



**CONSERVATION  
COUNCIL** ACT REGION

## Investigation #2: Lot 2 Wallaroo Road – an environmental offset not adequately protected

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14 May 2026

The Conservation Council ACT Region is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

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## Overview

On 1 Sep 2017, Riverview Projects (ACT) Pty Ltd (Riverview) obtained an approval, under Part 10 of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), to proceed with a program of urban development in West Belconnen in the ACT and NSW (now Ginninderry; the Ginninderry Approval).

In a few years' time, Ginninderry will have grown beyond the ACT and into NSW; by then, Riverview plan, and under the Ginninderry Approval they are already authorised, to extend an existing arterial road, 'Ginninderra Drive', through Jaramlee–West MacGregor Grasslands Nature Reserve (Jaramlee NR) to connect Ginninderry's future northern suburbs with the rest of Canberra. The approved alignment of the Ginninderra Drive extension is shown in [Figure 1](#).

Jaramlee NR was established early last decade as an environmental offset for two other residential development projects that have already been completed in Macgregor and Lawson South. The offset requirement for these earlier projects included the protection and management of the Jaramlee NR.

As an offset for impacting Jaramlee NR in the future, the Ginninderry Approval requires Riverview to protect and manage Lot 2 Wallaroo Road, Wallaroo, in Yass Valley Shire, NSW (Lot 2). In their Program Report, Riverview committed, and they are now required by the Ginninderry Approval, to deliver "A biodiversity offsets package for GSM [Golden Sun Moth] which **will place [Lot 2]** supporting threatened species **into protected areas**."

Recently, Riverview submitted a planning proposal to NSW authorities responsible for the zoning of land in NSW. Riverview proposed rezoning Lot 2 to a zoning that provides for the construction of an electricity sub-station in the middle of Lot 2 (Riverview's concept is at [Figure 2](#)). On 23 April 2026, Yass Valley Council adopted that planning proposal and rezoned Lot 2. The zoning, whatever it is, is not the same as including Lot 2 in a protected area.

The potential loss of these two environmental offsets, Lot 2 and Jaramlee NR, as well as the losses that have already occurred in Macgregor and Lawson South, are a serious issue *per se*. Each of these developments has destroyed or will destroy Golden Sun Moth (GSM) individuals and fragment their habitat. Fragmentation is an issue for GSM. Even if the patch upon which the sub-station may be constructed is the most degraded habitat within Lot 2, building on it will permanently remove the possibility of that potential habitat being restored.

If Lot 2 must be damaged, then we say Riverview will need to find and protect an offset for damaging the offset site (the impact on GSM at Lot 2), that was required as compensation for damaging an offset site (the impact on GSM of extending Ginninderra Drive through Jaramlee NR), that was required as an offset for two other developments (the impact on GSM of developing Macgregor and Lawson South).

The detail section of this paper examines and then discusses Riverview's performance against its obligations to protect Lot 2. The [Attachment](#) includes a selection of Riverview's conservation commitments, now obligations, related to the status, protection and management of GSM.

## Questions

In relation to this case:

- If Riverview are not obliged to restore all of Lot 2, why not? That would say the initial offset proposal to protect and manage Lot 2 was deficient in the first place.
- What has the regulator, the Federal Department of Climate Change, Energy, the Environment and Water (DCCEEW), had to say about Riverview's sub-station proposal? Do they know about it? What's their view on Riverview's argument that the rezoning is better than adding a protected area to Australia's National Reserve System?

The bigger questions are:

- How are environmental offsets soooooo vulnerable to the interests of developers? What does it say about the future of every environmental offset in the ACT that Riverview—which is majority (60 per cent) owned by the ACT Government's Suburban Land Agency (SLA)—are preparing to develop not one but two environmental offsets, i.e., at Jaramlee NR and Lot 2?
- If the actions concerned are genuinely necessary, will the compensation required compound, seriously compound, to serve as a disincentive to further losses?

## Recommendations

1. Wherever significant residual impacts at impact sites *must* occur—and note, for nature's sake, as a society we need to stop damaging nature in the first place—by the time the action causing damage at that impact site commences, every environmental offset ought be dedicated as a nature reserve, or equivalent.
2. If in future offset sites are to be places where nature repair and restoration occurs, those sites to be under repair must also be permanently, formally, securely legally protected.

