



SMEC INTERNAL REF. 30027\3002750_WHDD

Stakeholder Engagement
Report

William Hovell Drive Duplication

Client Reference No. 35484-NCT-200

Prepared for: Infrastructure Delivery Partners on behalf of Transport Canberra and City Services

13 April 2022

Through our specialist expertise, we deliver advanced infrastructure solutions for our clients and partners.

Leveraging our 70-year history of delivering nation-building infrastructure, we provide technical expertise and advanced engineering services to resolve complex challenges.

Through our network of global specialists collaborating with local partners, we connect you with the best teams and capabilities to deliver innovative and sustainable solutions.

We're redefining exceptional

Document Control

Document Type	Stakeholder Engagement Report
Project Title	William Hovell Drive Duplication
Project Number	30027\3002750_WHDD
File Location	X:\Projects\30027\3002750_WHDD\060 Communications\072 Stakeholder Engagement Report
Revision Number	01

Revision History

Revision No.	Date	Prepared By	Reviewed By	Approved for Issue By
01	13/04/2022	Simon Ferguson	Louise Bochner	Dan Keep

Issue Register

Distribution List	Date Issued	Number of Copies
Transport Canberra and City Services	18/03/2022	Issued Electronically
Infrastructure Delivery Partners	18/03/2022	Issued Electronically
Environment, Planning and Sustainable Development Directorate	13/04/2022	Issued Electronically

SMEC Company Details

Approved by	Dan Keep
Address	Level 9, 12 Moore Street, Canberra, ACT, 2601, Australia
Phone	+61 2 6234 1931
Email	dan.keep@smec.com
Website	www.smec.com
Signature	

The information within this document is and shall remain the property of:
Infrastructure Delivery Partners on behalf of Transport Canberra and City Services

Important Notice

This report is confidential and is provided solely for the purposes of demonstrating the stakeholder and community consultation in relation to the William Hovell Drive duplication project for Infrastructure Delivery Partners on behalf of Transport Canberra and City Services. This report is provided pursuant to a Consultancy Agreement between SMEC Australia Pty Limited (“SMEC”) and Infrastructure Delivery Partners on behalf of Transport Canberra and City Services, under which SMEC undertook to perform a specific and limited task for TCCS. This report is strictly limited to the matters stated in it and subject to the various assumptions, qualifications and limitations in it and does not apply by implication to other matters. SMEC makes no representation that the scope, assumptions, qualifications and exclusions set out in this report will be suitable or sufficient for other purposes nor that the content of the report covers all matters which you may regard as material for your purposes.

This report must be read as a whole. The executive summary is not a substitute for this. Any subsequent report must be read in conjunction with this report.

The report supersedes all previous draft or interim reports, whether written or presented orally, before the date of this report. This report has not and will not be updated for events or transactions occurring after the date of the report or any other matters which might have a material effect on its contents, or which come to light after the date of the report. SMEC is not obliged to inform you of any such event, transaction or matter nor to update the report for anything that occurs, or of which SMEC becomes aware, after the date of this report.

Unless expressly agreed otherwise in writing, SMEC does not accept a duty of care or any other legal responsibility whatsoever in relation to this report, or any related enquiries, advice or other work, nor does SMEC make any representation in connection with this report, to any person other than Infrastructure Delivery Partners. Any other person who receives a draft or a copy of this report (or any part of it) or discusses it (or any part of it) or any related matter with SMEC, does so on the basis that he or she acknowledges and accepts that he or she may not rely on this report nor on any related information or advice given by SMEC for any purpose whatsoever.

Glossary and Abbreviations

Term & Acronym	Description
BGW	Box-Gum Woodland
CEMP	Construction Environmental Management Plan
CH	Chainage
CHA	Cultural Heritage Assessment
CITES	<i>Convention on International Trade in Endangered Species of Wild Fauna and Flora 1975</i>
CoRTN	Calculation of Road Traffic Noise 1988
CSTM	Canberra Strategic Transport Model
CTMP	Construction Traffic Management Plan
DAWE	Commonwealth Department of Agriculture, Water and the Environment
DA	Development Application
DBD	Drake-Brockman Drive
EIS	Environmental Impact Statement
EP Act	<i>Environment Protection Act 1997</i>
EPBC Act	<i>Commonwealth Environmental Protection and Biodiversity Conservation Act 1999</i>
EPR	<i>Environment Protection Regulation 2005</i>
EPSDD	Environment, Planning and Sustainable Development Directorate
ESD	Ecologically Sustainable Development
GDE	Groundwater Dependent Ecosystem
GSM	Golden Sun Moth (<i>Synemon plana</i>)
IBRA	Interim Biogeographic Regionalisation of Australia
IDPG	Infrastructure Delivery and Partners Group
JGD	John Gorton Drive
KTP	Key threatening process
MNES	Matters of National Environmental Significance
NARcliM	NSW and ACT Regional Climate Modelling
NBN	National Broadband Network
NC Act	<i>Nature Conservation Act 2014</i>
PD Act	<i>Planning and Development Act 2007</i>
PAD	Potential Archaeological Deposit
Project	The duplication of William Hovell Drive between John Gorton Drive (formally Coppins Crossing Road) and Drake Brockman Drive. The duplication would include about 4.5km of new road, the signalling of the intersection at Drake-Brockman Drive, the upgrade of access to Old Weetangera Cemetery, the upgrade of underpass for the Bicentennial National Trail and the upgrade of vehicular access for Rangers to Kama Nature Reserve.
Project Site	The area to be directly affected by the Project, in this case, the portion of land within which construction and operation would occur
PTWL	Pink-tail Worm-lizard (<i>Aprasia parapulchella</i>).
RAO	Representative Aboriginal Organisation registered under the <i>Heritage Act 2004</i>
SHE	Statement of Heritage Effects
TCCS	Transport Canberra and City Services
TEC	Threatened Ecological Community
WHD	William Hovell Drive
WSUD	Water Sensitive Urban Design

Contents

Glossary and Abbreviations	v
Executive Summary.....	3
1. Introduction	6
1.1 William Hovell Drive duplication.....	7
1.1.1 Project background	7
1.1.2 Project benefits.....	7
1.1.3 Development approvals process.....	8
1.2 Scoping requirements for community and stakeholder consultation	8
1.3 Purpose and objectives of the engagement	8
1.4 Purpose and objectives of this report.....	8
1.5 IAP2 Spectrum and TCCS commitment to consultation	9
2. Stakeholder and community consultation	10
2.1 Scoping document	10
2.2 Pre EIS consultation	10
2.2.1 Stakeholder identification.....	11
2.3 Draft EIS approach	11
2.4 Draft EIS consultation	12
2.4.1 Public display.....	12
2.4.2 Community information drop-in sessions.....	12
2.4.3 Project information line and website	13
2.4.4 Information distribution.....	14
2.4.5 Targeted consultation	16
2.5 Legislative requirements.....	17
3. Issues raised/responses	18
3.1 Pre EIS issues.....	18
3.2 Submissions summary.....	18
3.3 YourSay summary	19
3.4 Community submissions/YourSay feedback.....	19
3.4.1 Agency submissions/responses	24
4. Conclusion / next steps.....	26
4.1 Changes to the Project.....	26
4.1.1 Shared path.....	26
4.1.2 Biodiversity	27
4.1.3 Noise.....	27
4.2 Design updates.....	28
4.3 Timeline.....	28
4.4 Conclusion.....	28

Appendices

Appendix A Submissions Response Table

Figures

Figure 1 - The engagement cycle.....	4
Figure 2 - WHD Timeline.....	6
Figure 3 - IAP2 Spectrum for Public Participation	9
Figure 4 - Copy of email that was sent to targeted stakeholders and community members.....	16

Tables

Table 1 - Stakeholder Identification Summary	11
Table 2 - Summary of Issues - Draft EIS Public/Community Groups	18
Table 3 - Summary of Issues - Draft EIS - Agencies	19
Table 4 - Summary of Community Issues and Responses	20
Table 5 - Summary of Agency Issues and Responses	24

Executive Summary

Introduction

Infrastructure Delivery Partners (IDP) on behalf of Transport Canberra and City Services (TCCS) propose to duplicate 4.5 km of William Hovell Drive between the intersections with John Gorton Drive (JGD) and Drake-Brockman Drive (DBD) in the districts of Belconnen and Molonglo Valley, Australian Capital Territory (the Project).

The Draft Environmental Impact Statement (EIS) for the Project and concurrent Development Application (DA) were placed on public exhibition between 5 July and 30 September 2021. During these periods, government agencies, interested stakeholders and the community were invited to make submissions on the Project to the Environment, Planning and Sustainable Development Directorate (EPSDD).

Additional community consultation on this project was undertaken from 8 November to 19 December 2021. Face to face stakeholder and community meetings occurred and feedback on the Project was encouraged via the ACT Government 'Your Say Conversation' online portal.

This Stakeholder Engagement Report (the Report) documents the issues raised in submissions received from the EIS exhibition period and the YourSay online feedback portal, as well as TCCS's response to these issues, and provides an update to the Draft EIS where there are changes to the Project.

Overview of submissions (Environmental Impact Statement Public Display)

A total of 20 submissions were received during the EIS exhibition period. These comprised 7 submissions from community members and non-government stakeholders and 13 from ACT Government authorities and agencies.

With respect to the ACT Government authorities and agencies submissions, a wide range of issues were raised based on the specific agency. The following key issues were raised:

- general comments regarding mitigation measures
- general comment regarding the need for ongoing consultation with entities
- ecological impacts including impacts to protected trees, impacts to threatened species, offset strategies, connectivity and fragmentation
- landscape and road design impacts
- request for additional heritage information
- impacts to utilities.

With respect to community and non-government submissions, the following key issues were raised in a number of submissions:

- shared path location and interaction with the off-leash dog park
- traffic noise, particularly in relation to noise modelling that informed the Road Traffic Noise Assessment (Appendix F of the Draft EIS)
- Lack of consultation with the community
- biodiversity impacts, particularly the loss of mature trees
- project construction impacts.

A more detailed breakdown of ACT Government authorities and agencies and community and non-government submissions is provided in Section 3.

Overview of feedback (YourSay)

- TCCS received submissions from community members and key stakeholders including the Belconnen Community Council, Conservation Council ACT and the ACT Equestrian Association.
- TCCS received 50 completed feedback forms, 15 emails and spoke to around 60 people at the pop-up sessions.
- The following key issues were raised:

- shared path location and interaction with the off-leash dog park
- traffic noise,
- biodiversity impacts,
- Bicentennial National Trail impacts

A more detailed breakdown of YourSay feedback is provided in Section 3.

Updates to the Draft EIS

This Report also outlines the updates to the Draft EIS and detailed design plans, in response to submissions from the community and key stakeholders.

The updates to the Project, which are described in greater detail in Section 4 of this Report, include:

- The alignment of the off-road shared path between DBD and the underpass adjacent to Hawker has been relocated to the western side of WHD (away from residences and the off-leash dog walking area).
- Following further discussions with the ACT Conservator of Flora and Fauna, additional measures will be implemented to facilitate movements of wildlife between The Pinnacle Nature Reserve and Kama Nature Reserve.
- Following community concerns regarding the Road Traffic Noise Assessment, TCCS has commissioned a peer review of the assessment completed in 2021, to confirm the adequacy of that assessment.

