregor. The Offset Plan was endorsed and approved by the ACT Government.

The GCT has separately engaged the Australian National University (ANU) to prepare a report on the status of GSM habitat within the site, and how to maintain and extend it. Research and trials of GSM larvae translocation will be conducted as part of the engagement with research and trials scheduled to occur in Spring/Summer 2022.

### 2.2.6 Natural Temperate Grassland

NTG was not initially identified within the GCC at the time of the preparation of the Strategic Assessment; however, the EPBC Act approval conditioned further survey work to be undertaken. Two separate technical studies were undertaken in 2017 (Robert Jessop Pty Ltd & SMEC 2017, SMEC 2017b) to meet the requirements of Condition 11 of the EPBC Act approval.

Following these surveys, the Department provided clarification regarding Condition 11 stating that the purpose of the condition was to capture any areas of NTG that were not identified in the original vegetation surveys undertaken during the preparation of the Program Report, following changes to the definition of the listed ecological community.

Capital Ecology (2020) resurveyed the Ginninderry Project Area and determined there was a total of 44.47 ha of grassland in the GCC which meets the EPBC Act listing criteria for NTG (**Figure 2.4**). Capital

Ecology (2020) highlighted that there was no NTG present within the urban development area and all 44.47 ha of identified NTG is being protected in the GCC.





## Natural temperate grassland restoration and pink-tailed worm-lizard habitat

Grassland restoration works have been undertaken in the Ginninderry Conservation Corridor, informed by expert advice (Conservation Outcome 22).

In April 2020, Greening Australia established a demonstration site using the ‘scrape and sow’ method. The process removed exotic grasses and their seed, removed nutrient-rich topsoil and provided a clean surface for native seed to establish. Mixed native grasses and forbs were sowed directly onto the scrape surface. This work increased the extent of natural temperate grasslands and pink-tailed worm-lizard habitat within the Conservation Corridor by 0.27 ha.

Rock, brick and woody debris were also added to the site to create artificial pink-tailed worm-lizard habitat.

Friends of Grasslands Community Group have undertaken regular monitoring at the site in November 2020, April 2021, October 2021 and October 2022.

Although no pink-tailed worm-lizards have been recorded within the artificial habitat, there is good ant activity, and the native vegetation continues to thrive.



**Pictures:** NTG restoration and pink-tailed worm-lizard habitat – Scrape and Sow site over time





**FIGURE 2.2**

EPBC Act and NC Act listed  
Box Gum Grassy Woodland

Image Source: ESRI Basemap (2023) Data source: NSW LPI (2023), NSW DSEI (2023), NPWS Estate (2023), Capital Ecology (2019)

**Figure 2.2 EPBC Act and NC Act listed Box Gum Grassy Woodland (Capital Ecology 2020)**



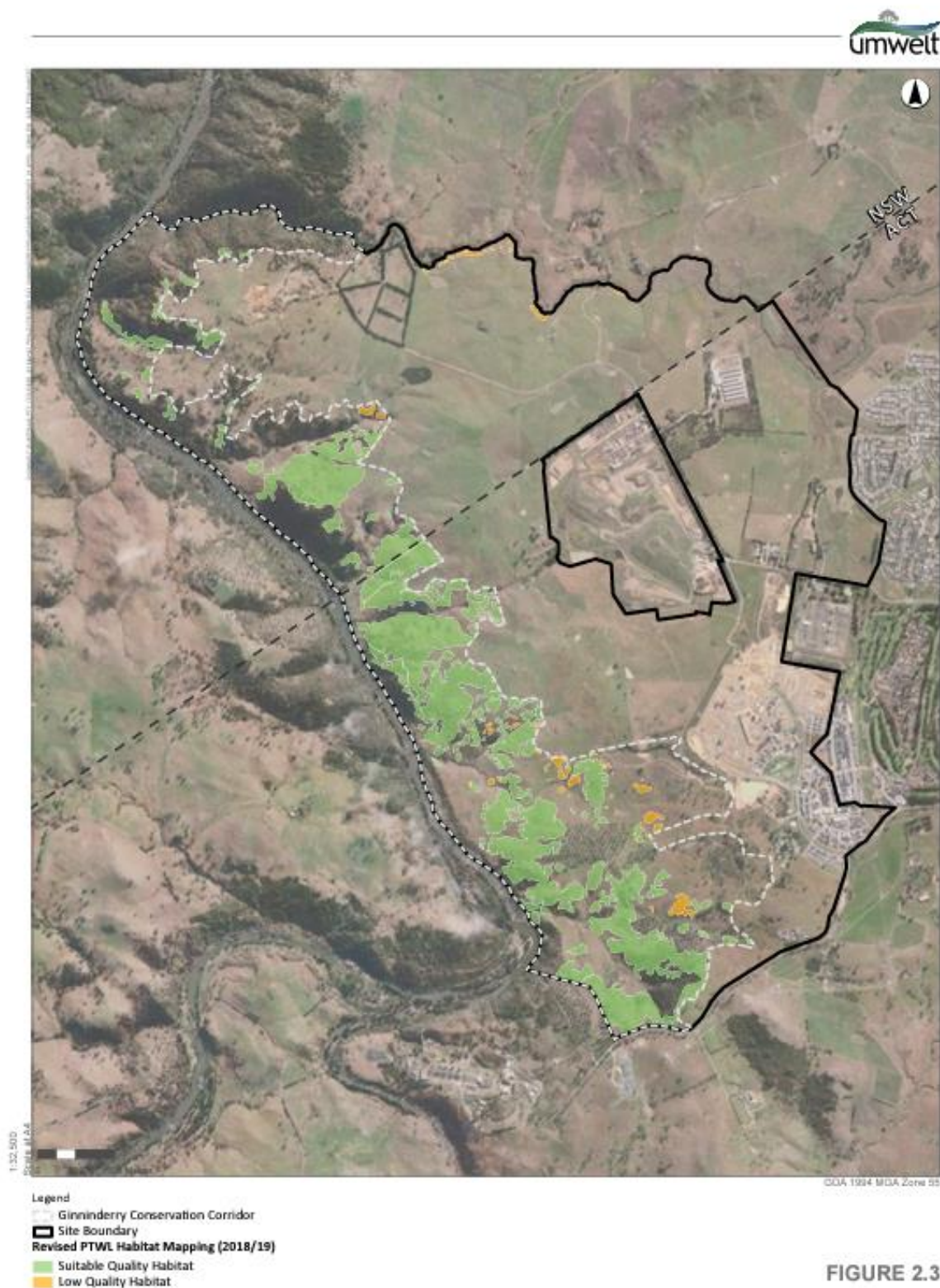
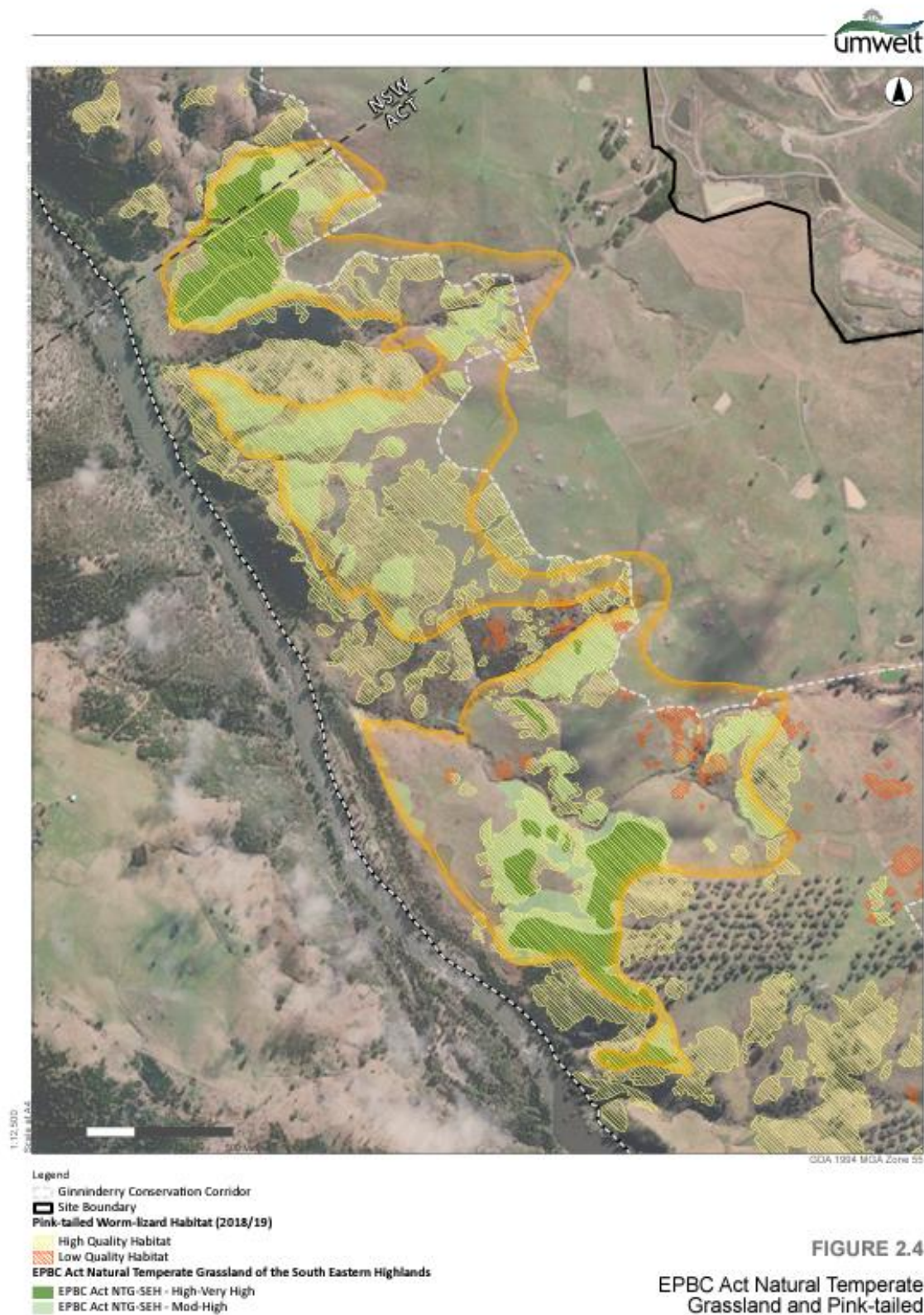


