



# Ginninderry

**The Link – Sales and Information Centre**  
1 McClymont Way, Strathnairn ACT 2615  
PO Box 484, Kippax ACT 2615  
T. 1800 316 900

██████████  
Director, ACT & Sydney  
Assessment Section  
Department of Climate Change, Energy,  
The Environment and Water  
John Gorton Building,  
King Edward Terrace,  
Parkes ACT 2600

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## Clarification Letter – Defined Process Strategy, Ginninderry Project

Dear ████████,

Following the ongoing meetings, liaison, and assessment of the Defined Process Strategy (DPS), the purpose of this letter is to clarify the implementation of the DPS for the Ginninderry Project in accordance with Section 5.3.4 of the Program Report.

Impacts in the Ginninderry Conservation Corridor (GCC) have been described in the Program Report (s.3.12 p11, Section 3.6 (p18), and Section 3.6.2 (pp24-25)) and visually represented in Figure 11 of the Program Report.

The Program Report acknowledges 16.4 ha of Pink Tailed Worm Lizard (PTWL) habitat and 3.8 ha of EPBC Act Box-Gum Woodland habitat are impacted by the urban development. The creation of the conservation corridor that incorporates 100% of the Project area of the box gum woodland and 145.8ha of PTWL habitat will result in enhancements in connectivity between PTWL areas and an increase in overall habitat area which will offset the loss of 16.4 ha of PTWL from the urban area (Program Report p12).

To manage the impacts on the 3.8ha Drake Brockman Drive woodland patch, the Program Report (p30) identifies that the impacts will be offset by enhanced management of the West Molonglo patch. Management of the West Molonglo patch, as described in the Program Report, will be reported on in Annual Reports.

Determination of the exact size of the offset requirements for impacts to MNES for the Ginninderry Project has been undertaken per Appendix G – Table 4 in accordance with the *Offsets Assessment Guide*, under the *Environment Protection and Biodiversity Conservation Act 1999* for Pink-tailed Worm-lizard and Box-Gum Woodland. NTG TEC habitat quality scores for use in the Offsets Assessment Guide were determined using the methodology detailed in Section 5.2.4 of the Strategic Assessment Report (refer to Table 1 in Appendix A for further information).

Since the Strategic Assessment report, the Ginninderry Conservation Trust has actively managed the GCC. Accordingly, Table 2, Appendix B, captures the variables that are considered likely to have changed since the

Strategic Assessment was completed. These values have been used to calculate the impacts on MNES for the GCC and will be used to calculate impacts on MNES in the future.

Direct, indirect, and cumulative impacts from activities on the GCC on MNES are described in Section 4 of the Program Report and are expanded upon in Section 3 of the Program Report. The below identifies these impacts on MNES –

- NTG TEC (p27): Direct impacts to natural temperate grassland will be avoided by the Program of urban development and the alignment of Ginninderra Drive and is not discussed further in this section;
- BGW TEC (p29): Cumulative impacts to retained box gum woodland may arise from increased public access to the WBCC and the introduction of associated services and infrastructure;
- PTWL (p39): Cumulative impacts will arise from increased public access to the WBCC for recreational purposes. Disturbance to small areas (20m x 20m) to enable tunneling and shaft construction will occur.

The impacts on MNES from relevant actions identified in Figure 11 of the Program (Section 3.6.2) have been calculated using Figure 11, and the Osbourne and Wong (2013) and David Hogg Pty Ltd (2015) mapping.

The impacts are calculated per the Program Report for the following actions –

- 20m x 20m construction area for seven vertical shafts – sewer tunnel alignment (p14 & p39);
- 2.5m walking track width – walking track network (p24, p48 & p50);
- 6m vehicle track width – sealed road (p24, p48 & p50). The road is assumed to require a 20m wide disturbance corridor;
- The physical area as shown in Figure 11 calculated for Riverside Park and the Living River Discovery Centre & Conservation Corridor Headquarters.

The above actions and associated impacts on MNES have been calculated in Table 3, Appendix C.

Figure 11 (Figure 1 in (Appendix D)), of the Program Report, identifies the actions described above. Figure 2 (Appendix E) and Figure 3 (Appendix F) identify the Osbourne and Wong 2013 mapping (PTWL) and David Hogg Pty Ltd 2013 mapping (EPBC Act BGW), respectively against the actions represented in Figure 11 of the Program Report. Tables 3 & 4 (Appendix C and Appendix G) are evidence to DCEWW that the Program Report's impact budgets have been calculated in accordance with Figure 11 of the Program Report.