Stakeholder and Community Consultation

All issues and comments raised during consultation by the community, government agencies, and interest or stakeholder groups were recorded on a database. Various issues have then informed the proposal investigations and the ongoing design of the proposal. Figure 1 demonstrates this important cycle.

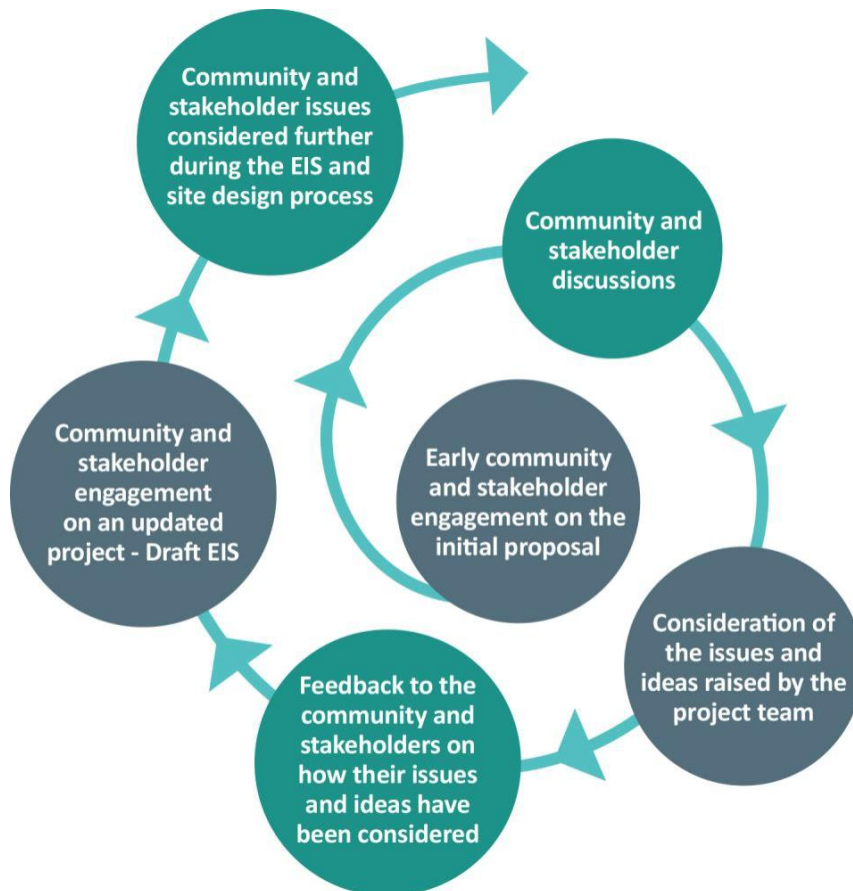


Figure 1 - The engagement cycle

Final summary

This Report presents updated details of environmental mitigation measures for the Project, which have been amended from the Draft EIS to address key issues raised in the submissions received. It reflects the proposed Project elements that have been amended since the exhibition of the Draft EIS.

1. Introduction

This document outlines the community and stakeholder engagement for the William Hovell Drive (WHD) Duplication. Transport Canberra and City Services (TCCS) propose to duplicate 4.5 km of WHD between the intersections with John Gorton Drive (JGD) and Drake-Brockman Drive (DBD) in the districts of Belconnen and Molonglo Valley, Australian Capital Territory (the Project).

The following timeline provides a summary of key dates and consultation activities:

Timeline



Figure 2 - WHD Timeline

This Stakeholder Engagement Report (the Report) includes:

- A description of the methodology and criteria for identifying stakeholders and how they were identified
- An outline of the communication methods used
- A copy of the information provided during the community consultation process
- A summary of the responses and the main comments raised
- A description on how concerns have been considered and addressed by TCCS
- An outline of the submissions received, issues raised in the submissions and a response to the issues and values identified.

1.1 William Hovell Drive duplication

1.1.1 Project background

The Project commenced in 2018 with a feasibility study to identify the feasibility of the duplication, and if appropriate, the preferred option for duplication. Following this, in 2020, funding was provided to progress the study through to full detail design including development approvals.

The Project is being undertaken to:

- improve the overall road alignment, capacity and safety
- reduce the rate of vehicular crashes
- relieve the morning and afternoon congestion between West Belconnen and the City, and
- promote active travel and support sustainable transport.

Initial consultation was undertaken by TCCS throughout the Preliminary Sketch Plan (PSP) Design Stage (January to November 2020) with relevant stakeholders and government agencies to inform the development of the proposal. The Planning and Development (William Hovell Drive Duplication – Molonglo Valley/Belconnen) Scoping Document 2020 (Scoping Document) outlined the matters to be addressed by the Draft Environmental Impact Statement (EIS), including the consultation requirements for the Project.

Detail design is currently underway and is being updated to consider factors, including stakeholder and community consultation.

The Project is jointly funded between the Australian Capital Territory (ACT) and Australian Governments as part of the Commonwealth's Investment Road and Rail Program.

1.1.2 Project benefits

The Project will support the growing regions of Molonglo Valley and West Belconnen including the new suburbs of Strathnairn and Macnamara. More than 20,000 vehicles per day travel on this section of road and this will increase as the area continues to develop. This project will improve safety for all road users with on-road cycle lanes and off-road shared paths included as part of the design work.

Key features of the Project include:

- Duplication of 4.5 kilometres of WHD to complete its duplication from the Glenloch Interchange through to DBD.
- A new three-metre wide asphalt off-road shared path along WHD between DBD and JGD.
- On-road cycle lanes in both directions.
- A new signalised intersection of DBD/Kingsford Smith Drive and WHD.
- Formalising access into the Old Weetangera Cemetery.
- Improving and enhancing the Bicentennial National Trail underpass and approaches.
- Construction of five architecturally designed retaining walls ensuring works remain within the road reserve and limit impacts on sensitive environmental areas.

1.1.3 Development approvals process

The Commonwealth Department of Agriculture, Water and the Environment (DAWE) determined that the Project is a controlled action requiring assessment and approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) before it can proceed. This EIS is being assessed by the ACT Government under the bilateral agreement between the Commonwealth and the ACT Government.

The EIS details the anticipated environmental impacts of the Project and to inform a Territory Impact Track Development Application (DA).

The Draft EIS and Impact Track DA were submitted to the Environment, Planning and Sustainable Development Directorate (EPSDD) as a concurrent EIS /DA process in July 2021.

1.2 Scoping requirements for community and stakeholder consultation

The ACT EPSDD state that under Chapter 8 of the *Planning and Development Act 2007* (PD Act), consultation must be undertaken with:

- Lease holders and land manager of land potential impacted by the proposal
- Any recreation groups which will be affected by the proposal
- Any volunteer conservation, landscape management or land care groups active in the area to be affected by the proposal
- The local community.

The consultation must:

- Describe the community consultation undertaken (methodology and criteria for identifying stakeholder and the communications methods used)
- Describe how concerns have been considered in light of the proposal and any future development planned
- The revised EIS must include the submissions received, issues raised in the submissions and a response to the issues and values identified.

1.3 Purpose and objectives of the engagement

The objectives of the community and stakeholder engagement were to:

- Create awareness of the Project
- Conduct an open and transparent public consultation and community involvement process
- Ensure that stakeholder and community feedback was included in the decision-making process during initial planning
- Ensure that stakeholder and community submissions in response to the DA and Draft EIS were responded to line with the ACT and Commonwealth legislative requirements
- Ensure that TCCS has responded to all matters of the Scoping Document relating to consultation.

1.4 Purpose and objectives of this report

The purpose of this Report is to fulfill the consultation requirements set out in the PD Act:

Section 221 (4) of the PD Act states that the revised EIS must:

- (a) address each matter raised in the scoping document for the development proposal; and
- (b) for any matter raised in a representation made within the public consultation period for the draft EIS—

- (i) address the matter; and
- (ii) demonstrate how the matter has been taken into account in the revised EIS.

1.5 IAP2 Spectrum and TCCS commitment to consultation

The approach to community and stakeholder consultation was guided by the International Association for Public Participation (IAP2), an international body providing best practice advice on engagement. The IAP2 Spectrum for Public Participation has become an often-used standard in Australia, that aims to ensure public participation is given a place in the proposal planning, design and delivery phases (see Figure 3). The IAP2 standard has been used by the ACT Government in describing consultation requirements.

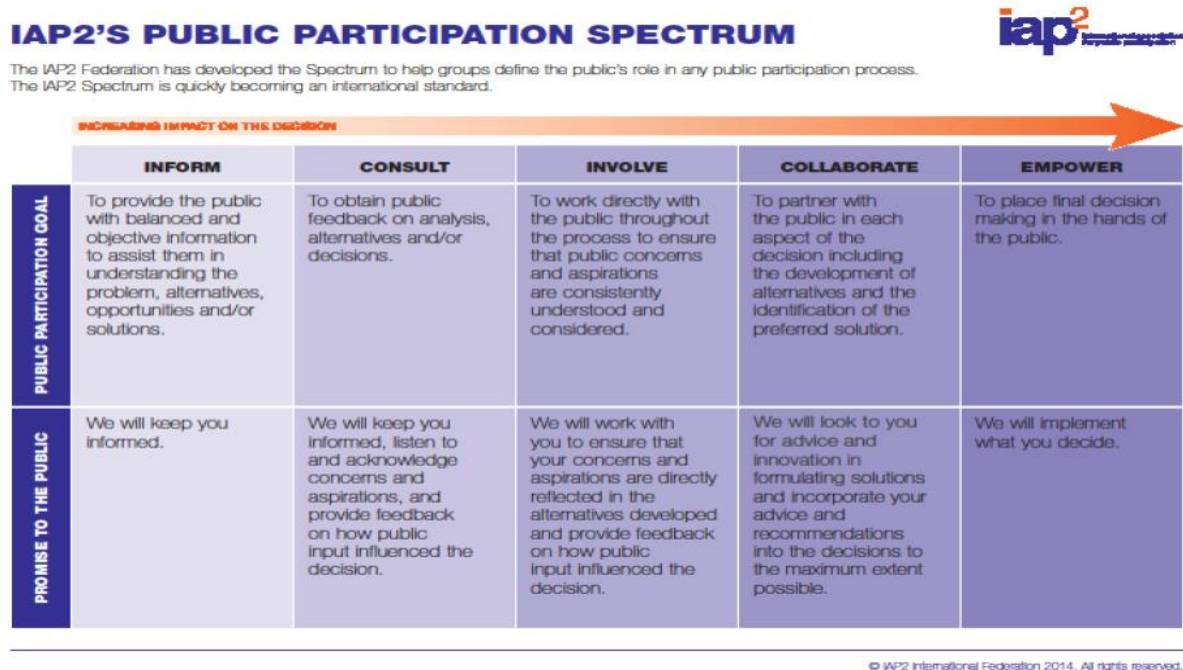


Figure 3 - IAP2 Spectrum for Public Participation

Source: International Association for Public Participation (IAP2): <http://www.iap2.org.au/>

Given the nature of the proposal, the community and stakeholder consultation activities were conducted in accordance with the 'inform', 'consult' and 'involve' level of the spectrum. In line with this level of participation, the goal for engagement was to provide stakeholders with clear information on the proposal, its current status and its potential impacts, and to listen to any concerns and obtain feedback for consideration in the development, design and progression of the Project, the Draft EIS and the revised EIS.

