



Ms Imogen Featherstone
Development Manager (Planning) RPIA
Ginninderry

imogen@ginninderry.com

Dear Ms Featherstone

Thank you for your letter of 8 November 2023 clarifying the implementation of the Defined Process Strategy (DPS) for the West Belconnen (Ginninderry) Strategic Assessment in accordance with section 5.3.4 of the endorsed *Program Report - Urban Development at West Belconnen (AT Adams Consulting, April 2017)* (Program).

The Department of Climate Change, Energy, the Environment and Water (department) understands that information in your letter has been taken from Capital Ecology's *Review of impacts, offsets, and application of the Defined Process Strategy in the Ginninderry project area* (September 2023), which was provided to the department on 6 September 2023. The department acknowledges the considerable work undertaken by Capital Ecology to help clarify the implementation of the DPS.

The department has considered the information in your letter and broadly agrees with its outcomes. In particular, the department agrees that the majority of future actions proposed in the West Belconnen (Ginninderry) Conservation Corridor (GCC) that impact on relevant matters of national environmental significance (MNES) will trigger Criterion 2 of the DPS because they will impact MNES beyond what is already described in the endorsed Program. The department's understanding of the elements of your letter are outlined below.

Determination of remaining offsets for MNES in the GCC prior to the implementation of any DPS process

- Appendix G of the letter identifies that the GCC initially had 161 hectares (ha) and 60.2 ha of direct offsets available for the Pink-tailed Worm-lizard (PTWL) and EPBC Act Box-Gum Woodland threatened ecological community (BGW TEC) respectively.
- The GCC includes the offsets for the 16.4 ha impact to PTWL habitat and 3.8 ha impact to BGW TEC because of the development of the Ginninderry urban area. Appendix G of the letter identifies these offset values as 96.9 ha and 16.6 ha respectively; calculated using the approved offset process in Table 5.16 and Table 5.21 of the Strategic Assessment Report (SAR).
- Based on Appendix G of the letter, the amounts of remaining offsets in the GCC for the PTWL and BGW TEC at the implementation of the endorsed Program were 64.1 ha and 43.6 ha respectively.
- Of relevance to the implementation of the DPS, Appendix G of the letter identifies that the GCC initially had 29.11 ha of moderate/high quality EPBC Act Natural Temperate Grasslands TEC (NTG)

TEC) and 15.36 ha of high/very high quality NTG TEC. The department notes that no amount for low quality NTG TEC in the GCC has been determined.

- The NTG TEC habitat quality scores for use in the Offsets Assessment Guide (OAG) were determined using the methodology detailed in section 5.2.4 of the SAR (Appendix A).
- Appendix B of the letter states that certain values for use in the OAG have changed since the endorsement of the Program. The department agrees with these updated values and understands that the new values will be used in future Environmental Impact Assessments and DPS processes when calculating offsets for relevant MNES.

Calculation of impacts on MNES as described in section 3 (and Figure 11) and section 4 of the Program

- As noted in the letter, sections 3.1 and 3.6 (and Figure 11) of the endorsed Program outline the actions allowed to be undertaken in the GCC.
- Further, section 4 of the endorsed Program states that there will be impacts to BGW TEC (p29) and PTWL habitat (p39) in the GCC for public infrastructure, public access, recreation and sewer construction. Section 4 does not specify any impacts on NTG TEC in the GCC (p27).
- Using the Osborne and Wong (2013) and David Hogg Pty Ltd (2013) mapping that informed the endorsed Program, Ginninderry has calculated the direct impacts on PTWL and BGW TEC in the GCC from actions allowed for by the Program and identified in Figure 11 (p25) (Appendices C, E and F of the letter). These values are considered as 'impact budgets'.
- These impact budgets have been considered against Criterion 2 of the DPS for each action proposed to be undertaken in the GCC since the endorsement of the Program (Appendix G). Ginninderry have provided offsets only where the impact budgets for PTWL and BGW TEC have been exceeded, however all impacts to NTG TEC in the GCC have been offset (Appendix G).
- Due to the implementation of these DPS processes, the impact budgets for each action type have been exceeded except for 'Facility Type: Tracks and trails' for BGW TEC (Appendix G). There is 0.22 ha of impact budget remaining (out of 0.85 ha).

Future implementation of the DPS

- As stated in the letter, the department agrees that the majority of future actions proposed in the GCC that impact on relevant MNES will trigger Criterion 2 of the DPS because they will impact MNES beyond what is already described in the endorsed Program (i.e. sections 3 and 4, and Figure 11).
- As of November 2023, Appendix G of the letter identifies how much offsets are still available in the GCC for PTWL (52.95 ha), BGW TEC (39.98 ha), NTG TEC (moderate/high quality) (19.75 ha) and NTG (high/very high quality) (13.50 ha).
- The department understands that the outcomes of future DPS processes, undertaken in accordance with section 5.3.4 of the endorsed Program, will be reported on in relevant annual reports.

- As part of this annual reporting process, the department recommends that Ginninderry updates the amounts and locations of offsets for each MNES in the GCC; and updates the amounts of the remaining areas in the GCC which can be used as offsets for each MNES in the future.

Next steps

The department understands that Ginninderry intends to provide a discussion of the DPS clarification process and the future implementation of the DPS in its 2023-24 Annual Report. Further, the department understands that the 2023-24 Annual Report will clarify the existing amounts and locations of offsets for each MNES in the GCC; and confirm the amounts of the remaining areas in the GCC which can be used as offsets for each MNES in the future.

Thank you again for working collaboratively with the department on clarifying the implementation of the DPS of the endorsed Program.

Yours sincerely,



██████████
A/g Director

Environment Assessments (NSW, ACT) Branch

11 January 2024