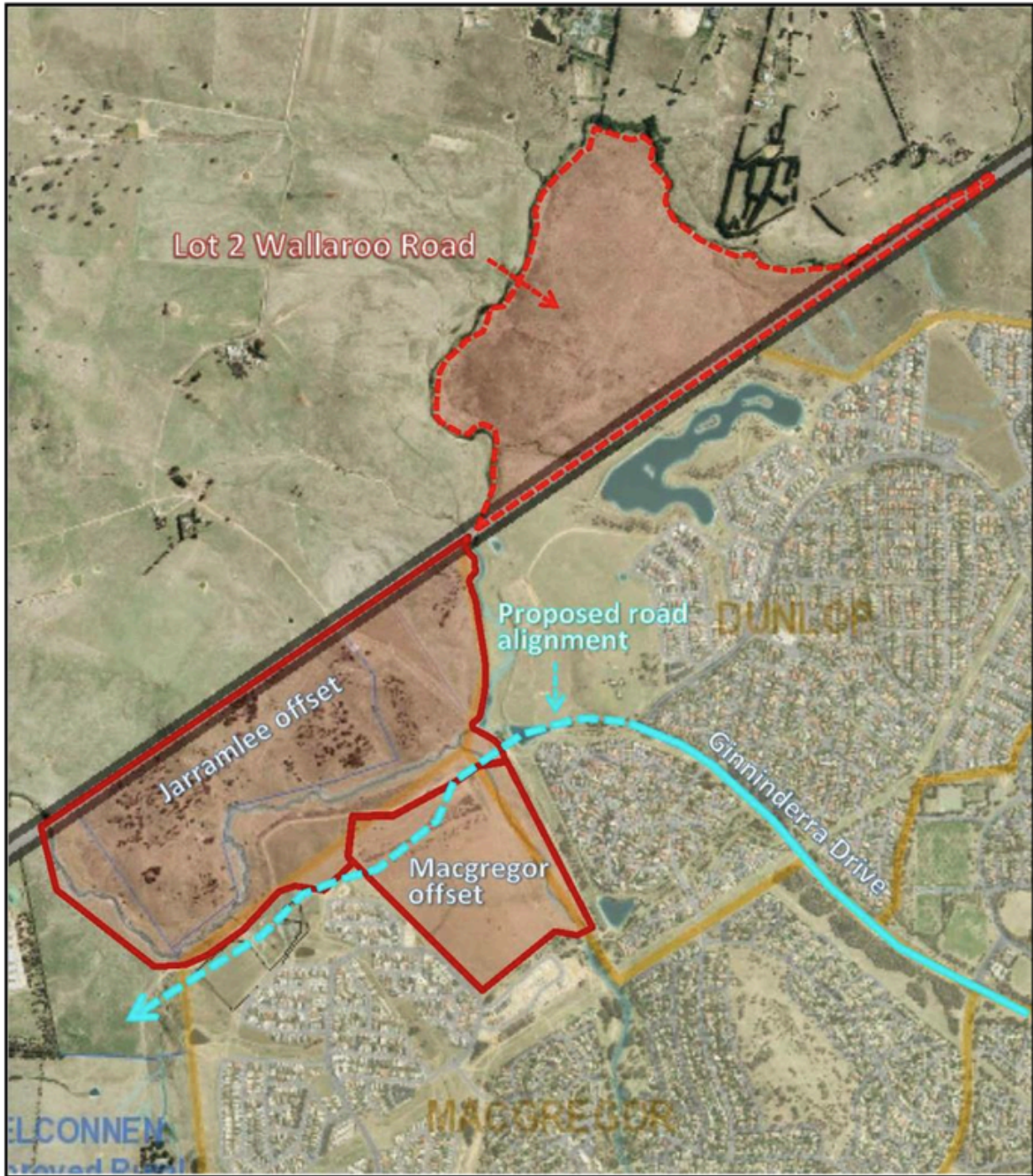


Figure 1: Location and extent of the Golden Sun Moth Conservation Reserves in ACT & NSW<sup>1</sup>

<sup>1</sup> A T Adams Consulting (April 2017) *Urban Development at West Belconnen Program Report*, Report prepared for Riverview, [www.dcceew.gov.au/sites/default/files/env/pages/f0e0261d-5c7f-4589-a0ec-c8879c09b7c2/files/sa024-assessment-program-report.pdf](http://www.dcceew.gov.au/sites/default/files/env/pages/f0e0261d-5c7f-4589-a0ec-c8879c09b7c2/files/sa024-assessment-program-report.pdf), Figure 14

