



**CONSERVATION
COUNCIL**
ACT REGION

Submission: Stage 2A Light Rail Extension - City to Commonwealth Park

SEPTEMBER 2020

The **Conservation Council ACT Region** is the peak non-government environment organisation for the Canberra region. We have been the community's voice for the environment in the Canberra region since 1981. Our mission is to achieve an ecologically sustainable and zero net carbon society through advocacy, education, research and engagement with the community, the private sector and with government.

We have more than 45 member groups who in turn have over 20,000 supporters. We harness the collective expertise and experience of our member groups and networks. We work collaboratively with Government, business and the community to achieve the highest quality environment for Canberra and its region.

For further inquiries regarding this submission please contact:

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Stage 2A: Light Rail Extension - City to Commonwealth Park

The Conservation Council ACT Region welcomes the opportunity to make a brief submission on Stage 2A of the light rail extension which proposes to extend the existing City to Gungahlin light rail line to Edinburgh Avenue, City South and Commonwealth Park.

The Council was pleased to see that the preliminary documentation for Stage 2A of the project reasonably outlines the impacts that this development will have on the Golden Sun Moth (GSM) habitat, and consequently the GSM population present. We also acknowledge that to compensate for the residual impacts of this development, the ACT Government will purchase biodiversity credits prior to construction for offsetting.

A recent review of the offsets in the ACT illustrated that offsets are unlikely to achieve no net loss and their management is not sufficiently transparent.¹ As such, the Conservation Council principally opposes the use of offsets. However, we acknowledge that the extension of the light rail will broaden opportunities for the community to utilise public transport within the existing urban footprint, and that effort has been made to mitigate against the impacts of development on GSM where possible, for example, by removing the initially proposed traction power substation at Commonwealth Park. We also note that the GSM habitat is of low quality conservation value and has low GSM population density.

The proposal states that the offsets package for this development will be delivered through the NSW Biodiversity Offsets Scheme and through payment into NSW's Biodiversity Conservation Trust (p.56). However, it is not clear how this interjurisdictional Biobanking will work and be managed. For example, as the project lies within ACT borders but will be managed through the NSW offset scheme, will the offset be published on the ACT Offsets Register? We would like to know more about how this offsetting process will work to ensure accountability for no net loss of this critically endangered species.

The Conservation Council would also like to see the ACT's Golden Sun Moth Action Plan (2017) and the ACT Native Grassland Conservation Strategy (2017) acknowledged and integrated in the documentation. This will provide strategic direction to ensuring local and regional conservation of the species.

¹ Connors, B, (2019) A review of biodiversity offsets implemented in the Australian Capital Territory under the *Environment Protection and Biodiversity Conservation Act 1999*, Honours Thesis.