Image Source: ESRI Basemap (2023) Data source: NSW LPI (2023), NSW DPI (2023), NPWS Evaluate (2023), Capital Ecology (2019)

**Figure 2.3 PTWL Habitat in the Ginninderry Project Area (Capital Ecology 2019)**





**FIGURE 2.4**  
EPBC Act Natural Temperate  
Grassland and Pink-tailed  
Worm-lizard Habitat

**Figure 2.4 EPBC Act Natural Temperate Grassland and Pink-tailed Worm-lizard habitat (Capital Ecology 2020)**

## 2.3 Annual Reporting

Condition 16 of the EPBC Act approval specifies Annual Reporting requirements. An Annual Report addressing compliance with the conditions of the approval over the previous 12 months, including implementation of any management plans as specified in the conditions must be provided to the Department. The Annual Report must be submitted within two months of the end of each financial year after the commencement of the action.

The Ginninderry project team, on behalf of Riverview Projects, has prepared and submitted three Annual Reports to the Department since the action commenced in August 2019:

- Annual Report 2019-2020 Ginninderry Project (Ginninderry 2020)
- Annual Report 2020-2021 Ginninderry Project (Ginninderry 2021)
- Annual Report 2021-2022 Ginninderry Project (Ginninderry 2022).

The Annual Reports have been prepared in accordance with the requirements outlined in Section 7.1.1 of the Program Report. To date, they have reported on:

- Commitments related to establishing and managing the GCC (including BGW, PTWL and NTG offset commitments)
- Cat containment in the Ginninderry urban area
- Establishment of an offset area for GSM.

All Annual Reports are publicly available on the Ginninderry website, Reports Library, Environmental Management and Compliance, available at <https://ginninderry.com/resource-centre/reports-library/>.

## 2.4 Independent Audit

Condition 18 of the EPBC Act approval specifies the requirement for an Independent Audit Review Report every five years or upon direction of the Minister. The GCT engaged Umwelt to undertake a compliance audit which was submitted to the Department on 14 July 2022.

The Audit Report reviewed the two preceding Annual Reports, as well as original data sources, and found that Riverview Projects is compliant with the majority of conditions under EPBC SA024.

Non-compliances were identified against four EPBC approval conditions and four conservation outcomes (refer **Section 2.2.1**). Two non-compliances were of an administrative nature (with regard to timing) and no recommendations were provided. Recommendations were made to address other non-compliances, with additional recommendations identified as opportunities for improvement in future annual reporting to clearly demonstrate compliance with all requirements.

A letter received from the Department on 23 August 2022 confirmed that the Audit Report is consistent with the requirements set out in the Program Report.

The Audit Report is publicly available on the Ginninderry website Reports Library, available at [https://ginninderry.com/wp-content/uploads/2022/08/22334\\_R01\\_West-Belconnen-Strategic-Assessment-Compliance-Audit\\_V3.pdf](https://ginninderry.com/wp-content/uploads/2022/08/22334_R01_West-Belconnen-Strategic-Assessment-Compliance-Audit_V3.pdf).

**Table 2.2 Non-Compliances identified in 2022 Audit**

EPBC Condition	Comments	Corrective Action
Condition 3 - The approval holder must ensure that the conservation outcomes specified in Section 5 of the Program are achieved	See <b>Table 2.1</b> .	See <b>Table 2.1</b> .
Condition 5 – Within six months prior to the commencement of construction in the ACT portion of the site, the land within the ACT portion of the West Belconnen Conservation Corridor boundary is to be either rezoned as outlined in Section 3.6 of the Program or must be secured for conservation in perpetuity through a legally binding mechanism approved by the Department. For the NSW portion of the West Belconnen Conservation Corridor the approval holder must secure the land for conservation in perpetuity through a legally binding mechanism approved by the Department within two years of endorsement of the Program. The West Belconnen Conservation Corridor Reserve Management Plan of condition 8 will not be endorsed and approved until the land has been rezoned or secured.	The Audit found Riverview Projects non-compliant with this condition as a legally binding mechanism to secure the land in perpetuity for conservation has not been secured over the NSW land.	This is discussed as ‘Key Challenge 2’ in <b>Section 3.2</b> .  Riverview Projects are continuing discussions with the Department as to the appropriate mechanism to meet this condition.
Condition 6 –The approval holder must ensure the Environment Management Trust is established through a trust deed in accordance with the endorsed Program within two years from the date of endorsement of the Program and prior to commencement of construction (in all areas other than the area marked as stage 1 in Figure 4 of the Program Report).	Establishment of the Conservation Trust was established in line with Program Report, however the date of the trust deed was 4 days past the 2 year timeframe specified in the Program.	No corrective actions were recommended, as this was considered a minor non-compliance.
Condition 20 – Unless otherwise agreed to in writing by the Minister, the approval holder must publish all -management plans and reports referred to in these conditions of approval on their website. Each management plan and report must be published on the website within 1 month of being endorsed and approved.	The Audit found that while all management plans and reports required by the conditions of approval are able to be accessed on the Ginninderry website, the majority of them were published more than 1 month after being endorsed and approved.	Riverview Projects have been made aware of non-compliance, and are working towards more timely publishing going forward, noting challenges with agency review as discussed as ‘Key Challenge 6’.

## 3.0 Review of Implementation

### 3.1 Overview and Successes

The Ginninderry vision, ‘Creating a sustainable community of international significance in the Capital Region’ is central to Riverview Projects’ success in delivering conservation outcomes. Having achieved and maintained a 6-Star Green Star Communities rating, the Ginninderry development continues to embrace community values, including a healthy environment and sustainable living.

The Annual Reports and Independent Audit have reported on the status of each conservation outcome and key commitments from the Program Report. These are summarised in **Appendix A**. The majority of conservation outcomes have been achieved, implemented or are on track for implementation in accordance with the Program Report, noting that the Ginninderry Project is in the early stages of its 20-year timeframe and some conservation outcomes cannot yet be evaluated. As the Program Review Report aims to focus on the implementation of the Program, key highlights and successes have been extracted and discussed below.

***1. Protection of MNES that are identified in pre-construction surveys for permitted construction work in the WBCC (Conservation Outcome 1)***

Surveys were undertaken for PTWL in 2018-19 by Capital Ecology as discussed in **Section 2.2.4**, with an additional 35.7 ha of suitable PTWL habitat identified within the GCC and future urban area. The Ginninderry Project is now committed to retaining and conserving 167.5 ha of PTWL habitat (161.0 ha of suitable habitat and 6.5 ha of low-quality habitat), which is **21.1 ha more suitable habitat** than was stated in the Program Report (**Figure 2.3**).

Capital Ecology (2020) also resurveyed the Ginninderry Project Area and determined there was a total of 44.47 ha of grassland in the GCC which met the revised EPBC Act listing criteria for NTG (**Figure 2.4**). The Capital Ecology 2020 work highlighted that there was no NTG in the urban development area and **all 44.47 ha of identified NTG is being protected** in the GCC.

The completion of pre-construction surveys for both these MNES has resulted in identifying more habitat than initially assessed and ensures that conservation actions can be effectively targeted.

Surveys for threatened flora and fauna were undertaken prior to construction as described in **Section 2.2**, but not within 12 months of ministerial approval (Conservation Outcome 1). Although this was a non-compliance with the timing of the condition, the intention of the condition was met, and no new MNES were identified.



**2. Establishment of a governance regime for reserve land (Macgregor, Jarramlee and Lot 2) (Conservation Outcome 6) and establishment of a land management governance regime (Conservation Outcome 21)**

The **Ginninderry Conservation Trust (GCT)** was established in 2019 as a strategic initiative of the Ginninderry Joint Venture, with responsibility for the management of the GCC, delivery of EPBC Act commitments within the GCC, harnessing community support for landscape management and presenting a contemporary leading practice conservation space (Conservation Outcomes 6 and 21). The GCT is the entity responsible for meeting the EPBC approval conditions of the 'Environmental Management Trust'. The GCC's vision is as follows:



The Ginninderry Conservation Corridor is an integral part of sustainable living at Ginninderry.