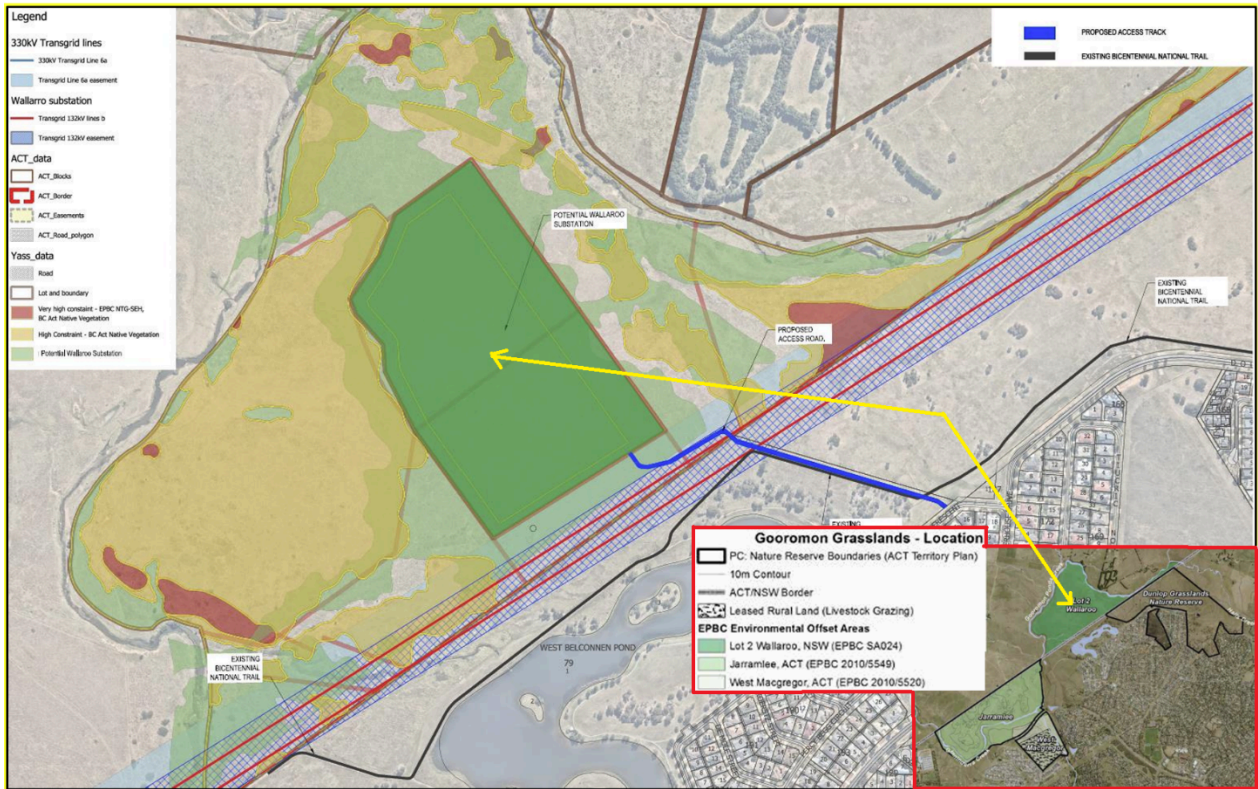


Figure 2: Location of the “potential Wallaroo sub-station” in the middle of Lot 2<sup>2</sup>

## Detail

The Ginninderry Joint Venture is a land development project formed in 2016. The Ginninderry project’s operation is governed by a commercial agreement between the SLA and Riverview; these partners hold a 60:40 equity share, respectively.<sup>3</sup> Riverview is the development manager.

The Ginninderry Approval is a conditional approval that enables Riverview to develop four planned suburbs in Ginninderry.<sup>4</sup> By the time the Ginninderry Approval expires in 2067, it is expected Ginninderry will include 11,500 homes housing 30,000 people.<sup>5</sup> The Ginninderry