To achieve this goal, the following principles were established to guide the consultation program:

- Involving stakeholders shows respect for them. It recognises them as recipients and 'hosts' of the Project and allows them to have some ownership of the Project outcome
- Using engagement techniques that effectively and meaningfully engage all stakeholders
- Ensuring that all stakeholders have easy access to information about the Project
- Demonstrating that concerns and aspirations raised by the community and other stakeholders have been considered during the Project development, and
- Ensuring that all information is provided in plain English.

2. Stakeholder and community consultation

2.1 Scoping document

The Planning and Land authority (the Authority) within the EPSDD received the application under section 212(1) of the PD Act 2007 for Scoping of an EIS for the Project. Pursuant to section 212(2) of the PD Act, the Authority:

- a) Identified the matters that are to be addressed by an EIS in the relation to the development proposal; and
- b) Prepared a written notice (Scoping Document) of the matters

The Scoping Document identifies the consultation requirements for the Project:

9. Community and stakeholder consultation

The intention of the consultation in this scoping document is to ensure significant proposals include meaningful engagement with the community in the early stages of the project and provide clear expectations and an understanding of the actual development proposed. Consultation also provides an opportunity for the community to contribute in the design of the proposal and to resolve any major concerns early in the planning stages.

9.1. Consultation must be undertaken with:

- Lease holders and land managers of land potentially impacted by the proposal;
- Any recreational groups which may be affected by the proposal;
- Any volunteer conservation, landscape management or land care groups active in the area to be affected by the proposal;
- The local community, community groups, businesses owners and employees.

9.2. Consultation methods and documentation requirements:

- A variety of communication methods must be used to ensure all stakeholders are engaged appropriately, such as face to face, email/letters, community meetings and information sessions, digital/online tools and website notifications.
- A plain English statement explaining the proposal and conceptual drawings must be made available to the community and stakeholders during consultation.
- Consultation must occur as early as possible and avoid, or make allowances for public holidays, school holidays and the summer holiday (Christmas) shutdown period. The level of engagement must be comparable with the size, location and nature of the development and potential impact on the wider community.

9.3. Provide a consultation report that includes:

- A description of the methodology and criteria for identifying stakeholders and how they were identified. Details and plans must be provided showing potential impacts on the local and wider community to justify how stakeholders were identified.
- An outline of the communication methods used.
- A copy of the information provided during the community consultation process.
- A summary of the responses and the main comments raised. Evidence must be provided demonstrating that consultation has been undertaken with each relevant group/person.
- A description on how concerns have been considered and addressed. It must be identified where changes have been made to the proposal to account for community comments.

9.4. Consideration of public representations from Draft EIS notification.

The revised EIS must include a consultation report outlining the representations received, issues raised in the representations and a response to the issues and values identified. The summary response must clearly identify the representation(s) to which the responses relate

2.2 Pre EIS consultation

Initial consultation has been undertaken by TCCS throughout (PSP) Design Stage (January to November 2020) with relevant stakeholders and government agencies to inform the development of the proposal. Large open forum type community consultation did not occur due to the COVID restrictions and because there had not been confirmation of the construction funding. The consultation that occurred was also conducted to gain signature endorsing lodgement for EIS scoping processes.

2.2.1 Stakeholder identification

Early consultation with key stakeholders and ACT Government authorities and agencies has occurred since 2018, commencing with consultation on the Project Feasibility Study.

Throughout the period prior to exhibition of the Draft EIS a range of consultation sessions occurred with ACT Government authorities, agencies, and community groups. Briefings and discussions were held with a number of government entities and other stakeholders including the following:

Table 1 - Stakeholder Identification Summary

Stakeholder	Name
ACT Government PCS	TCCS (Various) EPSDD (Various) Conservator of Flora & Fauna ACT Heritage, EPSDD Shared Services ICT TCCS ITS & Signals Suburban Land Agency (Various)
Commonwealth Government	Dept of Agriculture, Water and the Environment
Utility Authorities	Icon Water Jemena Telstra Evo Energy iiNet / TPG NBN Optus
Landholders / Land Custodians	Suburban Land Agency (SLA) Parks and Conservation Service (PCS)
Local community and specialist groups	Bicentennial National Trail (BNT) ACT Equestrian Association Pedal Power

These meetings and consultation sessions raised a range of different issues which were identified and incorporated into the ongoing development of the Project throughout the design process.

TCCS also undertook regular contact with utility providers and established forums to encourage consultation.

2.3 Draft EIS approach

The Draft EIS in Section 6 outlined how the consultation would be undertaken.

Section 6.4 of the Draft EIS stated:

It would be envisaged that further stakeholder consultation would occur throughout the Detailed Design phase, including:

- **Dedicated Project website** – provide information about the proposal, project timing, purpose and the works to be undertaken and those carried out to date. The website will also provide project and traffic information during construction. TCCS currently have an information webpage on the project which can be found at <https://www.cityservices.act.gov.au/Infrastructure-Projects/woden-weston-creek-and-molonglo/william-hovell-duplication>
- **Social Media** – the TCCS Directorate will provide project updates using social media platforms, particularly during construction and any matters that may affect the traveling public.
- **Stakeholder consultation** - Stakeholders such as the Belconnen, Weston and Molonglo Community Councils will be targeted via drop-in sessions and presentations to the Community Councils. These will

allow the opportunity to provide direct feedback on the proposal as well as ask and answer any questions raised.

2.4 Draft EIS consultation

A Draft EIS and DA were lodged for the Project. The application number for the Draft EIS is EIS202000014 and the DA is DA202138722. The public consultation period for the concurrent application was 35 working days, commencing on 5 July 2021. The public consultation period was extended and closed on 30 September 2021. Within this period, the public could view the Draft EIS and provide written comments (a submission) on the proposal.

Additional community consultation on this project was undertaken from 8 November to 19 December 2021. Face to face stakeholder and community meetings occurred and feedback on the Project was encouraged via the ACT Government 'Your Say Conversation' online portal. The YourSay Conversations feedback portal closed at 11.59 pm Sunday 19 December 2021.

2.4.1 Public display

During the exhibition period the EIS was made available on the EPSDD website and was available for inspection upon request through Access Canberra Land, Planning and Building Services Shopfront at 8 Darling Street, Mitchell ACT 2911.

2.4.2 Community information drop-in sessions

During the YourSay feedback period, a series of community information drop-in sessions were held to allow the community to clarify the information presented in the EIS, as well as discuss other aspects of the Project with members of the project team. The information sessions provided information and graphic displays about the Draft EIS and also included other communication materials related to the project.

The community information drop-in sessions were held at the following times and locations:

- Belconnen Community Council, Tuesday 19 October 2021 (the PowerPoint presentation is available on the YourSay website, <https://yoursayconversations.act.gov.au/WHDDupgrade>)
- Kippax Fair, Saturday 27 November (for the wider community)
- Open space behind Hawker, Monday 29 November 2021 (for Hawker residents)
- Belconnen Community Council, Tuesday 14 December 2021 (presentation via Zoom).

The sessions were attended by various members of the TCCS Project team.

2.4.3 Project email and website

Email

The TCCS community engagement email has been available and maintained during project development to assist the community to provide their thoughts and comments on the project, to make enquiries and to discuss details of the proposal.

Project Website

The dedicated project website is:

<https://www.cityservices.act.gov.au/Infrastructure-Projects/woden-weston-creek-and-molonglo/william-hovell-duplication>

The consultation approach in relation to the website was discussed at section 2.3. In addition to the website providing information about the proposal, project timing, purpose and the works to be undertaken, the website has provided updates throughout the Draft EIS and revision periods.

The website contains maps, images and a video of the Project.

The website information includes:

- Project Description
- Key features
- Project background
- Noise studies
- Shared Path
- Environmental considerations
- Development approvals process, and
- A current update section.

YourSay Website

An additional website to the dedicated project website, specifically enabling community and stakeholder feedback is:

<https://yoursayconversations.act.gov.au/WHDDupgrade>

The 'YourSay' website contains project information, design details, a Project video, timeline, frequently asked questions, and a document library. It also has a 'follow' button, where interested parties can nominate to receive email updates on the Project. Importantly, during the consultation periods outlined in section 2.4, the 'YourSay' website enabled stakeholder, community members and any other interested parties to submit feedback via the online feedback portal. More recently, and in response to the trends becoming established from submissions, the 'YourSay' website has been updated to include a short 3 question survey in relation to the green space area next to Hawker and its usage.

The document library contains drawings, designs and plans including, but not limited to:

- William Hovell Drive Upgrade - design drawing
- Missing Link between Coulter Drive and Bindubi Street - design drawing
- William Hovell Drive Upgrade - design plan
- Missing link between Coulter Drive and Bindubi Street - design plan
- William Hovell Drive Upgrade between Drake-Brockman Drive and John Gorton Drive - design plan
- Point where the shared path crosses over William Hovell Drive - design plan
- Point where the shared path moves through the green space - design plan

The document library has been updated as further consultation develops and designs are updated.

The Frequently Asked Questions link on the 'YourSay' website contains information including, but not limited to:

- Active Travel
- Environment
- Noise
- Roads and Public Transport

- Construction

There are twenty-one questions and answers that go into depth about the Project design, approvals process, environmental and other studies, that occurred whilst drafting the revised EIS and the proposed construction timeframe. In addition, the Frequently Asked Questions section has been monitored and updated regularly in response to the submissions received and ongoing stakeholder and community consultation.

Department Website

[William Hovell Drive Duplication - Environment, Planning and Sustainable Development Directorate - Planning \(act.gov.au\)](#)

The Department Website detailed ways in which community members and stakeholders could make submissions on the Draft EIS during the exhibition period, including:

- Electronically using the [Public Submission Smartform](#)
- Email to ACEPDCustomerServices@act.gov.au
- Mail to Environment, Planning and Sustainable Development Directorate Customer Service, GPO Box 158, Canberra ACT 2601
- Hand to the Environment, Planning and Sustainable Development Directorate's Customer Service Centre at 480 Northbourne Avenue, Dickson

2.4.4 Information distribution

Letterbox drops

A targeted information letter was sent to Hawker residents closest to the Project, including an invitation to attend an onsite meeting on 29 November, 2021. Approximately 1500 letters were sent to all residential properties in Hawker.

Approximately 500 general information letters were sent to residences in Higgins and Scullin.

Emails

Targeted emails were sent out to identified stakeholders and community members on the day that the YourSay consultation period commenced, notifying them of the website and process for providing feedback. Figure 4 shows the email that were sent.