- The community and visitors respect and are inspired by the intrinsic value of the area's biodiversity, ecological integrity, scenic landscape, cultural heritage and tranquil natural settings.
- The Corridor showcases leadership in science-based biodiversity restoration, innovative community management, sustainable recreation and active learning opportunities and partnerships.

The GCT was established prior to construction commencing, albeit 4 days outside the required timeframe in the Program Report (Conservation Outcomes 6, 14 and 21). While a non-compliance, no corrective action was required to rectify this, due to the minor nature of the delay. The GCT works closely with the Ginninderry Project team and is primarily responsible for implementing the Plan of Management for the GCC. The GCT prepares and publishes separate annual reports reporting on achievement of conservation commitments within the GCC (<https://www.ginninderry.org/publications>).

The governance and management of reserve land (Macgregor, Jarramlee and Lot 2 Wallaroo Road) is provided for in the **Gooromon Grasslands Offset Management Plan 2018-23**.

### 3. Establishment of a process of independent third-party review of the Reserve Management Plan (RMP) (Conservation Outcomes 11, 18 and 25)

**Annual Reports** have been prepared by Riverview Projects and the GCT since construction commenced which address MNES outcomes achieved during the previous year, as well as lessons learned (Conservation Outcomes 11, 18 and 25). Riverview Projects has received feedback from the Department each year regarding the content and quality of the Annual Reports and has incorporated this feedback to improve subsequent reporting. The GCT Annual Reports document progress against the 7 key program areas funded by the ACT Government.

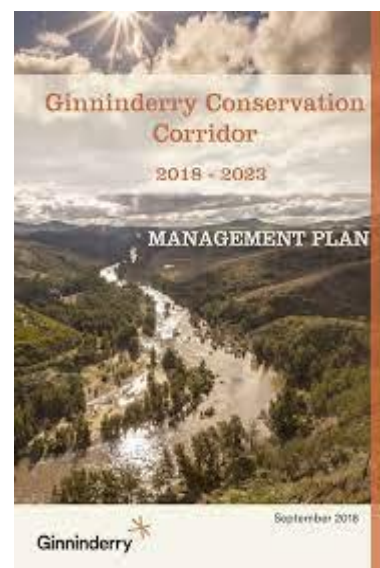


### 4. Preservation and enhancement of woodland habitats (Conservation Outcome 13) and preservation and enhancement of PTWL habitats (Conservation Outcome 20).

The GCT is responsible for management of the GCC. Preservation and enhancement of habitat is undertaken in accordance with the relevant management plans.

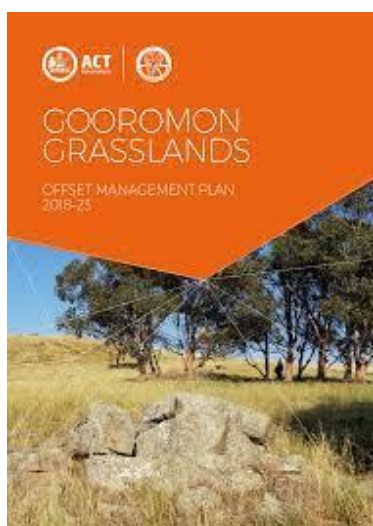
The **Ginninderry Conservation Corridor Reserve Interim Management Plan 2018 - 2023** was endorsed by the ACT Conservator of Flora and Fauna on 19 November 2018 and approved by the ACT Minister for the Environment on 3 January 2019 (Conservation Outcomes 13 and 20). Activities in the GCC are being managed in accordance with this plan under the guidance of the GCT.

When the broader **Murrumbidgee River Corridor Plan of Management** (administered by the ACT Government) is updated, the approved GCCMP will be recognised and upgraded to a statutory plan consistent with the rest of the Murrumbidgee River Corridor Plan. As this process is administered by the ACT Government, timing is beyond the control of Riverview Projects.



## 5. Mitigation of the impact of Ginninderra Drive extension on GSM habitat in Jarramlee and West Macgregor offset areas (Conservation Outcomes 3, 4 and 5)

The **Gooromon Grasslands Offset Management Plan 2018-23** provides an overarching management plan for the three GSM offset reserves at Jarramlee, West Macgregor and Lot 2 Wallaroo Road (Conservation Outcome 5). It is being implemented by the ACT Government.



A **conservation covenant over Lot 2 Wallaroo Road** is yet to be progressed, resulting in Conservation Outcome 4 not being achieved to date. The timing for this outcome in the Program Report required concurrent implementation with the Yass Valley LEP amendment (which has already occurred). However, as the requirement for the conservation outcome is linked to the extension of Ginninderra Drive, which has not yet commenced, the driver for implementation of this outcome has not occurred.

**Translocation of GSM larvae** prior to construction of the Ginninderra Drive extension (Conservation Outcomes 8 and 9) has also not occurred and is not applicable at this point in time, as construction of the Ginninderra Drive extension is not expected to commence for another 15-20 years. However, as discussed in **Section 2.2.5**, GSM translocation trials are occurring on Lot 2 Wallaroo Road.

## 6. Protect habitat from domestic predators (Conservation Outcome 16) and PTWL protected from domestic predators (Conservation Outcome 23)

**Cat containment** has been declared by the ACT Government for the suburbs of Strathnairn and Macnamara as a response to this Conservation Outcome. As development progresses, cat containment will continue to be declared, including in NSW as applicable (Conservation Outcomes 16 and 23).

The cat containment policy has been implemented through ACT legislation (the *Domestic Animals Act 2000*) for the suburbs of Strathnairn and Macnamara, with enforcement by ACT Domestic Animal Services. As Riverview Projects has no legal standing to enforce cat containment compliance, the Project Team have focussed on community education, and communication of cat containment requirements has been met with a positive response from the community. The Conservation Outcome being mandated through legislation is the most effective approach for ensuring implementation and compliance.



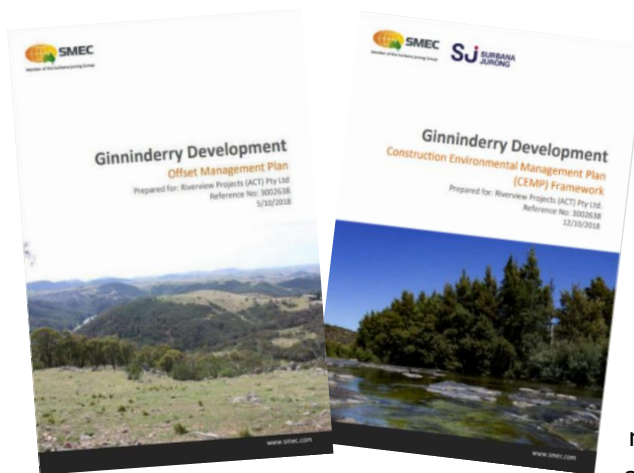
**Dogs are prohibited from entering the Conservation Corridor** with signage installed around the GCC. Information has been provided to residents and published on the Ginninderry website. GCT staff patrol regularly and enforce the dog ban (Conservation Outcomes 16 and 23).



**7. Maintenance and enhancement of connectivity between box gum woodland and PTWL habitat areas. No appreciable long term net reduction in total box gum woodland or PTWL habitat areas (Conservation Outcomes 15 and 22)**

All works that impact BGW and PTWL are informed by relevant expert advice and are guided by the **Ginninderry Development Offset Management Plan** and the **Ginninderry Development Construction Environmental Management Plan Framework** (Conservation Outcomes 15 and 22). As discussed in **Section 2.2.4**, an additional 35.7 ha of PTWL habitat was mapped by Capital Ecology in 2019 within the GCC and urban area. The Ginninderry Project is now committed to retaining and conserving 167.5 ha of PTWL habitat, in excess of the 146.4 ha that was stated in the Program Report (Figure 2.3).

Conversely, updated mapping of BGW in the GCC by Capital Ecology determined that there was only



59.3 ha of BGW that meets the EPBC Act listing criteria instead of 72 ha that was identified in the Program Report. While an additional 14 ha of BGW that meets the NC Act listing criteria was identified, this needs to be enhanced to meet the condition criteria of the EPBC Act listed ecological community. GCT is committed to enhancing this 14 ha (as described in **Section 2.2.3**).

Despite minor differences in the quantum of MNES mapped, the intention of the Program Report is being met, with all MNES within the GCC being protected and managed in perpetuity.

**8. Implementation of assessment process for additional unanticipated impacts to any area dominated by native grasses which includes high or moderate quality PTWL habitat (Conservation Outcome 27) and unanticipated impacts to MNES within the Project Area due to major changes to infrastructure location (e.g. sewer alignment) (Conservation Outcome 28)**

The Program Report included a **Defined Process Strategy (DPS)** to manage any unanticipated impacts to MNES resulting from the placement of key infrastructure. The DPS is a critical component in the implementation of the Program, allowing flexibility and adaptive management over the 20-year life.

The Program Report recognised that the scale and timeframe of the program was such that identification of all actions was not practical, and instead provided general principles for urban development and conservation at Ginninderry, with the DPS providing a method to assess infrastructure works that were not identified in the Strategic Assessment, without requiring standalone EPBC Act approval.