<sup>2</sup> Knight Frank Town Planning Sydney (1 April 2025) *Planning Proposal: Wallaroo Road Lot 2 DP 1144979* (PP2025-610). Proposal prepared on behalf of Riverview and submitted to Yass Valley Council, <https://apps.planningportal.nsw.gov.au/prweb/PRRestService/DocMgmt/v1/PublicDocuments/DATA-WORKATTACH-FILE%20PEC-DPE-EP-WORK%20PP-2025-610!20250626T070508.672%20GMT>, Fig 12 on p. 18; The inset, bottom right, with its Legend, comes from: ACT Parks & Conservation Service (October 2021) *Gooromon Grasslands Offset Management Plan 2018-2023*, Plan prepared for and on behalf of the ACT Government and Riverview (Final Version), [www.planning.act.gov.au/\\_data/assets/pdf\\_file/0008/2331926/gooromon-grasslands-offset-management-plan-2018-23.pdf](http://www.planning.act.gov.au/_data/assets/pdf_file/0008/2331926/gooromon-grasslands-offset-management-plan-2018-23.pdf), p. 3 (extract)

<sup>3</sup> SLA (online) *Ginninderry* (video), <https://suburbanland.act.gov.au/our-places/ginninderry>, viewed 9 May 26

<sup>4</sup> The EPBC Act approval granted to Riverview on 1 Sep 2017 was varied on 15 Nov 2024; The current approval is found here: <https://www.dccew.gov.au/sites/default/files/documents/sa024-variation-of-approval.pdf>

<sup>5</sup> SLA n 3

Approval covers the sub-divisions and the installation of utility services like power, water and sewerage, as well as the widening or construction of arterial roads.

The Ginninderry Approval was granted after a 'strategic assessment' process that distilled the actions Riverview want to take, and their conservation commitments. Public consultation on draft 'strategic assessment' and 'program report' documents occurred in 2016. Sometime later, Riverview submitted their revised documents to the DCCEEW. The final step in the assessment was the endorsement, by a delegate of the Federal Environment Minister, of Riverview's Program Report.<sup>6</sup> This report describes Riverview's entire Ginninderry development program, including the scope of planned actions and their impacts as well as its context, governance arrangements and Riverview's conservation commitments.

The Ginninderry Approval authorises Riverview to implement the endorsed Program Report. Riverview can carry out the development actions listed in the Program Report **on condition** they do the things they committed to do, in the Program Report, to avoid, mitigate and offset the impacts of their urban development program on Matters of National Environmental Significance (MNES) protected by the EPBC Act.

As noted above, Riverview's approved program includes extending Ginninderra Drive through Jaramlee NR ([Figure 1](#)). This is an action for which compensation is required because it will cause significant impacts that cannot be further avoided or mitigated on a population of GSM.<sup>7</sup> GSM is a MNES (the species is listed 'Vulnerable').<sup>8</sup>

Before Riverview can commence extending the road through Jaramlee NR, condition 7 of the Ginninderry Approval requires Riverview to establish a contiguous set of 'Golden Sun Moth Conservation Reserves' in accord with specific actions identified in the Program Report.<sup>9</sup>

Establishing nature reserves involves identifying, protecting and then managing habitat; here, however, we are focused on how Lot 2 is legally protected.

## Riverview's obligations to protect Lot 2

Condition 7 sets out the actions Riverview must undertake to protect Lot 2, i.e., Actions 2-4 in Table 4 of the Program Report.<sup>10</sup> Action:

2. 'vary the Territory Plan to establish the GSM Conservation Reserves while providing for Ginninderra Drive'
3. "purchase Lot 2 Wallaroo Road", Wallaroo, NSW (86.7 ha) (Lot 2 is identified in [Figure 1](#))
4. "apply a conservation covenant requiring the long term protection and enhancement of GSM habitat on Lot 2."

The Program Report also:

- states, 'whilst the covenant (at Action 4) will provide long term protection of Lot 2', "further investigations should occur for the potential to rezone" Lot 2 to what is now 'C3' zoning in NSW, 'Environmental Management'<sup>11</sup>

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<sup>6</sup> *Decision to endorse the Program Report: Notice* (18 Jul 2017), <https://www.dcceew.gov.au/sites/default/files/env/pages/f0e0261d-5c7f-4589-a0ec-c8879c09b7c2/files/sa024-endorsement-notice.pdf>; A T Adams Consulting n 1

<sup>7</sup> EPBC Act approval n 4, condition 7

<sup>8</sup> Department of the Environment (2026) *Synemon plana* in *Species Profile and Threats Database* (online), [www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon\\_id=25234](http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=25234)

<sup>9</sup> EPBC Act approval n 4, condition 7

<sup>10</sup> EPBC Act approval n 4, condition 7; A T Adams Consulting n 1, Actions 2-4 in Table 4, pp. 44-45

<sup>11</sup> A T Adams Consulting n 1, Action 4 on p. 45

- requires (at Action 5) that Riverview ‘prepare an offset management plan addressing the preservation and enhancement of GSM habitat’ in the GSM Conservation Reserves.<sup>12</sup>

As an aside, we note the establishment, protection and management of Jaramlee NR had already been required, i.e., prior to 1 Sep 2017, to offset the impacts on other GSM populations of two separate developments, the Lawson South residential development<sup>13</sup> and the Macgregor West 2 Estate.<sup>14</sup> This additionality issue is not considered further in this paper.