The following is a list of stakeholders and community members that were contacted:

Belconnen specific stakeholders

Aranda Residents' Group - arandaresidentsgroup@gmail.com;
 Belconnen Community Council - hello@belcouncil.org.au;
 Capital Region Community Services - (formerly Belconnen Community Service) contact@crccs.com.au;
 Charnwood Neighbourhood Watch - president@nhwact.com.au;
 Uniting Care Kippax - info@kippax.org.au;
 Florey Neighbourhood Watch - Florey@NHWACT.com.au;
 Florey Residents' Group - Floreyresidentsassociation@gmail.com;
 Giralang Residents' Action Group - Giralang.residents.action.group@gmail.com;
 Macgregor and Holt Neighbourhood Watch - macgregor-holt@nhwact.com.au;
 Melba and Spence Neighbourhood Watch - melbaspence@nhwact.com.au;
 Scullin Community Group - scullincommunitygroup@gmail.com;
 SPARK - enquiries@ginninderry.com;

Woden/Weston Creek/Molonglo stakeholders

Coombs and Wright Neighbourhood Watch - coombs@nhwact.com.au;
 SLA Mingle - Mingle@act.gov.au;
 Weston Creek Community Council - info@westoncreek.org.au;
 Woden Community Service - info@wcs.org.au;
 Woden Valley Community Council - info@wvcc.org.au;
 Molonglo Valley Community Forum - info@mvcommunityforum.org.au

General stakeholders

ATSIEB - atsieb@act.gov.au;
Conservation Council - info@conservationcouncil.org.au;
Gungahlin Community Council - president@gcc.asn.au;
Inner South Community Council - info@isccc.org.au;
North Canberra Community Council - secretary@northcanberra.org.au;
Tuggeranong Community Council - info@tuggeranong.org.au;

Roads and active travel stakeholders

ACT Equestrian Association - cflawrence@hotmail.com.au;
ACTVETS Cycling Club - ianmcvay@grapevine.com.au;
AusCycling - neil.skipper@auscycling.org.au;
Austroads gallan@austroads.com.au;
Canberra Cycling Club John.warren@bigpond.com.au;
Living Streets Canberra livingstreetscanberra@gmail.com;
Pedal Power 1 - executiveofficer@pedalpower.org.au;
Pedal Power 2 - communications@pedalpower.org.au;
Public Transport Association of Canberra - chair@ptcbr.org;

Environmental stakeholders

ACT Landcare - admin@landcareact.org.au;
ACT Urban Woodland Rescue - acturbanwoodlandrescue@gmail.com;
Birdscaping CBR - palethorpe1@gmail.com;
Canberra Environment Centre - info@canberraenvironment.org;
Friends of ACT Trees - scholto@inet.net.au;
Ginninderra Catchment Group - landcare@ginninderralandcare.org.au;
Southern ACT Catchment Group - info@sactcg.org.au;
Friends of Grasslands - info@fog.org.au;
Friends of Pinnacle Nature Reserve - fotpin@fotpin.org.au; convenor@fotpin.org.au;
Friends of Mount Painter - friends.of.mount.painter@gmail.com;
Friends of Hawker Village - secretary@friendsofhawkervillage.com;

Community members

TCCS sent targeted emails to members of the community that had sent in submissions or emails prior to the 8th November 2021. Due to privacy reasons the full name of email recipients cannot be spelled out in full.

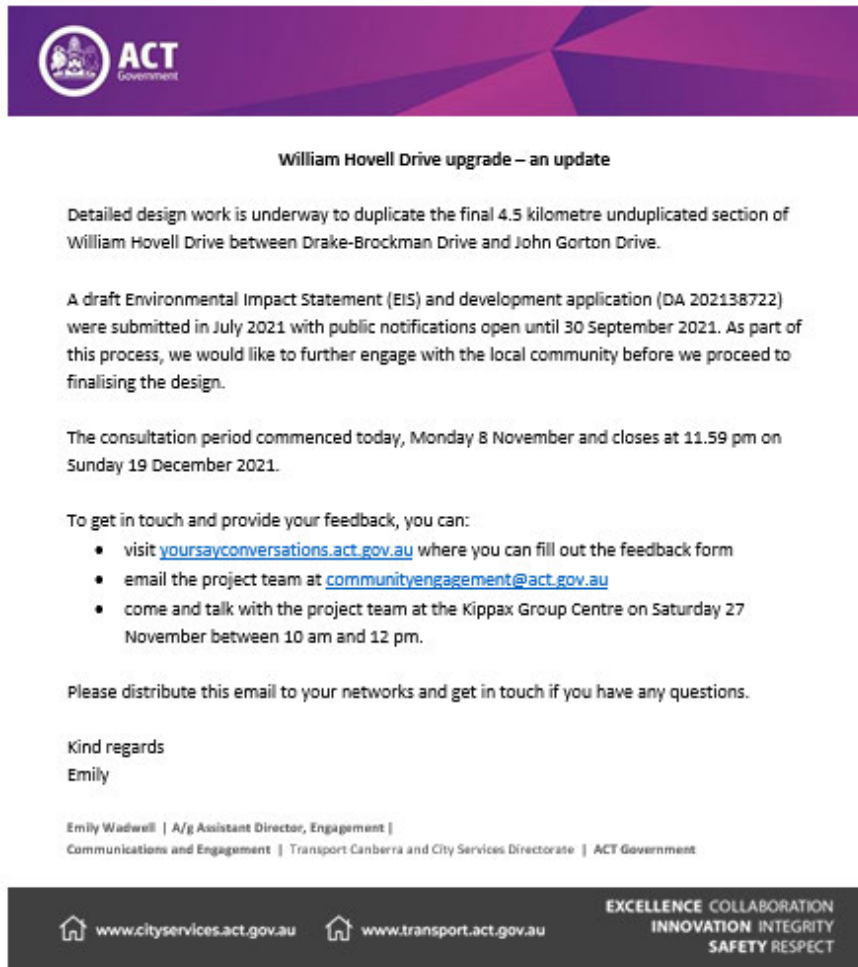


Figure 4 - Copy of email that was sent to targeted stakeholders and community members

2.4.5 Targeted consultation

Targeted consultation occurred after submissions started to evidence trends in the issues and concerns from impacted stakeholders.

Noise

Many of the Hawker residents voiced concerns that the Project had not addressed noise impacts adequately, as the noise monitoring was conducted during a quieter traffic period that coincided with COVID 19 lockdowns and a long weekend. TCCS responded to residents' concerns and organised a peer review of the original Road Traffic Noise Assessment (Appendix F of the Draft EIS) to confirm its adequacy. The peer review of the Noise and Vibration Assessment was undertaken by WSP Australia – a worldwide professional engineering consultancy service.

The noise model produced by SLR (noise consultant) established existing noise levels (2020), target noise levels in accordance with the *Roads ACT Noise Management Guidelines* (TCCS, 2018) and predicted maximum noise levels for the Project during a 2031 design scenario.

The study undertook noise monitoring during the 2020 COVID-19 pandemic. However, the actual traffic volumes did not modify the outcome of the assessment. The purpose of undertaking noise monitoring is to establish the model which then uses traffic volume data that has been collected by TCCS over previous years and predicted future traffic volumes. This unattended noise monitoring was undertaken at two locations from Friday 24 April to Tuesday 5 May 2020. While these locations are not adjacent to the residential areas, they are adjacent to the road and are used to setup the modelling.

The noise monitoring data was then put into a computer generated 3D noise model of the current road alignment and surrounds. While traffic volumes were lower than normally experienced, the actual traffic volumes used for the purpose of model calibration are not relevant to the outcome of the Study. The purpose of the 3D noise model is to 'calibrate' the project model and to understand how noise travels in the area.

As explained in Section 5.5 in the revised EIS, the Calculation of Road Traffic Noise 1988 (CoRTN) methodology was utilised to calculate existing road traffic noise at the noise monitoring locations and to predict future road traffic noise levels on land adjacent to the upgraded WHD alignment. This calibrated noise model was then used to establish project noise criteria at all nearby receptors based on "normal" 2020 traffic volumes, and then modified with the proposed upgraded alignment to determine what the road noise levels would be in 2031 under full traffic volumes for that year. As a result, the noise levels in the study represent noise generated by existing traffic volumes on a normal weekday, and the assumed traffic volumes for 2031.

This noise model was validated and verified for use in the assessment. This methodology was confirmed with TCCS – Infrastructure Planning as acceptable.

A number of noise mitigation measures are proposed to reduce traffic noise experienced at residences (refer to Section 5.5 in the revised EIS).

Shared path

Feedback during the Draft EIS and DA phases, indicated there were concerns from the local community about the alignment of the shared path adjacent to the residential properties at Hawker. The main issues related to the way in which the proposed shared path interacted with the dog-off leash recreation area, the close proximity of the path to the residential properties and associated noise, safety and amenity impacts and proposed vegetation removal.

As a result, TCCS organised targeted information sessions including a community drop in information session at the impacted green space behind Hawker (dog off leash area) on Monday 29 November 2021.

Following community consultation, a revised alignment of the shared user path has been developed to relocate the path (between Drake Brockman Drive and the underpass near the Old Weetangera Cemetery) to the western side of WHD. This alignment is discussed more in Section 4 and will be available for review with the revised EIS.

Biodiversity

There were many comments on the Draft EIS relating to biodiversity loss and offset strategies. TCCS has held numerous meetings with the Offsets Working Group at EPSDD, to clarify many of the concerns raised. Consultation with the Office of the Conservator for Flora and Fauna has been ongoing and consistent throughout the Project.

Community concerns were also raised regarding the spread of weeds (especially African Lovegrass) within the locality, habitat loss, loss of mature Eucalypts, the need to offset BGW, and replanting.

The main issues and responses are discussed in further detail in Section 3 and Section 4.

2.5 Legislative requirements

Under section 220 (2) of the PD Act, the planning and land authority must—

- (a) make a copy of the representation available on the authority website
- (b) give a copy of the representation to the proponent of the development proposal as soon as practicable after the public consultation period for the draft EIS ends.

TCCS understands that any matters raised in submissions made during the public consultation period must be addressed in the revised EIS for consideration by the Authority. Submissions received after public consultation closes may be provided by authority to TCCS for their consideration. Section 3 has summarised the submissions received and TCCS responses. Appendix A documents all submissions received during the Draft EIS exhibition period and TCCS responses.

3. Issues raised/responses

3.1 Pre EIS issues

During initial consultation, some meetings, and issues raised, by the stakeholders and community included:

ACT Government

- MS Teams and in-person discussions and meetings with the EPSDD, Conservator Liaison Officer and ACT Government Ecologists to discuss strategies for the minimisation of the project footprint, specifically around areas of potential connectivity between nature reserves on both sides of the road.
- MS-Teams and in-persons discussions with ACT Parks and Conservation Service regarding vehicular access into The Pinnacle and Kama Nature Reserves.
- MS Teams meetings with the Suburban Land Agency regarding the urban interface with the new suburb of Whitlam.

ACT Residents and Community Groups

- Telephone conversations with interested Hawker residents to provide general project information (via Access Canberra).
- Telephone and email discussions with The Uniting Church in Australia (ACT Synod) regarding the access and parking requirements for the Old Weetangera Cemetery.
- An in-person meeting, email and telephone discussions with ACT Equestrian Association with regard to the interface with the Bicentennial National Trail (BNT).
- Email communication with ACT Pedal Power to provide project details and request their feedback.