However, implementation of the DPS has proved to be a challenge throughout the first few years of the Ginninderry Project, with inconsistent understanding of its scope, and expectations for its application, resulting in it being expected for all infrastructure construction within the GCC. This did not provide the efficiencies that it was intended to provide. Riverview Projects sought advice from Capital Ecology (2022) to

gain expert advice and clarity on the intent and implementation requirements of the DPS for the Ginninderry Project. According to the advice from Capital Ecology, the DPS is to be implemented only for a proposal which will result in an additional impact that is not already described in the Program Report, and it is the responsibility of the approval holder (Riverview Projects) to make a reasonable determination (self-assessment) as to whether the DPS is to be implemented for a particular proposal.

This review and advice has provided Riverview Projects and the GCT with clarity on the application of the DPS, and confirmed that it had been applied in scenarios it was not required (i.e. the construction of the Strathnairn Residents Track). Riverview Projects communicated this oversight to the Department in the 2021-22 Annual Report, and as captured in the 2021-22 Annual Report, it was considered that the Defined Process Strategy has not been triggered in the Ginninderry Project.

Consultation with the Department is continuing on the appropriate application of the DPS, and is discussed further in Key Challenge #3 below.

## 3.2 Key Challenges

Over the first five years of the Ginninderry Project, the Program Report has generally been implemented in accordance with how it was written and intended. Nevertheless, with any assessment and approval of this scale and complexity, issues arise in practical implementation of actions on ground, interpretation of requirements, and navigating the inherent inflexibility of ‘point in time’ approval conditions.

The intention of this Program Review Report is to identify these key implementation issues and seek to find solutions within the scope of approval.

### *Key Challenge 1: Timing of Conservation Area Delivery*

The Program Report and EPBC Act approval do not fully consider the implications of staged development, with the requirement to establish the GCC prior to construction occurring.

As land release sales are the funding source for conservation actions in the GCC, the GCC in its entirety cannot be established up front as Riverview Projects does not have the required funds to acquire land, or to appropriately manage the area.

The Program Report states that transfer of the GCC land to the GCT will be ‘timed to precede any construction on adjacent development zones occurring that would affect the catchment or catchments contained within each transfer stage area’.

This commitment implies staged establishment of the GCC, however the wording requires clarity. The GCC was established prior to construction commencing at Ginninderry, consistent with the Program Report; however, the ongoing acquisition of private leases which form the future conservation corridor needs to align with future development stages. The management of the ultimate extent of the conservation corridor without the accompanying funding from development would result in sub-optimal management and environmental outcomes, and not meet the intention of the Program Report.

An updated staging plan has been developed since the finalisation of the Program Report (**Figure 2.1**) which details the proposed stages for development and the correlating segments of the GCC. Riverview Projects has provided the updated staging plan to the Department and seeks acknowledgement of the staging plan where areas of the GCC are established and transferred to GCT triggered by sufficient land sales. Moving

forward **Riverview Projects** will submit a staging plan with the Annual Report to the Department, as the Department recognises development is ever changing.

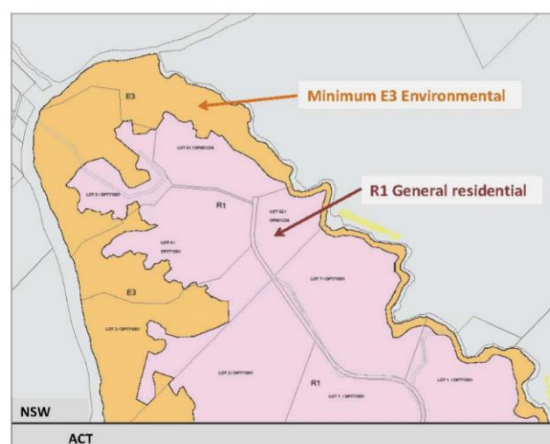
## Key Challenge 2: Securing Land for Conservation

### Conservation Zoning in NSW

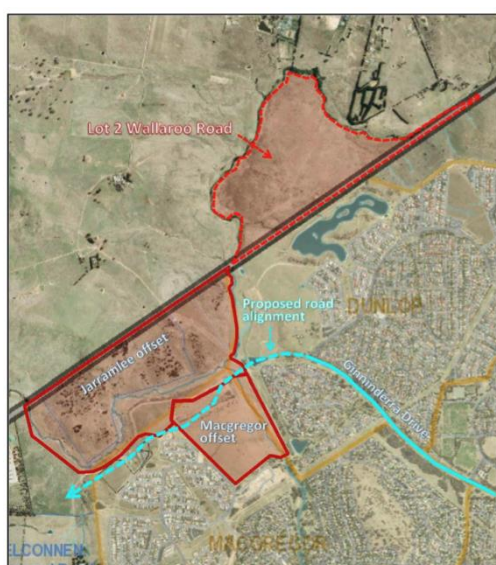
Condition 5 of the approval states *‘the approval holder must secure the land for conservation in perpetuity through a legally binding mechanism approved by the Department...’*. The independent audit (Umwelt, 2022) considered that the rezoning of this land under Yass Valley LEP (Parkwood) 2020 as C2 Environmental Conservation Zoning and C3 Environmental Management did not meet the exact requirements of this condition, as a LEP can be rezoned by Local Council, and therefore is not adequate to secure the site ‘in perpetuity’.

It is however recognised that any rezoning of the environmental land would require both local council and NSW Planning Consent making the rezoning highly unlikely.

Following detailed review of the Program Report, it is found to specify that a **‘minimum E3 Environmental’<sup>1</sup> zoning** [now referred to as Zone C3 Environmental Management, as amended December 2021] **be applied over the NSW part of the GCC**. With consideration of this, Riverview Projects has met the intent of the Program Report and therefore it could be deemed to have met Condition 5.



It is recommended that the **Commonwealth consider the advice** provided by the Riverview Projects currently before them **and confirm that Condition 5 can be varied** in accordance with that advice, thereby allowing future compliance with Condition 5.



### Lot 2 Wallaroo Road

Lot 2 Wallaroo Road, NSW was **purchased by the SLA as an offset for impacts to GSM habitat** as a result of the future Ginninderra Drive extension. The land purchase was completed in accordance with the Program Report and Condition 7 of the approval, in advance of any impact to GSM habitat occurring.

The Program Report specifies that management for restoration of habitat for GSM does not need to occur until prior to the commencement of construction of Ginninderra Drive extension, therefore Riverview Projects is compliant with this commitment.

Throughout the Program Report and the conditions of approval, Lot 2 Wallaroo Road is proposed to form part of the GSM

<sup>1</sup> Yass Valley Local Environmental Plan 2013 was amended in December 2021, with changes to the naming conventions for Zones E1 to E4, renaming them C1 to C4. No changes were made to the objectives, permissible uses (with or without consent) or prohibited uses.

conservation reserves in its entirety. The conditions of approval define the conservation reserves as ‘*Golden Sun Moth Conservation Reserves: This includes Jarramlee [sic] (52 ha), West Macgregor (37 ha) and Lot 2 Wallaroo Road (86.8 ha) as shown in Figure 14 of the Program - Urban Development at West Belconnen (AT Adams Consulting, April 2017)*’.

In accordance with Condition 9 of the approval, **Lot 2 Wallaroo Road was incorporated into the Gooromon Grasslands Offset Management Plan** (ACT Government 2019) alongside the two established offsets (Jarramlee and West Macgregor).

However, as a result of combining the three offset sites into one management plan, the governance of the Lot 2 Wallaroo Road offset site and associated obligations for Riverview Projects, GCT and ACT Government lacks clarity. Further, while compliant with the approval conditions, without active management of the site, conservation values have the potential to decline.

**Table 6, Section 8 of the Program Report** describes the proposed **arrangements for funding** for the conservation reserves. This clearly provides the breakdown of responsibilities for funding in terms of establishment costs and funding in perpetuity for management of these sites. It is recommended that **Riverview Projects continues to engage with the ACT Government** regarding the ACT Government meeting its obligations for funding the conservation reserves as agreed and seeks agreement on the establishment funding required for Lot 2 Wallaroo Road.

**Action 4, Section 5 of the Program Report** requires the application of a ‘*conservation covenant requiring the long term protection and enhancement of GSM habitat on Lot 2 Wallaroo Road... [and] further investigations should occur for the potential to rezone the land to E3 [now C3 Environmental Management, as amended December 2021] Environmental Management*’.

Riverview Projects has focused on the second part of the required action and undertaken investigations for the potential to rezone the land; however, Riverview Projects is unable to proceed as they are not the landowner, and **it is outside Riverview Project’s ability to rezone Lot 2 Wallaroo Road** on behalf of the SLA.

The 2022 Audit Report determined that as Lot 2 Wallaroo Road does not have a conservation covenant, this action was deemed non-compliant. It is recommended that **Riverview Projects should progress the conservation covenant** for Lot 2 Wallaroo Road to clearly establish their land management responsibilities for the offset site.

The scope of the **conservation covenant is limited to protection and enhancement of GSM habitat** on Lot 2 Wallaroo Road. As such, while the **covenant would cover the entire 86.8 ha** site, the **management actions** would only be applied to the portion of land for GSM habitat protection and restoration, which is **33.1 ha** (11.9 ha of GSM habitat, and 19.4 ha of potential GSM habitat).