## Riverview’s performance against its obligations to protect Lot 2

Action 2 in Table 4 has been delivered in full. Although the ‘GSM Conservation Reserves includes Lot 2, both actions required relate to actions affecting land on the ACT side of the border, only. Both actions, i.e., the establishment of Jaramlee NR with a ‘nature reserve overlay’ and the establishment of a road reserve for the extension of Ginninderra Drive (Figure 1), were completed on 23 Oct 2015, almost two years before they were required.<sup>15</sup>

Action 3 in Table 4 has been delivered in full, i.e., NSW Real Property Records show Lot 2 was purchased by the SLA on 19 Nov 2015; again, almost two years before the purchase was required.

Although not mandatory, Action 4 also appears to have been delivered in full, i.e., it is understood that, on 23 Apr 2026, Lot 2 was rezoned C3.<sup>16</sup>

Actions 3 and 5 in Table 4 are considered together because they can be connected. Addressing point 5. first, the ACT Parks and Conservation Service has completed an offset management plan that explains how the whole of the ‘Gooromon Grasslands’, which includes the GSM Conservation Reserves and the Dunlop Nature Reserve<sup>17</sup>, will be protected and managed. Relevantly, this plan indicates Riverview would execute a Biodiversity Stewardship Agreement (a form of conservation covenant) with the NSW Biodiversity Conservation Trust over all of Lot 2.<sup>18</sup>

Against point 3, according to a report published by Riverview on 29 August 2025, no covenant has been executed and Riverview does not plan to execute one:

- As recently as 28 August 2024, Riverview provided assurance to the DCCEEW that the whole of Lot 2 would be protected with a covenant as required. The *Annual Compliance Report 2023 / 24: Ginninderry Project* states “Throughout the Program Report and the conditions of approval, Lot 2 Wallaroo Road is proposed to form part of the GSM

<sup>12</sup> EPBC Act approval, n 4, condition 8, read with: A T Adams Consulting n 1 Action 5 in Table 4, p. 45

<sup>13</sup> *Approval of Lawson South residential development*, see Conditions 12-13 of the approval granted on 13 Sep 2012, [https://epbcpublicportal.environment.gov.au/\\_entity/sharepointdocumentlocation/b69c65ea-9fb3-e11-983f-00224818ab04/2ab10dab-d681-4911-b881-cc99413f07b6?file=2010-5549-approval-decision.pdf](https://epbcpublicportal.environment.gov.au/_entity/sharepointdocumentlocation/b69c65ea-9fb3-e11-983f-00224818ab04/2ab10dab-d681-4911-b881-cc99413f07b6?file=2010-5549-approval-decision.pdf)

<sup>14</sup> *Approval of Macgregor West 2 Estate*, see Condition 2 of the approval granted on 8 Sep 2010, [https://epbcpublicportal.environment.gov.au/\\_entity/sharepointdocumentlocation/b627a1ec-4cb3-ec11-983f-00224818ab04/2ab10dab-d681-4911-b881-cc99413f07b6?file=approval.pdf](https://epbcpublicportal.environment.gov.au/_entity/sharepointdocumentlocation/b627a1ec-4cb3-ec11-983f-00224818ab04/2ab10dab-d681-4911-b881-cc99413f07b6?file=approval.pdf)

<sup>15</sup> *Planning and Development (Plan Variation No 351) Notice 2015* (NI2015-610), [www.legislation.act.gov.au/ni/2015-610](http://www.legislation.act.gov.au/ni/2015-610), p. 8

<sup>16</sup> This is based a reading of the Agenda, Attachments and Minutes of the meeting of the Yass Valley Council held on 23 Apr 2026, available at: Yass Valley Council (online) *Agendas and Minutes*, [www.yassvalley.nsw.gov.au/Our-Council/Council-Meetings/Agendas-and-Minutes](http://www.yassvalley.nsw.gov.au/Our-Council/Council-Meetings/Agendas-and-Minutes), viewed 7 May 2026

<sup>17</sup> Dunlop NR is visible the inset in Figure 2; it is enclosed by a black line in the northeast portion of the inset.