All concerns were either addressed or raised with the project manager for further discussion. Insight was gained into matters that concerned or interested stakeholders and this insight informed future consultation throughout the course of the Project.

Section 6.5 of the Draft EIS provided a table that outlined the issues raised in consultation.

3.2 Submissions summary

The following tables provide an insight into the number of times certain issues were mentioned by community members (Table 2) and agencies (Table 3) in the submissions received during the Draft EIS exhibition period.

The full submissions response table is located at Appendix A of this Report.

Table 2 - Summary of Issues - Draft EIS Public/Community Groups

Issue	Subcategories	Approximate mentions	Total
Traffic	Noise	6	14
	Congestion	3	
	Safety	5	
Shared Path	Biodiversity	3	8
	Project Design	5	
Public Domain	Recreation	3	4
	Public Access	1	
Biodiversity	Re-Vegetation	4	15
	Weed Control	4	
	Offsets/Mitigation	3	
	Other Impacts	3	
Consultation		5	5
Wording of EIS		1	1

Table 3 - Summary of Issues - Draft EIS - Agencies

Issue	Subcategories	Approximate mentions	Total
Traffic	Noise	3	6
	Congestion	1	
	Safety	2	
Biodiversity	Re-Vegetation	3	35
	Weed Control	1	
	Mitigation/Offsets	8	
	Corridors	6	
	Other Impacts	5	
	Connectivity	12	
	Wording of EIS		
Aboriginal Heritage		5	5
European Heritage		5	5
Project Design		3	5
Water	Water Quality	4	5
	Groundwater	1	
Contamination		6	6
Climate Change		6	6

3.3 YourSay summary

Feedback from the YourSay feedback portal was received primarily from local residents and those who regularly use the recreational corridors alongside WHD (the green space in Hawker as well as the two nature reserves).

TCCS received submissions from key stakeholders including the Belconnen Community Council, Conservation Council ACT and the ACT Equestrian Association.

TCCS received 50 completed feedback forms. 54% of those who filled out the feedback form told TCCS they use the green space located between the back of Hawker and WHD. Of those who use it, 80% are there for exercise/informal sport with 32% making use of the off-leash dog area.

The majority of respondents were in the 35-54 age group (50%).

In addition to the feedback forms, TCCS received 15 emails and spoke to around 60 people at the pop-up sessions.

3.4 Community submissions/YourSay feedback

The following table provides a summary of community submissions and feedback received during the Draft EIS exhibition period and the YourSay consultation period, along with TCCS responses.

Note: The comments/issues raised section has been summarised and paraphrased. The full submissions response table is located at Appendix A of this Report. The YourSay 'What we heard' report contains a more detailed summary of the YourSay feedback and it attached at Appendix B.

Table 4 - Summary of Community Issues and Responses

Comment/Issues Raised	TCCS Response
Shared Path	
<ul style="list-style-type: none"> Alignment 	
The majority of feedback from the community was in relation to the proposed location of the shared path. There was support for moving the path further away from the dog off-leash area and Hawker residences.	Following community consultation, a revised alignment of the shared user path has been developed to relocate the path (between Drake-Brockman Drive and the underpass near the Old Weetangera Cemetery) to the western side of William Hovell Drive. This alignment will be available for review with the revised Draft EIS. This will not impact on the shared dog off-leash area.
The shared path should be further from the road.	<p>The cycle path is generally located outside the clear zone required for the speed zone nominated on WHD; however, if it is within this distance, it is protected by a roadside safety barrier, that is approved and rated to protect from vehicles collisions.</p> <p>The alignment of the shared path was optimised to make the path as safe as possible, whilst minimising environmental impact. By pushing the shared path further away from the road in numerous places, required extensive cut batters that would then impact additional vegetation (including the nature reserves) as well as crossing property boundaries.</p> <p>The shared path designed is designed to be safe and in accordance with Australian Standards and Road Design Guidelines. If the shared path is close to the road, it is separated by road safety barriers.</p>
<ul style="list-style-type: none"> Bicentennial National Trail (BNT) 	
ACT Equestrian Association expressed concern about the Bicentennial National Trail being disrupted by the shared path location.	In order to deconflict the BNT with the shared user path, TCCS has commenced the process of relocating the BNT through the adjacent rural property to minimise interaction on the shared user path between equestrians and other users. The short section interaction on the shared zone, through the underpass, will be regulated with appropriate signage.
The ACT Equestrian Association strongly objects to the shared path being routed through the Lands End underpass.	Mitigation measures are being incorporated into the Project to make the alignment safe for horse riders, horses, cyclists and pedestrians. Advisory signage will be installed to address these issues.
ACT Equestrian Association and the local BNT Section Coordinator expressed strong concern about the lack of consideration given to the safety of horse riders, and even walkers, having to share the underpass and its approaches with fast moving bicycles.	Fencing adjacent to the path on the eastern approach to the underpass will be removed, as will some vegetation to improve sight lines into the underpass. Signage will be installed to instruct both horse riders and cyclists to dismount before crossing through the underpass. Signage will also be installed to instruct pedestrians or cyclists to remain outside the underpass if it is already occupied by a horse. Safety mirrors will be installed at the bends in the path.
ACTEA requests that the shared path be moved in its entirety to the eastern verge of William Hovell Drive.	Due to the various constraints from different parts of the project, having the Shared Path on the western side of WHD in this location is deemed the most appropriate solution.
<ul style="list-style-type: none"> Tree removal/impacts 	
The shared path should not impact the mature native trees that provide amenity for humans and habit/food for native species.	The alignment of the shared path is such as to minimise impact on roadside vegetation, particularly mature and significant trees. The relocation to the western side of WHD adjacent to Hawker will further minimise impact.

Concern about the shared path design requiring tree removal.	Following community consultation, a revised alignment of the shared user path has been developed to relocate the path (between DBD and the underpass near the Old Weetangera Cemetery) to the western side of WHD. This alignment means that fewer mature trees will need to be removed in the area between the underpass near the Old Weetangera Cemetery and DBD. There will be some tree removal required, however replacement planting will occur.
<ul style="list-style-type: none"> Width of Path/Design 	
Comments wanting to keep it as flat as possible without steep rises so younger and older can ride it easily	The shared path has been designed in accordance with appropriate standards and guidelines. Steeper areas have landing areas included as required.
Please make it wide enough for people to comfortably pass each other	The nominated three-metre wide shared path is in accordance with the ACT Design Standards, and also in accordance with the Austroads technical guidelines (the peak organisation of Australasian road and transport agencies).
<ul style="list-style-type: none"> Drainage 	
Pay attention to drainage. Too often paths are built and then when it rains, it becomes a floodway or water flows across it, which makes it hazardous and prone to damage.	The design includes allowance for shared paths. The Shared path has a constant crossfall, with a small drain at the edge to catch the water and direct it to a stormwater drainage system.
Once the shared path moves below the grade of the widened road, drainage becomes critical to maintaining traction, especially as this path will allow clear runs at decent speed.	All drainage requirements, including sediment control will be in place for the shared path construction. This will include the underground drainage of any flow paths of drainage lines.
Traffic	
<ul style="list-style-type: none"> Signalisation of the DBD intersection 	
The need to signalise the intersection of DBD was queried with some respondents believing it to be unnecessary with the potential to negatively impact traffic flow.	The assessment of traffic at the WHD/DBD intersection has included both roundabout options (current size and an increased / upgraded roundabout) as well as signals. Due to the increase in traffic by 2031, the existing roundabout layout will cause excessive delays, particularly in the morning peak. A larger roundabout with 2 x continuous lanes and exit/turn lanes was considered for the 2031 traffic scenario, as was signals. Both of these options provide acceptable wait times for vehicles; however, the roundabout has a significantly larger construction footprint and environmental impact. Additionally, the continuous flow of a roundabout provides a deterrence for active travel as it is difficult for pedestrians and cyclists to find a gap in traffic. The signals were chosen as they meet the design criteria, minimise the environmental impact and promote safe, active travel.
<ul style="list-style-type: none"> Congestion 	
Concerns that the road duplication would increase traffic volumes and congestion in the local area and on the wider Canberra Road network.	<p>One of the Project objectives is to address existing traffic congestion within this section of WHD, being the only unduplicated portion. It will also support future residential development in the Molonglo Valley and West Belconnen. This is achieved by the additional capacity of the duplicated road.</p> <p>The Project will not generate any traffic, according to traditional traffic generation methodologies. However, the upgrade will result in a redistribution of traffic across the Canberra road network and may also lead to a small increase in traffic volumes due to the relatively lower congestion and easier road travel. This increase on traffic</p>

	should be accompanied by a reduction in traffic volumes across other arterial and lower order roads in Belconnen.
Noise	
<ul style="list-style-type: none"> Traffic Noise 	
Local residents were interested in noise mitigation and the noise monitoring undertaken to date with a desire to see noise monitoring undertaken during a period more reflective of 'normal' traffic conditions.	<p>A Noise and Vibration Assessment (the Study) was undertaken as part of the Draft EIS process. The Study was undertaken using current ACT guidelines and specifications by a specialist contracting firm. The contractor is fully accredited and experienced in working in the ACT. The Study undertook noise monitoring using traffic volumes taken during the project as well as historical data from the surrounding road network. This provided a base for normal 2020 traffic noise and then was used to model what the road noise levels would be in 2031 under full traffic volumes. Any future noise levels above the required standard were identified and noise mitigation measures are proposed to lower these to an acceptable level.</p> <p>Submissions have prompted a peer review assessment of the Road Traffic Noise Assessment, which has been undertaken by WSP Australia Pty Ltd (WSP). This includes a noise logger at the back of the Hawker houses. The new Noise and Vibration Assessment will be compared against the original and may inform design updates or amendments.</p>
Residents concerned about noise levels, in particular close to the Hawker residential area.	As per ACT Noise Management Guidelines, road construction projects need to provide mitigation where the noise impact is above certain criteria and thresholds. For the WHD Project, the required mitigation is likely to be noise reducing asphalt in parts of the project.
Access to Kama Nature Reserve	
Requests for a parking area in the Kama Nature Reserve	<p>With WHD to be duplicated, public access directly off this arterial road to the Kama Nature Reserve is not considered a safe option.</p> <p>Public access directly off this arterial road to the Kama and Pinnacle Nature Reserves was not considered to be a safe option, as the William Hovell Drive road corridor will gradually hold increasing volumes of traffic under a 2031 design scenario. It is understood that Parks and Conservation will work with TCCS to ensure a new Whitlam access point into the Kama Nature Reserve is provided for the future.</p>
Concern regarding the removal of public access to the unsealed and informal carpark on the eastern side of WHD with no current alternate access to the Kama Nature Reserve.	<p>With WHD to be duplicated to carry more traffic, public access directly off this arterial road to the Pinnacle Nature Reserve is not considered a safe option.</p> <p>Public access directly off this arterial road to the Kama and Pinnacle Nature Reserves was not considered to be a safe option, as the William Hovell Drive road corridor will gradually hold increasing volumes of traffic under a 2031 design scenario. It is understood that Parks and Conservation will work with TCCS to ensure a new Whitlam access point into the Kama Nature Reserve is provided for the future.</p>
Biodiversity	
<ul style="list-style-type: none"> Wildlife corridors 	
A number of pieces of feedback referenced the importance of wildlife corridors so wildlife could move freely and safely between the two nature reserves.	<p>Liaison with the Office of the Conservator for Flora and Fauna has identified measures to reduce impacts on the wildlife corridor between the two nature reserves.</p> <p>A range of measures have been proposed and include: keeping the overall road width as narrow as possible between the two nature</p>