Actions that trigger the DPS and their associated offset requirements are identified in in Table 4. Table 4 calculates the offsets required for approved or proposed actions undertaken since the Strategic Assessment. Further, Table 4 indicates that whilst the MNES impact budgets identified in Table 3 have been exceeded the overall offset impact budgets available in the corridor have not been exceeded. Future annual reporting will provide the mapping of the associated offsets attributed to the actions per Table 4 (Appendix G).

Based on the above considerations the majority of further actions taken in the GCC that impact MNES will trigger Criterion 2 of the DPS because they will impact MNES beyond what is already described in the Program.

The outcome of future actions must be considered in line with the Program Report, including Section 5.3.4, and the DPS process. Any future development will be subject to assessment against the DPS and will be reported on in the Annual Report.

Yours Sincerely,



**Imogen Featherstone** Development Manager (Planning)

**Appendix A – Table 1. NTG-SHE Habitat Quality scores for use in the EPBC Act Calculator**

| Habitat Quality                         | NTG-SHE                  |                           |
|-----------------------------------------|--------------------------|---------------------------|
|                                         | Moderate to High Quality | High to Very High Quality |
| Start Habitat Quality                   | 5                        | 7                         |
| Future Habitat Quality (without offset) | 4                        | 6                         |
| Future Habitat Quality (with offset)    | 6                        | 8                         |

Table and calculations prepared by Capital Ecology, September 2023.

**Appendix B – Table 2. EPBC Act Offset Calculator variables that are considered likely to have changed since the Strategic Assessment was completed**

| EPBC Act Offset Calculator variable | Previous value                   | Proposed value                   | Justification for change                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------|----------------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Risk of loss without offset         | 5%                               | 0%                               | As per advice from the Commonwealth, the risk of loss should be lowered to 0% as the GCC is under protection and not at risk of development.                                                                                                                                                                                                                                                                                                                                                                                                |
| Risk of loss with offset            | 5%                               | 0%                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Confidence in result                | 90%                              | 95%                              | The GCC has been managed by the GCT since 2019. As such, effective management processes have been established and implemented. The successful management of the GCC is supported by the proven track record of the GCT <sup>8</sup> , which shows that the targeted management actions are having the desired impact. This in turn is considered likely to reduce the expected time until ecological benefit and increase the confidence in the result for both the success of the offset and the estimated improvement in habitat quality. |
| Time until ecological benefit       | 20 years (BGW)<br>5 years (PTWL) | 15 years (BGW)<br>2 years (PTWL) |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Confidence in result                | 90%                              | 95%                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

Table and calculations prepared by Capital Ecology, September 2023.

**Appendix C – Table 3. The impact on MNES in the GCC from actions identified in Figure 11 of the Program Report (i.e. the Program Report impact budget)**

| Facility Type                                    | MNES                    |                           |                           |
|--------------------------------------------------|-------------------------|---------------------------|---------------------------|
|                                                  | Pink-tailed Worm-lizard |                           | EPBC Act Box-Gum Woodland |
|                                                  | Low Quality Habitat     | Mod- High Quality habitat |                           |
| Sewer Tunnel                                     | 0 ha                    | 0.00 ha                   | 0.02 ha                   |
| Tracks and Trails                                | 0 ha                    | 0.30 ha                   | 0.85 ha                   |
| Riverside Park and Living River Discovery Centre | 0 ha                    | 0.34 ha                   | 0.02 ha                   |
| <b>TOTAL</b>                                     | <b>0 ha</b>             | <b>0.64 ha</b>            | <b>0.89 ha</b>            |

Table and calculations prepared by Capital Ecology, September 2023.