While future impacts to GSM habitat arising from Ginninderra Drive extension will not occur for the short to medium term, a conservation covenant on Lot 2 Wallaroo Road specifically identifying the required GSM habitat restoration area would provide clear direction and guidance for the ongoing management and governance of Lot 2 Wallaroo Road, separate to the responsibilities of the ACT Government, and contribute to ensuring no decline in ecological value.



### **Key Challenge 3: Interpretation of the Defined Process Strategy**

As discussed in **Section 3**, the DPS was intended to be implemented in the event that infrastructure is required that was not foreseen at the time of the Strategic Assessment. To better understand their obligations under the Program Report and EPBC Act approval, Riverview Projects sought advice from Capital Ecology (2022) regarding the implementation of the DPS for the Ginninderry Project. This advice considered the **intent** behind the inclusion of the DPS in the Program Report, and was discussed in the 2021-2022 Annual Report.

Since this advice, Riverview has been proactively engaging with the Department in an attempt to clarify confusion around the DPS. Through this Program Review Report process, it has come to Riverview Project's attention that the DPS advice provided in the previous reporting year is not accepted by the Department. Riverview Projects and the Department are continuing to work collaboratively to find clarity around the application of the DPS.

In a meeting on 20 June 2023, it was identified that further work is required prior to the Department coming to an agreed position on the DPS. Therefore, it is not appropriate for this report to detail the application of the DPS for specific projects.

The below dot points step out the actionable items and next steps:

- The Department and Riverview Projects continue to work together to get to an agreed position aiming for the third quarter of 2023
- The action item in Quarter 3 or Quarter 4 for the Department's Delegate to sign off on an agreed DPS process
- First Quarter 2024 receipt of the Department's Delegate sign off, on an agreed DPS position
- DPS position and clarification included in the 2023-2024 Annual Report.

### **Key Challenge 4: Incorporating updated information**

Given the duration of the approval, it is likely that threatened ecological communities and species considered within the Strategic Assessment will change listing status throughout the life of the Program.

Section 7.4 of the Program Report 'Dealing with Uncertainty' raises the risk of new species listings and species de-listings throughout the life of the Program and states the Adaptive Management Framework will provide scope for these matters to be addressed.



A key consideration is GSM, whose listing status was downgraded from critically endangered to vulnerable in 2021. No conservation covenant, nor habitat restoration has yet occurred on Lot 2 Wallaroo Road; and the habitat which was purchased while the species was critically endangered is now expected to be experiencing a lower threat of loss. This will impact commitments going forward in terms of the considerations of the conservation covenant; and should additional or unforeseen impacts to GSM

occur during the future course of the Program, the up-to-date listing of the species should be considered.

Riverview Projects will review the Program Report's requirements for an **Adaptive Management Framework**, particularly in relation to species listings and implications for offsets. The **mechanism for flexibility** is inbuilt in the Program Report; however, a method for implementing this flexibility has not been developed. This process should be undertaken in discussion with the Department.

### Key Challenge 5: Changes to the ACT / NSW Border

In September 2022, news articles stated that the NSW Premier and ACT Chief Minister had begun discussions for a potential change in the ACT/NSW border at Parkwood. This land makes up the NSW portion of the Ginninderry Project Area for Ginninderry and is currently only accessible from the ACT. This would be the first change to the border between NSW and ACT since 1911. There has been no confirmation regarding this change or its timing, however it is anticipated that realisation of any change to the border is likely to be prolonged. Due to the different land tenure arrangements currently in place across the two jurisdictions, any change to the borders would have implications on the strategic assessment and the Program Report.

Given there is no confirmation or agreed timeframe to implement any change to state borders, it is recommended that **Riverview Projects maintains awareness of different jurisdictional requirements, continues to implement the Program as approved, and considers the implications to changes as the need arises.**



### Key Challenge 6: Administrative

EPBC Conditions 17 and 18 require NSW Office of Environment and Heritage and the ACT Conservator of Flora and Fauna to be consulted, to review or to endorse various aspects of the reporting.

During the independent audit process, the above entities advised they were not able to endorse consultants or provide a response to such consultation.

Further, requiring these agencies to review or endorse the Program Review Report (this report) and meet the required timeframes is not possible. The Program Review Report is required to be completed within 5 years and 6 months of the date of endorsement of the Program. This in itself is difficult to achieve given the sequencing of reports, with the Program Review Report dependent on the publishing of both the Annual Report and the Independent Audit. Providing sufficient time for agency review and endorsement in the sequence stated would extend beyond the timeframe given in the conditions of approval.

The conditions of approval relevant to reporting are described in **Table 3.1** below, highlighting the responsibilities for external review and endorsement.

**Table 3.1 Review and Endorsement Conditions**

EPBC Condition	Responsibilities				To be made publicly available?	Timing	Recommended Changes
	GCT	NSW OEH	ACT Conservator	Department			
Condition 16 Annual Report	-	-	-	Submit	Yes	Annually, 31 August	Nil
Condition 17 Program Review Report	-	Review	Endorse	Submit	Yes	18 January 2023, then every 5 years	Remove condition to seek review and endorsement from state/territory agencies.
Condition 18 Independent Audit	Appoint Auditor	Consulted in choice of Auditor		Submit	Yes	18 July 2022, then every 5 years	Remove condition to seek approval from state/territory agencies in appointment of independent auditor.

Based on these challenges, it is recommended that the **Department consider removing the requirement for state agency input** in the independent auditor selection and Program Review Report process.



## 4.0 Recommendations

The EPBC Act does not contain a mechanism for varying an approved Program, however the EPBC conditions may be amended. The Program Report intended to build flexibility into its commitments through discussion of an Adaptive Management Framework and a DPS (intended to allow the self-assessment of minor changes to the Program throughout its 20-year life), however the wording of the Program Report limits the effectiveness of these mechanisms in some applications.

The intention of the Program Report was that these two mechanisms would allow for the incorporation of up-to-date information, respond to change, and ensure the best environmental outcomes are achieved.

Based on this Program Review Report, reflecting on the first five years of Program implementation, the key issues for implementation of the Program are related to:

- 1) the interpretation of requirements around the DPS, requiring Riverview Projects to reassess activities that were already approved as part of the class of actions in the endorsed and approved Program Report
- 2) the requirement to establish conservation areas in advance of development areas, when the endorsed and approved Program Report clearly describes the relationship between development staging and funding for conservation
- 3) the wording in the conditions of approval requiring a level of security over NSW land that cannot be achieved through the mechanism defined in the endorsed and approved Program Report
- 4) the requirement for reporting to be reviewed and endorsed by state/territory agencies that results in ongoing timing and compliance issues.

To rectify these implementation issues, and allow ongoing compliance, Riverview Projects continues to engage with the Department and seeks endorsement on the following:

- 1) clarity on the implementation and application of the DPS, including a reduced expectation to engage with the Department on activities already included within the approved class of actions
- 2) provision of an updated staging plan annually, which shows the GCC being established in line with development areas and land sales
- 3) that a C2 Environmental Conservation Zoning is appropriate at this point in time to secure the land for conservation for the NSW portion of the GCC, given the Program Report specifies this approach and Condition 5 allows the Department to make that determination
- 4) amendment of EPBC condition 17 to remove the requirement for the Program Review Report to be submitted to the NSW Office of Environment and Heritage for review and submitted to the ACT Conservator of Flora and Fauna for endorsement.  
*Suggested change: The Program Review Report will be submitted to the Department.*
- 5) amendment of EPBC condition 18 to remove the requirement for the Environmental Management Trust to consult with the ACT Conservator of Flora and Fauna and NSW Office of Environment and Heritage in appointing an independent auditor.

*Suggested change: The GCT will appoint an independent auditor, and submit the audit to the Department.*

The guidance provided by the Department on the format of future Program Review Reports has also been acknowledged, and will be used to guide the preparation of the next report in 5 years.

## 5.0 References

ACT Government, 2019, *Gooromon Grasslands Offset Management Plan 2018-23*, Australian Capital Territory, Canberra.

A T Adams Consulting 2017, *Urban Development at West Belconnen Program Report*, prepared for Riverview Projects (ACT) Pty Ltd.

Ginninderry 2020, *Annual Report 2019-2020 Ginninderry Project*, prepared for the Australian Government.

Ginninderry 2021, *Annual Report 2020-2021 Ginninderry Project*, prepared for the Australian Government.

Ginninderry 2022, *Annual Report 2021-2022 Ginninderry Project*, prepared for the Australian Government.

Ginninderry Conservation Trust 2020, *Ginninderry Conservation Trust Annual Report 2019-2020*, prepared for the ACT Government.