	reserves, including a number of fauna crossings for arboreal and avifauna, have the road batters designed to allow kangaroos and wallabies to escape the roadway and back into the nature reserves, having fencing directing wildlife to the underpass, have culverts designed to be used by turtles and other wildlife.
<ul style="list-style-type: none"> • Tree planting 	
New trees should be a variety of local and endemic native trees with a focus on wildlife and pollinators.	There is a landscaping plan detailed for this project, especially in areas where there is minimal vegetation currently. Proposed trees are native, and are either Casuarina Cunninghamiana, or one of 6 x different species of Eucalyptus.
<ul style="list-style-type: none"> • Biodiversity loss 	
There was strong support for ensuring the alignment of the road and the shared path minimised impact to and loss of trees and native vegetation	The road alignment and widening has been designed to have the least impact on adjacent trees, particularly mature and significant trees that provide fauna shelter and habitat. The alignment of the shared path has also been adjusted to minimise the impact on vegetation, particularly mature trees, where possible.
Concerns about construction impacts to Kama and the Pinnacle nature reserves and their flora and fauna.	<p>Protection of the two nature reserves during construction and minimising any ongoing impacts was identified early as a key priority of the project.</p> <p>The project team has had meetings with the Office of the Conservator for Flora and Fauna and EPSDD environmental officers to incorporate design measures to maintain the wildlife corridor.</p> <p>Prior to construction a Construction Environment Management Plan will be required and be approved by the Environment Protection Authority and other Government environmental agencies.</p> <p>Protection measures for the two nature reserves will include the erection of man proof fencing, treatment of drainage lines with sediment control, installation of sediment basins and a strict 'No Entry' during construction. Any other requirements from the EPA and other Government agencies will also be implemented.</p>
<ul style="list-style-type: none"> • Offsets 	
Various comments questioning the offset strategy, asking further detail on amount of vegetation removal, and whether it offsets were confirmed.	The amount of vegetation which will be impacted has been mapped and categorised. Generally, for native species, there will be an impact to 6.5 hectares of Grassy Woodland and 4.5 hectares of planted natives. The project will also remove nine hectares of exotic grasslands. Full details of this are available in the Biodiversity Impact Report. The development of a biodiversity offset strategy is being undertaken in parallel to the completion of the EIS.
Consultation	
Concerns of inadequate consultation with the local community	<p>The Draft EIS at section 6.2 identified the specific stakeholder groups relevant to the project for consultation purposes.</p> <p>The Draft EIS at section 6.3 outlined the consultation that had been undertaken in the initial stages of the project, being the scoping work and design, as it developed and in respect of specific matters.</p> <p>The concurrent public exhibition of the Draft EIS and associated DA provides the community and stakeholders an opportunity to consider the project in its entirety and provide submissions.</p> <p>Initial public notification of the Draft EIS and DA commenced in 5 July 2021 and closed on 30 September 2021. An additional period of</p>

	<p>community consultation was held from 8 November to 19 December 2021.</p> <p>The broader community engagement undertaken for the Draft EIS and DA exhibition included a 'YourSay' webpage about the project, targeted and general letters to residents of adjacent and nearby suburbs, onsite meeting with residents, popups information sessions at Kippax and Hawker, and presentation to the October Belconnen community council meeting.</p>
<p>Concerns regarding the lack of technical details and detailed drawings / plans during the YourSay engagement.</p>	<p>Technical drawings are not easily understood by the wider community. The overarching plans that were put together were intended to be read in conjunction with the written information provided. The YourSay website has links to www.planning.act.gov.au where the Draft EIS and appendices can be viewed in their entirety.</p>

3.4.1 Agency submissions/responses

The following table provides a summary of agency submissions and emails received during the EIS notification period, along with TCCS responses.

Note: The comments/issues raised section has been summarised and paraphrased. The full submissions response table is located at Appendix A of this Report.

Table 5 - Summary of Agency Issues and Responses

Comment/Issues Raised	Response
Heritage	
<ul style="list-style-type: none"> Aboriginal Places 	
<p>ACT Heritage Council - The Final EIS must consider if drainage and revegetation works, and electrical infrastructure works will cause damage to Aboriginal places PAD1, WHD1</p>	<p>The project design has been reviewed and revised so that there is no impact to existing Aboriginal places PAD1 or WHD1.</p>
<ul style="list-style-type: none"> Weetangera Cemetery 	
<p>ACT Heritage Council - The Final EIS must consider the proposed drainage and access works near the Cypress trees that are part of the Weetangera Cemetery in more detail</p>	<p>In response to ACT Heritage Council comments, the project footprint has been reviewed and design optimised so that there is a minimal amount of impact to the Tree Protection Zone (a specified area around a tree trunk to provide for the viability and stability of the tree), as detailed in Australian Standard "AS 4970-2009 Protection of trees on development sites".</p>
<ul style="list-style-type: none"> Potential impacts to the Kama Woodland/Grassland 	
<p>ACT Heritage Council - Queried if the project would diminish the heritage significance of the Kama Woodland/Grassland, and if so the Final EIS must also describe how these impacts will be avoided, minimised and mitigated.</p>	<p>Following review from the Heritage specialist, due to the small amount of impact to the Kama Woodland, there is no significant impact or decrease in heritage values resulting from the impacts within the road reserve.</p>
Biodiversity	
<ul style="list-style-type: none"> Biodiversity corridors and movement 	

<p>Conservator of Flora and Fauna - Further discussion is required as to why a land bridge can't be implemented connecting Kama and the Pinnacle as an offset measure</p>	<p>Provision of a fauna bridge at this location is planned for consideration under a Future Feasibility Study. Further investigations must be undertaken to demonstrate the additional benefit of this structure in the context of additional land clearing being required to support it.</p> <p>In the meantime, TCCS remains committed to continuing its engagement with the Conservator regarding establishment of a direct offset for the Project as its first choice of offset (most likely west of the Kama Nature Reserve). TCCS also remains committed to the establishment of two box culvert and one rope bridge fauna crossings.</p>
<p>Conservator of Flora and Fauna - If a land bridge is not a viable option for connectivity, then two suitable culvert structures will be required to fitted out for wildlife access.</p>	<p>TCCS remains committed to providing two box culverts and a rope bridge to support a range of ground dwelling and arboreal/avifauna safely crossing the road, in addition to the installation of additional wildlife fencing to help reduce the instances of roadkill along this section of the road corridor.</p>
<ul style="list-style-type: none"> Offset management 	
<p>Conservator of Flora and Fauna - Further details are required on the proposed offset site to the west of Kama Nature Reserve, including number of hectares, specific location, management and Public Land/IUCN reserve status</p>	<p>TCCS and SMEC have met with the Conservator and agreed a pathway forward to achieving a Draft Offset Strategy and final Offset Management Plan for the Project. This is based on the first choice of offset being located to the west of Kama Nature Reserve. Offsets would cater to Box Gum Woodland, Hoary Sunray, Pink-tailed Worm-lizard, Superb Parrot and Striped Legless Lizard (recognised Matters of National Environmental Significance under the Environment Protection and Biodiversity Conservation Act 1999). A Biodiversity Offset Strategy will proceed in parallel to the EIS process.</p>
<ul style="list-style-type: none"> Light Spill 	
<p>Conservator of Flora and Fauna raised concerns about light spill into the Kama and Pinnacle nature reserves.</p>	<p>Throughout the design process, a light spill assessment has been conducted to determine the amount of light that extends into the Nature Reserves. The light spill assessment shows that minimal light above the level of full moonlight will extend into the Nature Reserves. Consultation with the ACT Conservator of Flora and Fauna has been undertaken to resolve this issue.</p>
<ul style="list-style-type: none"> Mitigation measures 	
<p>Conservator of Flora and Fauna - Numerous comments were provided on mitigation measures for environmental impacts.</p>	<p>All of the comments were addressed, and changes have been made to the revised EIS wording. Refer to Appendix A – Submissions Response Table, for each mitigation measure response.</p>
<ul style="list-style-type: none"> Risk Assessment 	
<p>Conservator of Flora and Fauna - The comments proposed that Table 4.4 'Risk assessment' in the Draft EIS required reconsideration of some elements</p>	<p>All of the comments were addressed, and changes have been made to the revised EIS wording. Refer to Appendix A – Submissions Response Table, for each response to the Risk Assessment comments/issues raised. Many of the comments have been adopted into the revised EIS wording.</p>
<p>Traffic Noise</p>	
<p>TCCS commented on the current and future modelling for noise reducing road surfaces. They suggested that consultation ought to occur between Road Maintenance/TCCS over their future resurfacing options.</p>	<p>The Draft EIS as section 5.5.4.2 identifies that operational noise management measures including the low noise road pavement surface are to be investigated. Due to the additional environmental impact from noise walls, noise reducing asphalt pavement has been included in the updated design.</p>
<p>TCCS questioned the effectiveness of open graded mixes (OGM) and their added maintenance costs. TCCS believed that noise walls are more effective in noise reduction, and recommended further analysis.</p>	<p>The Draft EIS as section 5.5.4.2 identifies that operational noise management measures including the low noise road pavement surface are to be investigated. Due to the additional environmental impact from noise walls, noise reducing asphalt pavement has been included in the updated design.</p>

Utilities	
Various comments were made by Utilities providers, and very of a general nature.	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
Water quality and stormwater management	
Conservator of Flora and Fauna and Infrastructure Projects commented on water quality protection provisions - Concerns were raised about stormwater management during the construction phase and Water Sensitive Urban Design (WSUD), in particular in relation to Deep Creek Pond.	Following the Draft EIS, drainage design has been updated and modified, with additional treatment to drainage channels. The resulting assessment of water quality meets the required WSUD targets.
Climate Change	
Climate Change Policy – comments relate to the scope requirements for an EIS to consider the emissions reduction targets of the ACT, to support your final assessment.	Emissions reduction targets have been reviewed and updated commentary included in the Revised Draft EIS.

4. Conclusion / next steps

4.1 Changes to the Project

Based on feedback from the stakeholder and community consultation to date, numerous design changes have been made to the Project and the revised EIS has been updated to address the changes made to the Project. Ongoing investigations and designs will continue to be finalised until design completion. Hence the report cannot definitively report on the 100% detailed design of the Project, as this will be developed after the revised EIS is submitted. The main issues and areas of concern, that have received attention from TCCS are discussed below.

4.1.1 Shared path

Feedback during the Draft EIS and DA phases, indicated there were concerns from the local community about the alignment of the shared path adjacent to the residential properties at Hawker. The main issues related to the way in which the proposed shared path interacted with the dog-off leash recreation area, vegetation removal and the close proximity of the path to the residential properties with associated noise, safety and amenity impacts.