<sup>18</sup> ACT Parks & Conservation Service n 2, point 2 on p. 5

conservation reserves in its entirety ...” and, later, “while the covenant would cover the entire 86.8 ha site ...”.<sup>19</sup>

- By 29 August 2025 Riverview’s position had changed, dramatically:

The rezoning to C3 Environmental Management will provide for the long-term protection and enhancement of GSM habitat and is therefore considered a superior protection to that offered by a conservation covenant. The Project considers the rezoning will establish compliance with” Action 4, i.e., the requirement to protect Lot 2.<sup>20</sup>

## Discussion

We draw attention to two points. First, the suggestion a C3 ‘Environmental Management’ zoning is a superior protection mechanism compared to a Biodiversity Stewardship Agreement lacks credibility. The execution of a Biodiversity Stewardship Agreement (BSA) over Lot 2 would see it included in Australia’s National Reserve System; by contrast, a rezoning does not achieve this same standard. We doubt, had a BSA been executed over Lot 2, that the following could have occurred.

On 23 Apr 2026, Yass Valley Council resolved to adopt a planning proposal submitted by Riverview, and to amend Schedule 1 to its Local Environmental Plan, to rezone Lot 2 (as noted above) and **provide for the construction and operation of an electricity sub-station<sup>21</sup> in the middle of Lot 2, at roughly the centre of the set of contiguous nature reserves (Figure 2).**

Is Riverview – which is 60 per cent owned by the ACT Government – really going to construct an electricity sub-station in the middle of a Golden Sun Moth Conservation Reserve?

If so, what does that say about the future of every other environmental offset in the ACT? We hope that in this case that will not occur.

- We consider that constructing an electricity sub-station in the middle of the GSM Conservation Reserves would be inappropriate. Even if the patch upon which the sub-station may be constructed is degraded habitat, building on it will permanently remove the possibility of that potential habitat being restored.
- For GSM, fragmentation of habitat is a problem, i.e., connectivity is important. Male GSM are not thought to travel further than 200 metres, and females even less, so populations that are further than 200m apart are effectively isolated, with no migration. When these populations become isolated, they become genetically distinct, making them unique, and important to protect. If a population disappears from an area, it is unlikely to be recolonised.<sup>22</sup>

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<sup>19</sup> Riverview (28 August 2024) *Annual Report 2023-2024 Ginninderry Project*, <https://ginninderry.com/wp-content/uploads/2024/08/EPBC-Annual-Report-2023-2024.pdf>, pp. 20, 21, respectively.

<sup>20</sup> Riverview (29 August 2025) *Annual Compliance Report 2024 / 25 Ginninderry Project*, <https://ginninderry.com/wp-content/uploads/2025/09/250829-EPBCAnnualReport-FY24-25.pdf>, pp. 11-12

<sup>21</sup> Knight Frank Town Planning Sydney n 2, p. 6; Yass Valley Council (23 April 2026) Minutes, [https://yass.infocouncil.biz/Open/2026/04/CO\\_23042026\\_MIN\\_977.PDF](https://yass.infocouncil.biz/Open/2026/04/CO_23042026_MIN_977.PDF), p. 9

<sup>22</sup> Department of Agriculture, Water and the Environment (2021). *Conservation Advice for Synemon plana (Golden Sun Moth)*, [www.environment.gov.au/biodiversity/threatened/species/pubs/25234-conservation-advice-07122021.pdf](http://www.environment.gov.au/biodiversity/threatened/species/pubs/25234-conservation-advice-07122021.pdf), p. 7

Second, it appears Riverview’s plan to develop Lot 2 dates to *before* August 2021; that is the first evidence found revealing Riverview *received* a report on a desktop investigation exploring the option of developing Lot 2.<sup>23</sup>

- From Riverview’s annual reports to the DCCEEW, we find no evidence the DCCEEW would know of Riverview’s plan to develop this environmental offset.

As a second aside, we understand from Riverview’s reporting and can confirm it appears the endorsed Program Report approved for implementation includes no obligation for Riverview to even manage let alone restore the degraded section of Lot 2. It beggars’ belief Riverview proposed and the DCCEEW accepted a proposal to establish an offset site that proposes no management of an offset site.