Appendix D – Figure 1. Actions identified in Figure 11 of the Program Report

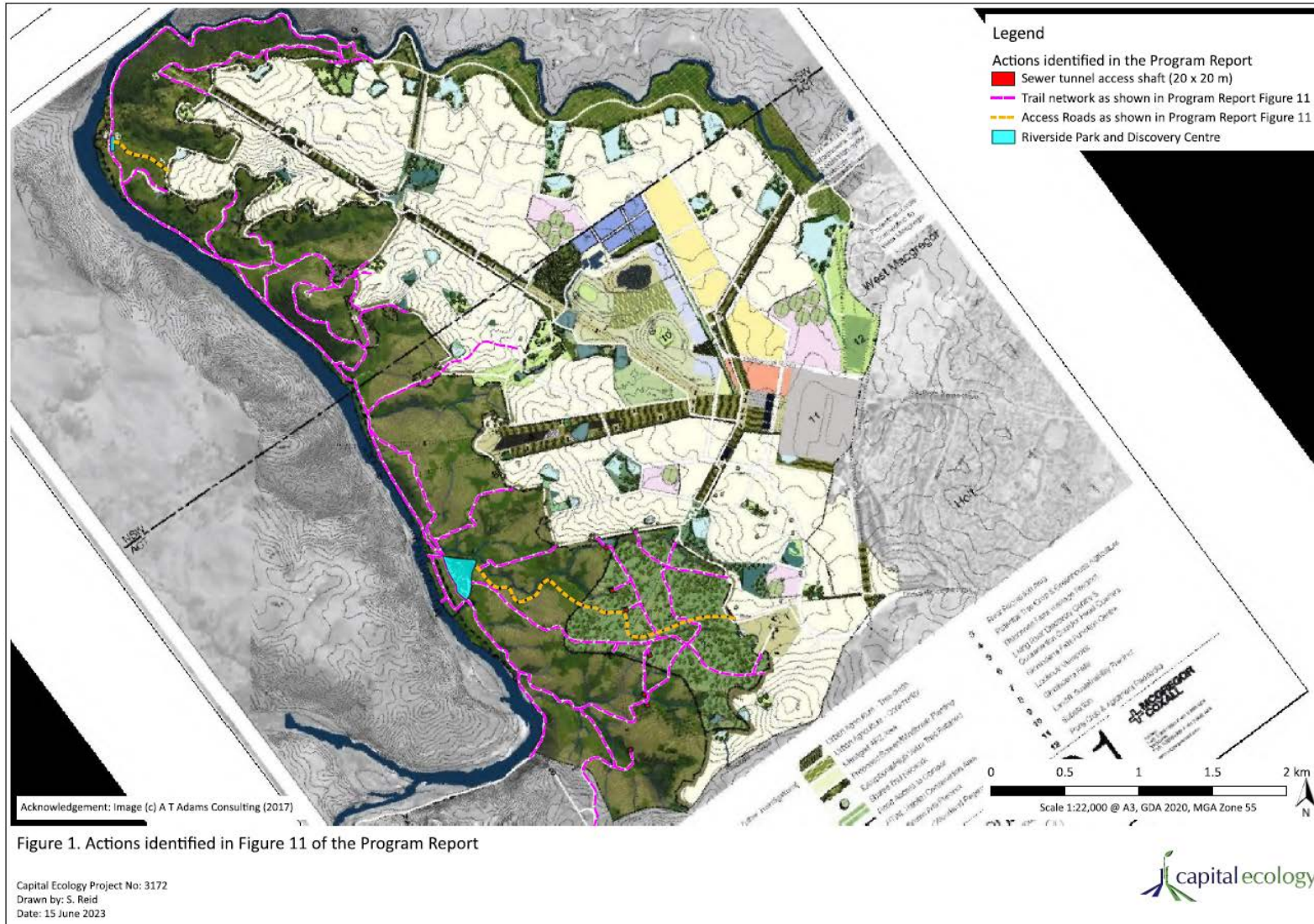


Figure 1. Actions identified in Figure 11 of the Program Report

**Appendix E – Figure 2. The impact of actions identified in Figure 11 of the Program Report on Pink-tailed Legless Lizard**