As a result, TCCS held a conversation online and face to face from Monday 8 November to Sunday 19 December 2021. The online engagement was via a feedback form and live question and answer forum on YourSay. The focus of the feedback form was on the proposed alignment of the shared path due to the commentary received from the community querying its location.

This information session, along with received submissions and ongoing consultation, has informed Project design changes.

There were three new routes suggested as part of the consultation. The consensus was for a new proposed route of the shared path being on the western side of WHD between DBD and the underpass near Old Weetangera Cemetery in Hawker. The shared path will now run alongside the cemetery access road and will not impact the Old Weetangera Cemetery. To avoid conflict with the equestrian path / users, TCCS have commenced the process to realign the equestrian path. The equestrian path will have a new route to the west. The revised EIS provides for both an onroad cycle path in addition to an off-road shared user path. The shared path begins and ends at intersections.

Overall, this updated shared path alignment avoids unnecessary impacts to mature vegetation, with impacts being limited to only what is reasonably required to deliver this infrastructure. It also means the shared path can function alongside this Major Road without safety concerns.

4.1.2 Biodiversity

The approach to minimising fragmentation, improving connectivity and reducing the incidence of roadkill events that is being incorporated into the Project's design is:

- One fauna crossing (rope bridge) to assist arboreal and avifauna to safely cross the road reserve
- Two fauna crossings (box culverts) to assist ground-dwelling fauna to safely cross the road reserve. These will be designed to be used by various wildlife
- Some road batters will be laid back to allow Kangaroos and Wallabies to escape the roadway and back into the Nature Reserves. However, exclusion fencing (1.8 m tall chainmesh fence with floppy top feature) will be included on each side of WHD in the vicinity of the Nature Reserves, extending at least 200m past the fauna crossings. This will assist in reducing the risks to native and non-native fauna from being injured or killed by road traffic. It will also improve the safety of road users by decreasing the risks of vehicle collision with large fauna species. The effectiveness of this exclusion fencing will be monitored during the operational stage of the Project.

TCCS and SMEC have met with the Conservator and agreed a pathway forward to achieving a Draft Offset Strategy and final Offset Management Plan for the Project. Whilst it will be advantageous to nominate the offset area close to the Project, this is not an absolute requirement. Therefore, the first choice of offset location is to the west of the Kama Nature Reserve. This area holds additional advantages, as it includes further connectivity along the Molonglo River, both further into the ACT and north-west towards the NSW border. A Biodiversity Offset Strategy will be progressed in parallel with the Revised Draft EIS.

4.1.3 Noise

In addition to the updated SLR Road Traffic Noise Assessment (refer to Appendix F), SLR's original 2020 assessment was also peer reviewed by WSP under a separate engagement from the ACT Government. WSP's Peer Review methodology included the following:

- Undertaking unattended noise monitoring between 8 and 23 February 2022 to quantify the existing road traffic noise levels and support the validation of the developed road traffic noise prediction model. This noise monitoring was carried out in accordance with Australian Standard AS 1055:2018 Acoustics, Description and Measurement of Environmental Noise (Standards Australia, 2018) and Australian Standard AS 2702:1984 Acoustics – Methods for the Measurement of Road Traffic Noise (Standards Australia, 1984). The locations monitored were:
 - 13 Florina Place, Hawker
 - 16 Mainoru Place, Hawker
 - Whitlam Development
- Noise loggers were installed with microphone height at 1.5 metres and for the two properties in Hawker, at a distance of 1 metre from the most exposed building façade, between 8-23 February 2022
- A road traffic noise prediction model was thereafter created using the SoundPLAN software package (version 8.2) implementing the Calculation of Road Traffic Noise (CoRTN, UK Department of Transport, 1988) method. This model was used by WSP in their Peer Review to predict road traffic noise generated by the assessed roads within the study area for the following scenarios:
 - Year 2022, measurement year, for current road traffic noise prediction and model validation. (supported by noise monitoring and concurrent traffic classification counts at three locations in February 2022)
 - Year 2031, 'built' scenario referring to assessment scenario when the project is constructed and operational, for predicted horizon noise levels to be used for mitigation specification
 - Year 2031, 'no built' scenario referring to the assessment year without the project but with the existing roads only.

Whilst there are some minor differences, in part due to the time difference in noise and traffic readings used, the findings between the WSP Peer Review commissioned by TCCS and the SLR Road Traffic Noise Assessment (refer to Appendix F of the EIS) are generally consistent, despite no additional noise monitoring being undertaken as part of the

updated SLR Road Traffic Noise Assessment (refer to Appendix F of the EIS). That is, both the SLR and the WSP assessments found there to be 10 properties adjacent to WHD (from the DBD roundabout to approximately 750m south of this roundabout), which have predicted noise levels in 2031 up to 4dB higher than the criteria/target threshold.

Furthermore, both SLR and WSP assessments are consistent in that the inclusion of a noise reducing pavement (such as Open Graded Asphalt) in this area will reduced the predicted 2031 noise levels to within the criteria/target threshold.

As such, open Graded Asphalt will be included in this portion of the WHDD Upgrade to reduce the predicted 2031 noise levels to within the criteria / target threshold.

4.2 Design updates

The following has been reviewed and designs updated based on consultation:

- Fauna crossings
- Shared user path between DBD and the underpass near the Old Weetangera Cemetery

4.3 Timeline

The EPSDD may re-notify the revised EIS to allow a second round of comments. The next steps for the Project and indicative timeframes are:

- Finalise community engagement including 'What We Heard'
- Finalise the Noise Report IV
- Submit revised EIS
- EPSDD review the revised EIS
- Revised EIS may be re-notified
- If Revised EIS is re-notified, then submissions and comments will be evaluated and addressed
- The DA assessment will commence using the revised EIS
- The Notice of Decision to be handed down following assessment of the Revised EIS and the DA.

4.4 Conclusion

TCCS has engaged with stakeholder and community members extensively since the inception of the Project and continues to work through issues raised. The extensive consultation has resulted in numerous design changes which are expected to mitigate many of the stakeholder and community concerns.

TCCS has addressed all matters that were raised in section 9 of the Scoping Document.

This Report will be an appendix to the revised EIS and has:

- described the methodology and criteria for identifying stakeholders and how they were identified
- outlined the communication methods used
- provided copies of information distributed during the community consultation process
- summarised responses and the main comments raised
- described how concerns have been considered and addressed, and
- described how comments have led to Project changes

The consultation process has evidenced thorough engagement with stakeholders and community members and the issues raised have been afforded due consideration, resulting in significant updates to the Project design. The main concerns pertaining to the shared path alignment, dog off-leash area and biodiversity impacts have been addressed.

Appendix A Submissions Response Table

Response to Public Comments on Draft EIS - EIS202000014

Person	Comment		Proponent Comment
<p>██████████ ██████████</p>	<p>Section 6.3 of the draft EIS document indicates no large open forum community consultation has been undertaken due to COVID restrictions and no confirmation of construction funding. As construction funding has recently been announced with the Federal Government and there are now no impeding COVID restrictions may I suggest the Proponent can now proceed with public consultation. Possible suggestions include a display at the Hawker shops, a community forum and at least a letter box drop of residents directly affected by the proposal.</p> <p>Section 6.4 indicates targeted discussions with specific stakeholders only and not residents. May I suggest the Proponent engage more directly with affected residents during the draft EIS and DA phase rather than just specific stakeholders. Engagement in the detailed design phase once the DA & EIS are approved is too late.</p> <p>A representation on this matter which should also be referred to has been provided on the DA.</p>	#1	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p> <p>The webpage for the Project and Exhibition of the EIS provided an overview of the project and its key features, and response to frequently asked questions on the topics of active travel, environment, noise, roads and public transport and construction. The web page also provided basic design plans of the project.</p>
<p>██████████ ██████████</p>	<p>The Draft Environmental Impact Statement (EIS) prepared for William Hovell Drive Duplication has several issues which need to be satisfactorily addressed before the EIS is accepted. The issues are:</p> <p>1. Poor noise monitoring methodology and inconsistencies in the outcomes proposed for the treatment of noise.</p>	#2	<p>The operational Road Traffic Noise Assessment undertaken for the EIS by SLR consultants is stated as to have been undertaken in accordance with the Roads ACT Noise Management Guidelines (EIS section 5.5). The noise monitoring survey approach is outlined in section 5.5.1 of the EIS.</p> <p>The consultant is accredited with the Association of Australasian Acoustical Consultants (AAAC) and the author of the Study has more than 20 years' experience of road traffic noise assessment and substantial experience in working in the ACT and is a full member of the Australian Acoustical Society (AAS).</p> <p>Many of the Hawker residents had concerns that the Project had not addressed noise adequately, as the noise monitoring was conducted during a quieter traffic period that coincided with COVID 19 lockdowns and a long weekend. TCCS responded to resident concerns and organised a peer review of the original Road Traffic Noise Assessment (Appendix F of the Draft EIS). In addition to the peer review, a peer review of the Noise and Vibration Assessment was undertaken by</p>

Person	Comment	Proponent Comment
		<p>WSP Australia – a worldwide professional engineering consultancy service.</p> <p>There have been noise concerns raised from residents at the Hawker end of the project footprint. Submissions have prompted a peer reviewed assessment of the Road Traffic Noise Assessment. The peer review did not identify any issues with the Road Traffic Noise Assessment.</p> <p>The noise model produced by SLR (noise consultant) established existing noise levels (2020), target noise levels in accordance with the Roads ACT Noise Management Guidelines (TCCS, 2018) and predicted maximum noise levels for the Project during a 2031 design scenario.</p> <p>The study undertook noise monitoring during the 2020 COVID-19 pandemic. However, the actual traffic volumes did not modify the outcome of the assessment. The purpose of undertaking noise monitoring is to establish the model which then uses traffic volume data that has been collected by TCCS over previous years and predicted future traffic volumes. This unattended noise monitoring was undertaken at two locations from Friday 24 April to Tuesday 5 May 2020. While these locations are not adjacent to the residential areas, they are adjacent to the road and are used to setup the modelling. The separation of the noise monitors from residential areas will result in more accurate vehicle noise readings from WHD only, and not affected by other roads / sources, or affected by interference with noise transmission (e.g buildings), associated with the residential area.</p> <p>The noise monitoring data was then put into a computer generated 3D noise model of the current road alignment and surrounds. While traffic volumes were lower than normally experienced, the actual traffic volumes used for the purpose of model calibration are not relevant to the outcome of the Study. The purpose of the 3D noise model is to ‘calibrate’ the project model and to understand how noise travels in the area.</p> <p>As explained above, the Calculation of Road Traffic Noise 1988 (CoRTN) methodology was utilised to calculate existing road traffic noise at the noise monitoring locations and to predict future road traffic noise levels on land adjacent to the upgraded WHD alignment. This calibrated noise model was then used to establish project noise</p>