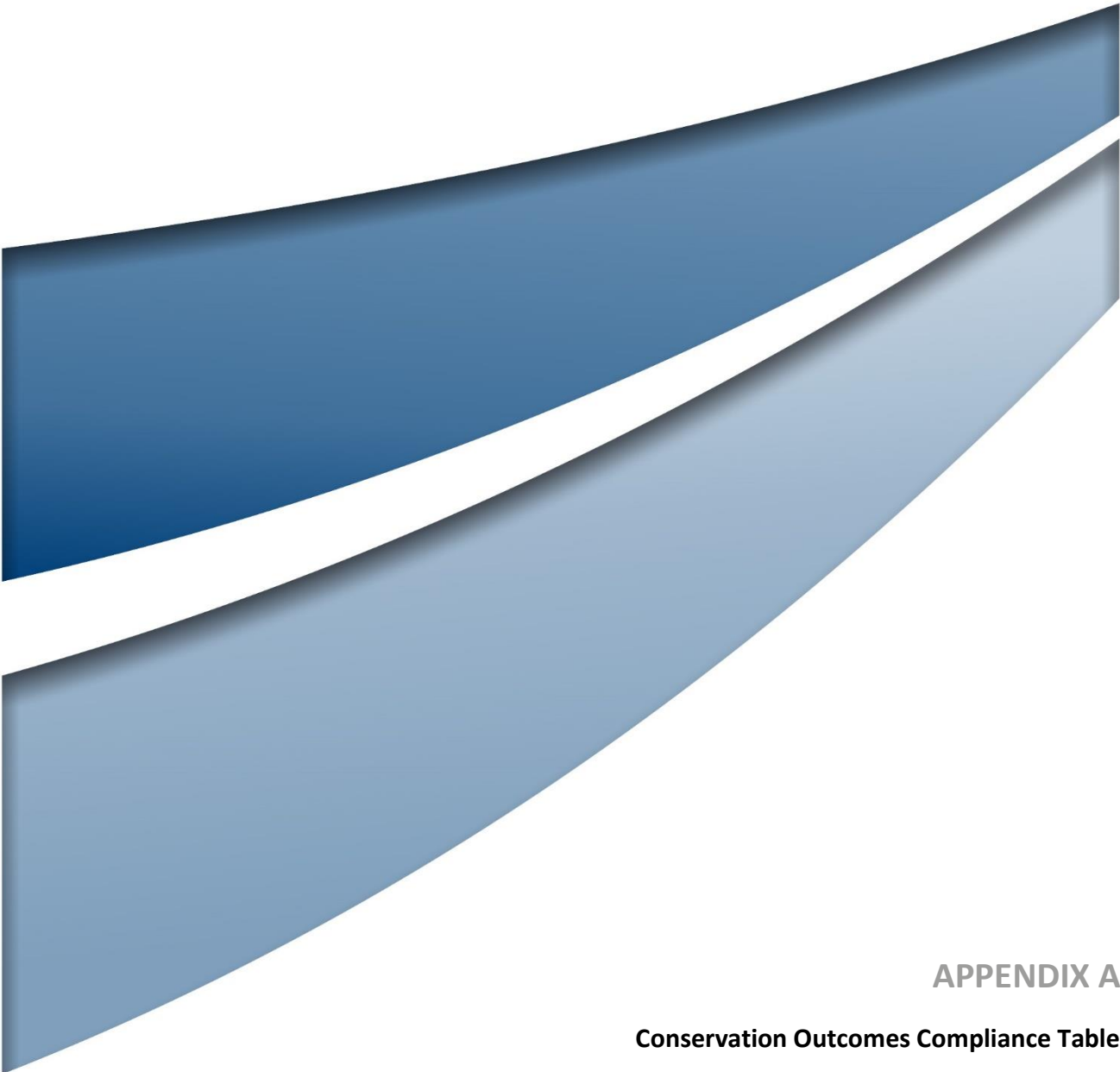
Ginninderry Conservation Trust 2021, *Ginninderry Conservation Trust Annual Report FY20/21*, prepared for the ACT Government.

Ginninderry Conservation Trust 2022, *Ginninderry Conservation Trust Annual Report 2021-2022*, prepared for the ACT Government.

SMEC Australia 2018, *Ginninderry Development Offset Management Plan*, prepared for Riverview Projects (ACT) Pty Ltd.

TRC Tourism Ltd 2018, *Ginninderry Conservation Corridor 2018-2023 Management Plan*, prepared for Riverview Projects (ACT) Pty Ltd, with inputs from the Bush on the Boundary Forum, Past Traces, Waters Consultancy and the ACT Government.

Umwelt (Australia) Pty Ltd 2022, *EPBC SA024 West Belconnen Strategic Assessment Compliance Audit*, prepared for Riverview Projects (ACT) Pty Ltd.



**APPENDIX A**

**Conservation Outcomes Compliance Table**

**Table A.5.1 Compliance Table for Conservation outcomes and actions for MNES described in Table 4 of the Program Report (A T Adams Consulting 2017)**

Conservation outcome	Action	Responsibility	Timing	Comment (2022 Audit)	Finding (2022 Audit)
<b>Previously unidentified MNES</b>					
Protection of Matters of National Environmental Significance that are identified in pre-construction surveys for permitted construction work in the WBCC.	1 Prior to development of WBCC infrastructure, site surveys of threatened flora and fauna species will be conducted and populations of threatened flora and fauna species will be avoided or impacts managed in accord with the RMP and EPBC Act.	Riverview Group Environmental Management Trust	Ongoing The survey of PTWL and NTG will occur within 12 months of Ministerial endorsement of the Program Report, and will be made public.	Capital Ecology undertook surveys for Pink-tailed Worm Lizard in 2018/19 and for Natural Temperate Grassland TEC in 2020. The survey results are all available on the Ginninderry website. These surveys occurred more than 12 months after Ministerial endorsement of the Program Report.	Achieved, <b>however not within the timeframe specified.</b>
<b>Golden Sun Moth</b>					
Protection and enhancement of habitat whilst allowing for the intrusion of the Ginninderra drive alignment (refer to (ACT Government, 2013) (David Hogg Pty Ltd, 2011).	2 Vary the Territory Plan to establish conservation reserves at the Jarramlee and West Macgregor offset areas, with provision for Ginninderra Drive.	Riverview Group	Prior to commencement of construction of Ginninderra Drive extension.	The process of applying a <i>Pc: Nature Reserve</i> overlay for Jarramlee and West Macgregor offsets sites via a variation to the Territory Plan was completed on 23 October 2015. Extension to Ginninderra Drive has not yet commenced and is not expected to commence for another 15-20 years.	Achieved.
Mitigation of the impact of Ginninderra Drive extension on GSM habitat in Jarramlee and West Macgregor offset areas.	3 ACT Government to Purchase Lot 2 Wallaroo Road (86.8 Ha) from the Commonwealth catering for the following components: 1.8 Ha as replacement of impacted areas of occupied GSM habitat, 11.9 Ha of occupied GSM habitat, 19.4 Ha of unoccupied GSM habitat, and, Implementation of GSM habitat restoration as a connectivity measure between Jarramlee and Dunlop Grasslands Reserve.	Economic Development Directorate	Land purchase prior to commencement of construction of infrastructure to service the residential estate, habitat restoration prior to commencement of construction of Ginninderra Drive extension.	The Suburban Land Agency (SLA) purchased Lot 2 Wallaroo Road in 2015, to facilitate the Ginninderry Joint Venture GSM offset requirements. Extension to Ginninderra Drive has not yet commenced and is not expected to commence for another 15-20 years.	Achieved.
	4 Apply a conservation covenant requiring the long term protection and enhancement of GSM habitat on lot 2 Wallaroo Road Whilst the covenant will provide long term protection for the Wallaroo Rd offset area, further investigations should occur for the potential to rezone the land to E3 Environmental Management.	Riverview Group to request Yass Valley Council to implement the statutory covenant.	To be implemented concurrently with the amendment to the Yass Valley LEP.	A conservation covenant requiring the long-term protection and enhancement of GSM habitat on Lot 2 Wallaroo Road has not yet been implemented. <b>It is recommended that Riverview Projects engage with Yass Valley Council to implement the statutory covenant.</b>	<b>Not achieved</b>
	5 Prepare a combined offset management plan (OMP) addressing the preservation and enhancement of GSM habitat in Jarramlee and West Macgregor offset areas and Lot 2. Actions in the OMP to include research and trials for golden sun moth larvae translocation. Incorporate the management plan into the WBCC RMP. Lot 2 GSM habitat area to be increased from current 11.9 Ha to 33.1 Ha.	Riverview Group to prepare first draft. Environmental Management Trust to seek approval and implement the plan. Plan to be endorsed by the ACT Conservator and approved by the Minister for the Environment (ACT component) and endorsed by the ACT Conservator of Flora and Fauna (NSW component) in consultation with the NSW Office of Environment and Heritage.	Plan to be finalised within 2 years of Ministerial endorsement of the Program Report, reviewed at intervals of no more than five years thereafter. GSM habitat area increase to be achieved prior to construction of Ginninderra Drive extension.	The Gooromon Grasslands Offset Management Plan which provides an over-arching management plan for the three offset reserves. The Plan was endorsed and approved by the ACT Government. The OMP includes actions for research and trials for golden sun moth larvae translocation, however planning for the research and trials has been paused until further works for the extension of Ginninderra Drive have been confirmed.	Achieved.