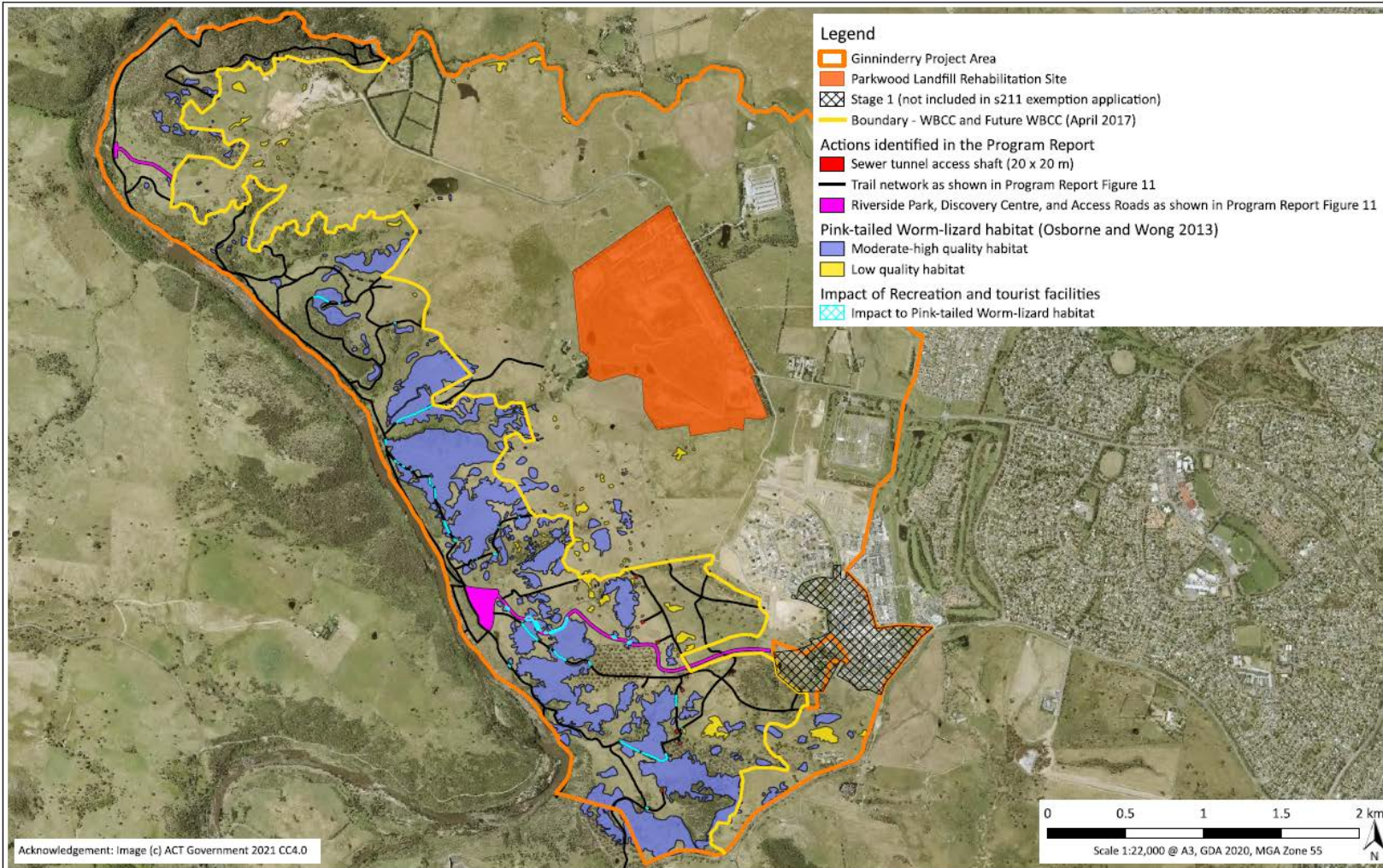
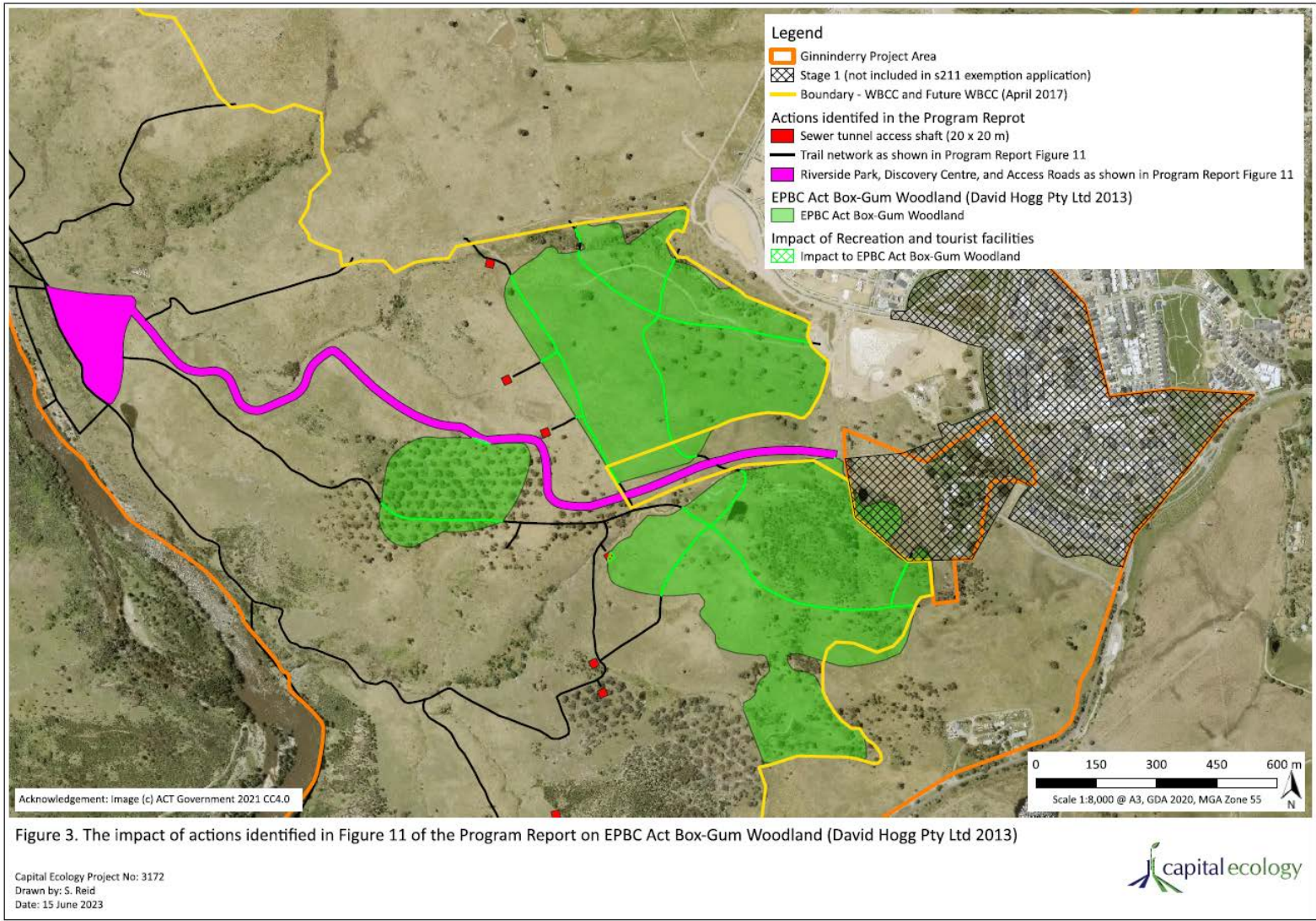