## Abbreviations

Abbreviation	meaning ...
ACT	Australian Capital Territory
BSA	A Biodiversity Stewardship Agreement executed between a land owner and the NSW Minister responsible for the <i>Biodiversity Conservation Act 2016</i> (NSW) (s 5.5), noting this function may be delegated to a senior officer such as the Chief Executive of the NSW Biodiversity Conservation Trust
DCCEEW	Federal Department of Climate Change, Energy, the Environment and Water
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
Ginninderry	West Belconnen in the <b>ACT</b> and <b>NSW</b>
the Ginninderry Approval	The conditional approval granted to <b>Riverview</b> under Part 10 of the <b>EPBC Act</b> , which expires on 30 June 2067, authorising <b>Riverview</b> to implement the endorsed <b>Program Report</b>
GSM	Golden Sun Moth, <i>Synemon plana</i>
Jarramlee NR	Jarramlee–West MacGregor Grasslands Nature Reserve
Lot 2	Lot 2 DP 1144979 Yass, NSW with the street address Lot 2 Wallaroo Road, Yass Valley, NSW
MNES	Matters of National Environmental Significance
NSW	New South Wales
Program Report	The document, endorsed by a delegate of the Federal Environment Minister on 18 July 2017, that describes Riverview’s Ginninderry development program
Riverview	Riverview Projects (ACT) Pty Ltd
SLA	ACT Government’s Suburban Land Agency

<sup>23</sup> Capital Ecology (25 Aug 2021) *Ecological Values and Constraints Assessment for Lot 2 Wallaroo Rd, Wallaroo, NSW*, <https://apps.planningportal.nsw.gov.au/prweb/PRRestService/DocMgmt/v1/PublicDocuments/DATA-WORKA TTACH-FILE%20PEC-DPE-EP-WORK%20PP-2025-610!20250626T070508.457%20GMT>

## Attachment: Extracts from Riverview's documents

Golden Sun Moth, *Synemon plana* (GSM), are a medium-sized, day-flying moth that is listed as Vulnerable under both the EPBC Act and the *Nature Conservation Act 2014* (ACT).

The following is drawn (with references omitted) from the Strategic Assessment Report<sup>24</sup> and Program Report<sup>25</sup> documents upon which Riverview relied when it obtained its approval to proceed with the Ginninderry development, including the approval to extend Ginninderra Drive through Jaramlee NR.

Program Report, p. 11

### 3.0 The development

#### 3.1 Summary of actions

The program will provide for urban development and conservation at Ginninderry, including:

- ...
- A biodiversity offsets package for GSM which **will place an additional 86.8 hectare site (Lot 2)** supporting threatened species **into protected areas**; The site includes 11.9 ha of land currently occupied by GSM and 19.4 ha suitable for GSM, currently unoccupied.

Program Report, p. 38

### 4 MNES Impacts

#### 4.2 Threatened Fauna

##### Measures to offset impacts

Field research has confirmed the presence of a substantial population of GSM on a parcel of land in NSW adjacent to the ACT border and in close proximity to the Jarramlee reserve – Lot 2, which totals some 86.8 ha.in area (Figure 14 which is Figure 1 in this investigation report). ... The ACT Government has purchased this land to use it as an environmental offset against the impacts on 1.8 Ha of golden sun moth habitat that will be caused by the Ginninderra Drive extension. Lot 2 will be managed in combination with the West Macgregor and Jarramlee reserves as a single complex. The objectives of the existing reserves as well as those to be formulated for the additional site will be incorporated in the [management plan for Lot 2, discussed below]. There is potential for this offset area is rezoned as E3 Environmental Management as part of the overall NSW West Belconnen rezoning process.

SAR, pp. 66-67

### 3.3 Matters of National Environmental Significance

#### 3.3.1 EPBC Act Threatened Ecological Communities and Species

##### 3.3.1.5 Invertebrates

##### Golden Sun Moth, *Synemon plana* (GSM)

Historically, GSM occurred across approximately two million hectares of natural temperate grasslands in NSW, ACT, Victoria, and South Australia. Less than one percent of these temperate grasslands remain and populations of GSM are highly reduced and fragmented as a

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<sup>24</sup> Umwelt (March 2017) *West Belconnen Project Strategic Assessment: Strategic Assessment Report (the SAR)*, [www.dcceew.gov.au/sites/default/files/env/pages/f0e0261d-5c7f-4589-a0ec-c8879c09b7c2/files/sa024-strategic-assessment-report.pdf](http://www.dcceew.gov.au/sites/default/files/env/pages/f0e0261d-5c7f-4589-a0ec-c8879c09b7c2/files/sa024-strategic-assessment-report.pdf)

<sup>25</sup> A T Adams Consulting n 1

result. Presently, the species occurs in natural temperate grasslands and open grassy woodlands. Once considered to be restricted to only natural temperate grasslands dominated by more than 40 per cent coverage of wallaby grass, the species is now found to have a broader tolerance for other species compositions and has been recorded in exotic grasslands dominated by Chilean needle-grass (*Nassella neesiana*).