Conservation outcome	Action	Responsibility	Timing	Comment (2022 Audit)	Finding (2022 Audit)
Establishment of a governance regime for reserve land (Macgregor, Jarramlee and Lot 2).	6 Establish a West Belconnen Environmental Management Trust (EMT).	Riverview Group	Within 2 years of Ministerial endorsement of the Program Report and prior to construction of Ginninderra Drive extension.	The Ginninderry Conservation Trust (GCT) was established under a Trust Deed on 22 July 2019. While the trust was established prior to the commencement of construction of Ginninderra Drive, it was established more than two years after the date of endorsement of the Program Report (18 July 2017).	Achieved, <b>however not within the timeframe specified.</b>
Implementation of program for research and trials for the translocation of golden sun moth larvae.	7 Research and trials to be undertaken to assist habitat restoration and golden sun moth larvae translocation.	Environmental Management Trust	Research programs and trials to begin with the commencement of the OMP plus 5 years.	The ANU have been engaged in early 2022 for planning the research of GSM larvae translocation. Research and trials will commence in spring/summer 2022. The OMP commenced on 1 October 2018 and is effective for a five-year period to 30 June 2023.	Achieved.
Restoration of GSM habitat.	8 Restore habitat area into which golden sun moth larvae will be translocated, subject to concurrence by the EMT that sufficient evidence exists to ensure a successful outcome. May include further translocation trials of golden sun moth subject to consultation with the Conservator of Flora and Fauna and approval by the Department of the Environment. Restoration may also include stream bank restoration from the Murrumbidgee River along Ginninderra Creek and along Gooromon Ponds Creek up to Wallaroo Road to improve linkages along the riparian areas.	Environmental Management Trust Restoration area should be a site of importance to landscape connectivity determined in conjunction with the ACT Environment and Planning Directorate.	Completion of restoration and then monitored for 15 years.	This has not commenced yet.	Not applicable.
Translocation of GSM larvae from sites that will be impacted by construction of the Ginninderra Drive extension.	9 Translocate GSM larvae from sites that will be impacted by construction of the Ginninderra Drive extension to suitable habitat restoration sites at lot 2 Wallaroo Road using method as refined through the program of research and trials.	Environmental Management Trust Translocation research should build on existing knowledge and trials, undertaken elsewhere in the ACT.	Approval of the OMP plus 20 years, and prior to the construction of Ginninderra Drive extension.	Translocation has not commenced yet. The OMP commenced on 1 October 2018. Extension to Ginninderra Drive has not yet commenced and is not expected to commence for another 15–20 years.	Not applicable.
Ongoing monitoring of impacts on habitat.	10 Adopt field data recorded by Rowell (Rowell A., 2015) as baseline data and ensure that monitoring methods are consistent with those used to measure GSM population and habitat quality and extent across the ACT.	Environmental Management Trust Monitoring to be timed so that it is consistent with GSM monitoring across the ACT.	Every two years from date of endorsement. Monitoring period to be reviewed if impacts have stabilised.	Field data recorded by Rowell (2015) has been adopted as the baseline data. Monitoring methods are consistent with those used to measure GSM population and habitat quality across the ACT.	Achieved.
Establishment of a process of independent third party review of RMP.	11 Prepare an annual report addressing MNES outcomes achieved in the previous year; lessons learned; include a financial audit; report to be made publicly available. Report to be submitted to the ACT Conservator of Flora and Fauna.	Environmental Management Trust.	Within 2 months of the end of each financial year.	An Annual Report has been prepared for the 2019/20 and 2020/21 financial years. The Annual Reports address the MNES outcomes achieved in the previous financial year and lessons learned. The reports are available on the Ginninderry website.	Achieved.
<b>Box Gum Woodland</b>					
A conservation area that includes 100% of identified box gum woodland (68.2 Ha) in conservation area.	12 Vary the Territory Plan, amend the National Capital Plan for all proposed land use changes.	Riverview Group to obtain relevant rezoning and related approvals.	Zoning to be in place prior to commencement of construction in ACT.	The Territory Plan was varied on 23 October 2015 and includes 100% of the identified box gum woodland in the conservation area. This occurred prior to commencement of construction in the ACT. The Commonwealth Government concurrently amended the National Capital Plan to reflect the creation of a conservation corridor.	Achieved.



Conservation outcome	Action	Responsibility	Timing	Comment (2022 Audit)	Finding (2022 Audit)
Preservation and enhancement of woodland habitats. Actual hectares will be used in area measurements.	13 Manage activities in the WBCC in accordance with a Reserve Management Plan. A Reserve Management Plan is a statutory document under the provisions of the Nature Conservation Act. It will need to be determined whether to do a RMP over that area of land not already covered by the Murrumbidgee River Corridor Plan of Management, or whether one plan will be produced for the entire corridor.	Riverview Group to prepare first draft RMP. Environmental Management Trust to seek approval and implement the plan. Plan to be approved by the ACT Conservator and Minister for the Environment (ACT component) and endorsed by the ACT Conservator (NSW component) in consultation with the NSW Office of Environment and Heritage.	Plan to be finalised within 2 years of Ministerial endorsement of MNES plan, reviewed at intervals of no more than five years thereafter.	The Ginninderry Conservation Corridor Reserve Interim Management Plan was endorsed by the ACT Conservator on 19 November 2018 and approved by the ACT Minister for the Environment on 3 January 2019. Activities are being managed in accordance with this plan. It is the intent that this interim plan will be incorporated into the statutory review of the broader Murrumbidgee River Corridor Plan of Management (ACT Government). When the Murrumbidgee River Corridor Plan of Management is updated, the approved Ginninderry Conservation Corridor Management Plan will be recognised and upgraded to a statutory plan consistent with the rest of the Murrumbidgee River Corridor Plan. This is a government process therefore out of the control of Riverview. Given activities are being managed in line with the interim plan, it is considered that Riverview has achieved this outcome.	Achieved.
Establishment of a land management governance regime.	14 Establish a West Belconnen Environmental Management Trust (EMT).	Riverview Group	Within 2 years of Ministerial endorsement of the MNES plan and prior to commencement of construction.	The Ginninderry Conservation Trust (GCT) was established under a Trust Deed on 22 July 2019. The date of endorsement of the Program Report is 18 July 2017. Construction commenced on 22 August 2019.	Achieved, <b>however not in the timeframe specified.</b>
Maintenance and enhancement of connectivity between box gum woodland habitat areas. No appreciable long term net reduction in total box gum woodland habitat areas.	15 All works that may affect box gum woodland to be informed by relevant scientific expert advice and:- Roads and tracks to follow existing alignments where feasible and incorporate appropriate design techniques such as raised grating. Vehicle tracks max 6m wide other tracks/trails max 2.5m wide Unused existing tracks to be rehabilitated Picnic and other facilities involving buildings and car parking to avoid known high value habitat areas.	Environmental Management Trust.	Ongoing	All works that impact Box Gum Woodland are informed by relevant expert advice including the Ginninderry Development Offset Plan and Management Plan. During audit interviews it was confirmed that works are being undertaken in line with the action descriptions. Under the track masterplan (subject to ACT Planning approval), the maximum width allowable for tracks is 2.5m. It is noted that the maximum ground disturbance for the first track delivered in the Conservation Corridor was 2.2m with a maximum track width of 1.2m. Riverside Park has not been built yet therefore facilities and roads in that areas have not been built. The Conservation Corridor has one track that is open and the existing maintenance tracks are in use.	Achieved.
Protect habitat from domestic predators.	16 Impose a cat containment policy for the entire West Belconnen development area and prohibit off-leash dogs in the Conservation corridor.	Transport Canberra City Services (TCCS), formally known as TAMS Environmental Management Trust.	Cat Containment mandated by changes to the relevant instrument under the provisions of the Domestic Animals Act prior to commencement of any works in the ACT. Cat containment in NSW to be implemented if suitable legislation comes in to force. In the absence of specific legislation, environmental planning laws such as planning agreements and/or conditions attached to development consents will be used to impose the controls. Dog control regime to be established by the EMT.	Cat containment has been declared by the ACT Government for the suburbs of Strathnairn and Macnamara. As the development progresses, cat containment will be declared in the next stages, including in NSW as applicable. Dogs are prohibited from entering the Conservation Corridor with signage put up around the Corridor. Information has been provided to residents and published on the Ginninderry website. GCT staff patrol regularly and enforce the dog ban.	Achieved.