Figure 2. The impact of actions identified in Figure 11 of the Program Report on Pink-tailed Legless Lizard (Osborne and Wong 2013)

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 Drawn by: S. Reid  
 Date: 15 June 2023



**Appendix F - Figure 2. The impact of actions identified in Figure 11 of the Program Report on EPBC Act Box-Gum Woodland**





Appendix G - Table 4: The impact and associated offset for all DPS related work in the Ginninderry Project

| Facility Type                                  | MNES                       |                                 |                      |                           |
|------------------------------------------------|----------------------------|---------------------------------|----------------------|---------------------------|
|                                                | Pink-tailed<br>Worm-lizard | EPBC Act<br>Box-Gum<br>Woodland | NTG-SEH              |                           |
|                                                |                            |                                 | Mod- High<br>Quality | High-Very<br>High Quality |
| Initial direct offsets available in the GCC    | 161.00 ha                  | 60.20 ha                        | 29.11 ha             | 15.36 ha                  |
| Strategic Assessment / Program Report – offset | 96.90 ha                   | 16.60 ha                        | 0.00                 | 0.00 ha                   |
| Murrumbidgee Trunk Sewer – impact              | 0.03 ha                    | 0.17 ha                         | 0.00 ha              | 0.00 ha                   |
| Murrumbidgee Trunk Sewer – offset              | 0.26 ha                    | 1.28 ha                         | 0.00 ha              | 0.00 ha                   |
| Strathnairn Residents Trail – impact           | 0.18 ha                    | 0.24 ha                         | 0.00 ha              | 0.00 ha                   |
| Strathnairn Residents Trail – offset           | 0.00 ha                    | 0.00 ha                         | 0.00 ha              | 0.00 ha                   |
| Ginninderry Trails Phase 2 – impact            | 0.99 ha                    | 0.39 ha                         | 0.18 ha              | 0.12 ha                   |
| Ginninderry Trails Phase 2 – offset            | 7.36 ha                    | 0.00 ha                         | 1.28 ha              | 1.19 ha                   |
| Riverside Park – impact                        | 0.55 ha                    | 0.18 ha                         | 0.98 ha              | 0.05 ha                   |
| Riverside Park – offset                        | 1.78 ha                    | 1.36 ha                         | 6.92 ha              | 0.50 ha                   |
| Remaining direct offsets available in the GCC  | 52.95 ha                   | 39.98 ha                        | 19.75 ha             | 13.50 ha                  |

Table and calculations prepared by Capital Ecology, September 2023.