Conservation of GSM in the ACT was addressed first through 'Action Plan No. 7' (1998), then in a more integrated context through Action Plan 28. Since those Action Plans were prepared, the number of sites where GSM has been recorded in the ACT has increased substantially to over 70 sites.

Within the Ginninderry Project Area populations of GSM occur in the Jarramlee and Macgregor offsets, and have previously been recorded in the ACT land parcel block immediately to the west of Jarramlee (Block 1621, Belconnen) and adjacent NSW land.

Targeted surveys for GSM and basic habitat assessment were undertaken ... as part of the baseline studies for the Ginninderry project. These surveys considered the Jarramlee and Macgregor offsets in addition to the following three other parcels along the ACT-NSW border, all along Wallaroo Road to the north of the Project Area:

- Lot 1 DP 1144979 Yass, NSW;
- Lot 2 DP 1144979 Yass, NSW; and
- Block 48 Hall, ACT.

Surveys identified a patchy but widespread distribution of GSM based on the presence of flying males. Findings for the Jarramlee and Macgregor offsets were consistent with previous work and contemporary surveys undertaken concurrently by others. In addition to providing a high degree of confidence in the results, the surveys allowed for the first time a more complete understanding of the relative abundance of GSM on the Macgregor offset site. This has allowed for assessment from a consistent basis across all sites but importantly also on the Jarramlee offset site which had previously been based on an assessment of habitat as opposed to the presence of flying males.

The Ginninderra Drive extension will impact upon GSM in both the Jarramlee and Macgregor offsets. Assessment of this impact and management strategies associated with it are discussed [below].<sup>26</sup>

SAR, p. 91

#### *4.3 Mitigation Strategies*

##### *4.3.1 Conservation Corridor Reserve Management Plan*

###### *Mitigation strategies*

[Action 5 in Table 4 of the Program Report (below) requires Riverview to prepare a combined Offset Management Plan "addressing the preservation and enhancement of GSM habitat in Jarramlee and West Macgregor offset areas and Lot 2." This plan is to be incorporated into the Reserve Management Plan for the other impacts of urban development throughout Ginninderry, i.e., the 'Conservation Corridor RMP' required by condition 8 of the EPBC Act approval.]

The Conservation Corridor offset will be governed by the environmental management trust (EMT), which will be a skills based company with strong community representation and public

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<sup>26</sup> Umwelt n 24, pp. 66-67

and government accountability. The EMT will be responsible for the development, effective implementation, and the ongoing review of the Conservation Corridor RMP. Details of this management plan, the EMT structure, and funding for the Conservation Corridor are outlined in the Program Report. The EMT and RMP will cover all natural areas associated with the Program. These include the: ...

- Macgregor and Jarramlee offset areas; and
- proposed additional offset site to compensate for impacts to Jarramlee, West Macgregor, and MNES at Lot 2.

This will ensure that a holistic management approach is implemented with regards to dealing with conservation matters at landscape scale.<sup>27</sup>

Program Report, pp. 44-45

### 5 Outcomes and commitments for MNES

#### 5.1 Summary of conservation actions targeting MNES

Table 4: Conservation outcomes and actions for MNES (extract is as per the Program Report)<sup>28</sup>

Conservation outcome	Action	Responsibility	Timing
Golden Sun Moth			
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
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	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

<sup>27</sup> Umwelt n 24, p. 91

<sup>28</sup> A T Adams Consulting n 1, pp. 44-45

Conservation outcome	Action	Responsibility	Timing
	between Jarramlee and Dunlop Grasslands Reserve.		
	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.
	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, reviewed at intervals of no more than five years thereafter. GSM habitat area increase to be achieved prior to construction of Ginninderra Drive extension

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## 5 Outcomes and commitments for MNES

### 5.3 Avoidance and Mitigation Strategies

The plan will cover all of the land under the control of the EMT including the conservation corridor, the existing Jarramlee and Macgregor offset areas and the Lot 2 Wallaroo Road offset area.<sup>29</sup>

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<sup>29</sup> A T Adams Consulting n 1, p. 57