Conservation outcome	Action	Responsibility	Timing	Comment (2022 Audit)	Finding (2022 Audit)
Monitoring of impacts on habitat is ongoing Monitoring will be consistent with box gum woodland monitoring across the ACT.	17 Adopt field data recorded by Nash & Hogg 2013 as baseline data. Periodic field research will be conducted to assess change in the extent and quality of BGW habitat.	Environmental Management Trust	Every two years from date of endorsement. Monitoring period to be reviewed if impacts have stabilised.	Field data from Nash and Hogg (2013) has been adopted as the baseline data. The Ginninderry Conservation Corridor Ecological Monitoring Framework draft has been completed. BGW monitoring was conducted in 2021 by Capital Ecology.	Achieved.
Establishment of a process of independent third party review of RMP.	18 Prepare an annual report addressing MNES outcomes achieved in the previous year; lessons learned; include a financial audit; report to be made publicly available Report to be submitted to the ACT Conservator of Flora and Fauna.	Environmental Management Trust	Within 2 months of the end of each financial year.	An Annual Report has been prepared for the 2019/20 and 2020/21 financial years. The Annual Reports address the MNES outcomes achieved in the previous financial year and lessons learned. The reports are available on the Ginninderry website.	Achieved
<b>Pink Tailed Worm Lizard</b>					
A conservation area that includes 90% of identified PTWL habitat (146.4 Ha).	19 Variation to the Territory Plan, amendment to the National Capital Plan and amendment to the Yass Valley Shire local Environment Plan for all proposed land use changes.	Riverview Group to obtain relevant rezoning and related approvals.	ACT zoning to be in place prior to commencement of construction in ACT. NSW zoning to be in place prior to commencement of construction in NSW.	The Territory Plan was varied on 23 October 2015 and includes 89% of the identified PTWL habitat in the conservation area. This occurred prior to commencement of construction in the ACT. The Commonwealth Government concurrently amended the National Capital Plan to reflect the creation of a conservation corridor. The remaining PTWL habitat has been secured through the rezoning of NSW land under the Yass Valley Local Environment Plan (Parkwood) 2020 and associated figures. This Plan came into effect on 17 July 2020. The Plan outlines the rezoning of NSW portion to E2 – Environmental Conservation Zoning and E3 – Environmental Management.	Achieved.
Preservation and enhancement of PTWL habitats. Actual hectares will be used in area measurements.	20 Manage activities in the WBCC in accordance with a Reserve Management Plan.	Riverview Group to prepare first draft. Environmental Management Trust to review the draft and adopt and implement the plan when approved by the Conservator. Plan to be approved by the ACT Conservator and Minister for the Environment (ACT component) and endorsed by the ACT Conservator (NSW component) in consultation with the NSW Office of Environment and Heritage.	Plan to be finalised within 2 years of Ministerial endorsement of the Program Report, reviewed at intervals of no more than five years thereafter.	The Ginninderry Conservation Corridor Reserve Interim Management Plan was endorsed by the ACT Conservator on 19 November 2018 and approved by the ACT Minister for the Environment on 3 January 2019. Activities are being managed in accordance with this plan. It is the intent that this interim plan will be incorporated into the statutory review of the broader Murrumbidgee River Corridor Plan of Management (ACT Government). When the Murrumbidgee River Corridor Plan of Management is updated, the approved Ginninderry Conservation Corridor Management Plan will be recognised and upgraded to a statutory plan consistent with the rest of the Murrumbidgee River Corridor Plan. This is a government process therefore out of the control of Riverview. Given activities are being managed in line with the approved interim plan, it is considered that Riverview has achieved this outcome.	Achieved.
Establishment of a land management governance regime.	21 Establish a West Belconnen Environmental Management Trust.	Riverview Group	Within 2 years of Ministerial endorsement of the Program Report and prior to commencement of construction.	The Ginninderry Conservation Trust (GCT) was established under a Trust Deed on 22 July 2019. The date of endorsement of the Program Report is 18 July 2017. Construction commenced on 22 August 2019.	Achieved, <b>but not within the specified timeframe.</b>

Conservation outcome	Action	Responsibility	Timing	Comment (2022 Audit)	Finding (2022 Audit)
Maintenance and enhancement of connectivity between PTWL habitat areas. No appreciable long term net reduction in total PTWL habitat areas.	22 All works that may affect PTWL habitat to be informed by relevant scientific expert advice and:- Roads and tracks to follow existing alignments where feasible and incorporate appropriate design techniques such as raised grating Vehicle tracks max 6m wide other tracks/trails max 2.5m wide Unused existing tracks to be rehabilitated. Picnic and other facilities involving buildings and car parking to avoid known high value habitat areas. Active habitat restoration works will be undertaken.	Environmental Management Trust	Ongoing	All works that impact Box Gum Woodland are informed by relevant expert advice including the Ginninderry Development Offset Plan and Management Plan. During audit interviews it was confirmed that works are being undertaken in line with the action descriptions. Under the track masterplan (subject to ACT Planning approval), the maximum width allowable for tracks is 2.5m. It is noted that the maximum ground disturbance for the first track delivered in the Conservation Corridor was 2.2m with a maximum track width of 1.2m. Riverside Park has not been built yet therefore facilities and roads in that areas have not been built. The Conservation Corridor has one track that is open and the existing maintenance tracks are in use.	Achieved.
Pink tailed worm lizard protected from domestic predators.	23 Impose a cat containment policy in the for the entire West Belconnen development area. Prohibit off-leash dogs in the Conservation corridor.	Transport Canberra City Services (TCCS), formally known as TAMS Yass valley Shire Council Environmental Management Trust	Cat Containment in the ACT to be mandated by changes to the relevant instrument under the provisions of the Domestic Animals Act prior to commencement of any works. Cat containment in NSW to be implemented if suitable legislation comes in to force. In the absence of specific legislation, environmental planning laws such as planning agreements and/or conditions attached to development consents will be used to impose the controls. Dog control regime to be established by the EMT.	Cat containment has been declared by the ACT Government for the suburbs of Strathnairn and Macnamara. As the development progresses, cat containment will be declared in the next stages, including in NSW as applicable. Dogs are prohibited from entering the Conservation Corridor with signage put up around the Corridor. Information has been provided to residents and published on the Ginninderry website. GCT staff patrol regularly and enforce the dog ban.	Achieved.
Ongoing monitoring of impact on habitat. Monitoring will be consistent with PTWL monitoring across the ACT.	24 Adopt field data recorded by Osborne & Wong 2013 as baseline data. Conduct periodic field research to assess change in the extent and quality of PTWL habitat.	Environmental Management Trust	Within 2 months of the end of each financial year.	Field data by Osborne and Wong (2013) has been adopted as the baseline data. Field research will be conducted bi-annually in accordance with the Ginninderry Conservation Corridor Ecological Monitoring Framework (Umwelt 2021).	Achieved.
Establishment of a process of independent third party review of RMP.	25 Prepare an annual report addressing MNES outcomes achieved in the previous year; lessons learned; include a financial audit; report to be made publicly available Report to be submitted to the ACT Conservator of Flora and Fauna.	Environmental Management Trust	Ongoing	An Annual Report has been prepared for the 2019/20 and 2020/21 financial years. The Annual Reports address the MNES outcomes achieved in the previous financial year and lessons learned. The reports are available on the Ginninderry website.	Achieved.
<b>Natural Temperate Grassland</b>					
Management Actions as prescribed in the most recent approved version of the Jarramlee Offset Management Plan (ACT Government, 2013)	26 Manage Jarramlee Offset site in accord with the Jarramlee Offset Management Plan.	Environmental Management Trust	Ongoing	The Jarramlee Offset Management Plan has been incorporated into the Gooromon Grasslands Offset Management Plan.	Achieved.

Conservation outcome	Action	Responsibility	Timing	Comment (2022 Audit)	Finding (2022 Audit)
Implementation of assessment process for additional unanticipated impacts to any area dominated by native grasses that is part of a larger patch of native grassland which includes high or moderate quality pink-tailed worm lizard habitat as mapped by Osborne and Wong (2013).	27 Follow the defined process strategy (see s5.3.4 of this Program Report). When triggered the strategy involves: 1. Assess the impact using data collected from site-based field verified surveys as per EPBC guidelines 2. Implement avoidance & mitigation measures where practicable 3. Determine offset requirements for any residual impacts 4. Identify an appropriate offset and establish Prepare & implement an offset management plan to incorporate in the WBCC management plan or a standalone plan	Riverview Group Environmental Management Trust	Ongoing	The DPS was triggered for Macnamara, however the quality of NTG habitat meant that no additional offsets were required.	Achieved.
<b>Major changes to infrastructure location (e.g. sewer alignment)</b>					
Implementation of assessment process for additional unanticipated impacts to MNES within the Project Area due to major changes to infrastructure location (e.g. sewer alignment).	28 Follow the defined process strategy (see s5.3.4 of this Program Report). When triggered the strategy involves: 1. Assess the impact using data collected from site-based field verified surveys as per EPBC guidelines 2. Implement avoidance & mitigation measures where practicable 3. Determine offset requirements for any residual impacts 4. Identify an appropriate offset and 5. establish Prepare & implement an offset management plan to incorporate in the WBCC management plan or a standalone plan	Riverview Group Environmental Management Trust	Ongoing	The DPS is being adopted. During the 20-21 year, the proposed track for the Corridor was assessed using the DPS.	Achieved.
<b>Threatened bird species</b>					
Mitigate indirect impacts from urban development on threatened bird species.	29 Implementation of CEMP's, WSUD principles, and the WBCC RMP. Replace affected farm dams with the provision of constructed wetlands where possible.	Riverview Group Environmental Management Trust	Ongoing	A Ginninderry Development Construction Environment Management Plan (CEMP) Framework report has been endorsed by the Commonwealth. The CEMP Framework is required to be addressed in all civil contractor CEMPs for urban development at Ginninderry. All CEMP, civil contracts are signed off by the ACT Planning Authority.  WSUD principles have been implemented including the establishment of a wetland pond at Paddy's Park and re-establishment of the dam adjacent to the Link Building.	Achieved.