Person	Comment	Proponent Comment
		<p>criteria at all nearby receptors based on “normal” 2020 traffic volumes, and then modified with the proposed upgraded alignment to determine what the road noise levels will be in 2031 under full traffic volumes for that year. As a result, the noise levels in the study represent noise generated by existing traffic volumes on a normal weekday, and the assumed traffic volumes for 2031.</p> <p>This noise model was validated and verified for use in the assessment. This methodology was confirmed with TCCS – Infrastructure Planning as acceptable.</p> <p>It is important to note that, while the noise monitoring period took place during COVID restrictions, resulting in lower than ‘normal’ numbers of vehicles on the road, this will also mean that the noise levels of the road will be below ‘normal,’ and therefore show a greater difference (i.e. a worse outcome) when the additional noise generated from the Project is added to it. Were the noise monitoring undertaken during ‘normal’ road traffic conditions, the impact of the Project on top of these background noise levels could actually appear less significant when interrogated through modelling software.</p> <p>This approach is therefore considered to be consistent with the Precautionary Principle within the concept of Ecologically Sustainable Development, which is defined in Section 9 of the P&D Act as follows:</p> <p style="text-align: center;"><i>the precautionary principle means that, if there is a threat of serious or irreversible environmental damage, a lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.</i></p> <p>This requirement to follow the precautionary principle is also reiterated in Section 3A of the EPBC Act.</p> <p>A number of noise mitigation measures are proposed to reduce traffic noise experienced at residences (refer to Sections 5.5.4 and 7 of the EIS).</p> <p>This text has also been added to Section 6.2.6 of the EIS.</p>

Person	Comment		Proponent Comment
<p>██████████ ██████████</p>	<p><i>The Draft Environmental Impact Statement (EIS) prepared for William Hovell Drive Duplication has several issues which need to be satisfactorily addressed before the EIS is accepted. The issues are:</i></p> <p>2. No information on the traffic impact of the duplication on the wider road network.</p>	#3	<p>The Project is to address existing traffic congestion within this section of William Hovel Drive, being the only unduplicated portion. It will also support future residential development in the Molongo Valley and West Belconnen. This is achieved by the additional capacity of the duplicated road.</p> <p>Recognition of implications to the wider road are given in Appendix C Transport Impact Assessment in sections 4 and 8 which notes the increase in capacity of this arterial road may reduce “east-west rat-running through Hawker, Weetangera, Cook and Aranda.” (section 4.1 page 20 and sections 8.2 and 8.3 page 27).</p> <p>The following is provided in Section 5.1.3 of the EIS:</p> <p style="padding-left: 40px;"><i>According to the Transport Assessment the Project will not generate any traffic, according to traditional traffic generation methodologies. However, the upgrade will result in a redistribution of traffic across the Canberra road network and may also lead to a small increase in traffic volumes due to the relatively lower congestion and easier road travel. This increase on traffic should be accompanied by a reduction in traffic volumes across other arterial and lower order roads in Belconnen.</i></p>
<p>██████████ ██████████</p>	<p><i>The Draft Environmental Impact Statement (EIS) prepared for William Hovell Drive Duplication has several issues which need to be satisfactorily addressed before the EIS is accepted. The issues are:</i></p> <p>3. Insufficient justification for the recommended design and alignment of off-road shared path in the reserve adjacent the Hawker residential estate.</p>	#4	<p>Given the submissions by residents who were concerned about proximity of shared path to residents and the conflict of dog off leash area, further community consultation was undertaken in December 2021 (refer to the Stakeholder Engagement Report which is now provided as Appendix J to the EIS). The webpage for the Project and Exhibition of the EIS provided an overview of the project and its key features, and response to frequently asked questions on the topics of active travel, environment, noise, roads and public transport and construction. The web page also provided basic design plans of the project.</p> <p>There were three new routes suggested as part of the consultation. The consensus was for a new proposed route of the shared path being on the western side of William Hovell Drive. The shared path will</p>

Person	Comment	Proponent Comment
		<p>run alongside the cemetery access road and will not impact the old Weetangera Cemetery.</p> <p>To avoid conflict with the equestrian path / users, another equestrian path is being built. The equestrian path will have a new route to the west.</p> <p>Following community consultation, a revised alignment of the shared user path between Hawker and Drake-Brockman Drive has been relocated to the western side of WHD (between Drake Brockman Drive and the underpass near the Old Weetangera Cemetery). This alignment is available for review with the revised Draft EIS.</p> <p>The revised EIS now provides for both an onroad cycle path in addition to an offroad shared user path. The shared path begins and ends at intersections.</p> <p>The alignment of the shared path was optimised to make the path as safe as possible, whilst minimising environmental impact. By pushing the shared path further away from the road in numerous places, required extensive cut batters that would then impact additional vegetation (including the nature reserves) as well as crossing property boundaries.</p> <p>The shared path designed is designed to be safe and in accordance with Australian Standards and Road Design Guidelines (the nominated 3 metre wide shared path is in accordance with the ACT Design Standards, and also in accordance with the Austroads technical guidelines (the peak organisation of Australasian road and transport agencies)). If the shared path is close to the road, it is separated by road safety barriers. Additionally, there will be a much small interface between cyclists and the offleash dog area which greatly improves safety for shared path users. Moreover, the shared user path caters for pedestrians as well as cyclists that are not overly confident.</p>

Person	Comment	Proponent Comment
		<p>The proposed location on the western side of WHD will mean that there is a small environmental impact and few trees being, particularly in the area between the underpass near the Old Weetangera Cemetery and Drake-Brockman Drive. There will be some tree removal required, however replacement planting will occur.</p> <p>The shared path not only provides access for residents of Hawker and Higgins along WHD and to the Nature Reserves, but it also provides a path for residents of suburbs such as Whitlam that wish to travel north.</p> <p>The shared path remains within the road reserve and so does not take on additional land which has not been designated for roads and related road infrastructure uses. The shared path runs for the extent of the project, continuing through to Bindubi Street to provide for a missing link in the current path network between Higgins and City. Whilst the suburb of Whitlam is still being developed, the path will also connect with that area.</p> <p>Fencing adjacent to the path on the eastern approach to the underpass will be removed, as will some vegetation to improve sight lines into the underpass. Signage will be installed to instruct both horse riders and cyclists to dismount before crossing through the underpass. Signage will also be installed to instruct pedestrians or cyclists to remain outside the underpass if it is already occupied by a horse. Safety mirrors will be installed at the bends in the path.</p> <p>The alignment of the Bicentennial National Trail will be changed so that only a small section of the Bicentennial National Trail will coincide with the shared user path. At this location, there will be extensive signage and safety mirrors, as well as the removal of fencing that may</p>

Person	Comment	Proponent Comment
		<p>provide the feeling of being trapped for horses as they are being ridden along the pathway.</p> <p>With regards to the timing of the provision of this shared path infrastructure, there may be some parts of the shared path that may be able to be constructed before the road, however other parts of the shared path will not be able to be constructed early as they required retaining walls to be constructed as part of the main road project, and require significant fill material, much of which will be won from the construction project itself.</p> <p>Public access to the Kama Nature Reserve remains open off WHD and will continue to be open until roadworks on WHD require the permanent closure of this access point. With WHD to be duplicated to carry more traffic, public access directly off this arterial road to the Kama Nature Reserve is not considered a safe option.</p> <p>Parks and Conservation will work closely with TCCS to ensure a new Whitlam access point into the Kama Nature Reserve is available before access off WHD is closed to the public. It is acknowledged that more visitation into the Kama Nature Reserve is inevitable given the development nearby. Parks and Conservation will address the need for upgrades of the track network in the coming year.</p> <p>The design of the new access point in Whitlam has as yet not been finalised so no details are available. However, these will be shared on the Parks website once they are ready for public viewing. The exact timing of the new access point from Whitlam is also as yet unknown but will be communicated via the Parks website as soon as it is known.</p> <p>Refer to Sections 2.4 and 6.2.6 of the EIS.</p>

Person	Comment		Proponent Comment
<p>██████████ ██████████</p>	<p><i>The Draft Environmental Impact Statement (EIS) prepared for William Hovell Drive Duplication has several issues which need to be satisfactorily addressed before the EIS is accepted. The issues are:</i></p> <p>4. Lack of meaningful public consultation with the local residents as required by Section 9.1 of the scoping document.</p>	#5	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p> <p>The webpage for the Project and Exhibition of the EIS provided an overview of the project and its key features, and response to frequently asked questions on the topics of active travel, environment, noise, roads and public transport and construction. The web page also provided basic design plans of the project.</p>
<p>██████████ ██████████</p>	<p>1. Treatment of Noise</p> <p>a) Road Traffic Noise Assessment (SLR) (Noise Report, Appendix F) – Comments and questions</p> <p>General</p> <p>The report would benefit with a definition of terms and abbreviations particularly for all various “L”s. to assist the reader.</p> <p>Monitoring Methodology (Section 3.1)</p> <p>The monitoring methodology used in the noise report is not consistent with the Roads ACT Noise Management Guidelines (TCCS June 2018). These Guidelines require that noise impacts must be considered on blocks adjacent to the proposal. Table 1.3 specifies that measurements should be taken at a distance of one metre forward of the building façade.</p> <p>Contrary to this requirement the noise loggers for the William Hovell assessment were located in paddocks west of William Hovell Drive, up to 1 km away from houses directly impacted by the project (figure 1). The loggers should have been placed in accordance with the Guidelines or in an agreed position near the existing residences to get actual measurements close to residents directly affected by the proposal, i.e. adjacent to the Whitlam Estate and the properties in Andado, Florina, Kurundi and Mainoru Places backing onto William Hovell Drive. This data would be far more meaningful and reliable for predictions and avoid obvious criticism from residents.</p> <p>The choice of timing for noise monitoring is also questionable and possibly unrepresentative. Starting the measurements on Friday 24 April at the start of a</p>	#6	<p>Terms provided in updated EIS glossary.</p> <p>Re: monitoring methodology (section 3.1)</p> <p>The noise monitors were located in sites away from residential areas to obtain a more accurate reading of noise levels due to the road usage and not affected by external factors (other local roads, buildings).</p> <p>The Road Traffic Noise Assessment section 2.1 discusses The Roads ACT Noise Management Guidelines 2018 (ACT Guidelines). Section 7 of the ACT Guidelines addresses upgrading of existing roads in existing areas.</p> <p>Table 1.3 in the ACT Guidelines provides the noise levels not to be exceeded after construction completed at sensitive land uses, based on the pre road noise levels. This is the noise levels the project is designed to, including the mitigations proposed.</p> <p>Schedule 3 of the ACT Guidelines provides the guidelines for the upgraded roads. It is this schedule that refers to noise levels as measured at adjacent sensitive receivers. This schedule refers to noise measured after the completed road works, a confirmation in reality that the road is performing, and noise experienced at sensitive receivers, does not exceed the limits set in Table 1.3.</p> <p>The project has used noise modelling to inform the noise that will be generated from the project, using the noising monitoring as an input, and this modelling has assessed the noise that would be experienced at the sensitive receivers. This is documented in the Road Traffic Noise Assessment at Table 6.</p>

Person	Comment	Proponent Comment
	<p>three-day Anzac Day long weekend seems an inappropriate choice as it is likely to lead to lower noise measurements than would normally occur.</p> <p>The chosen methodology creates the perception that the results are inaccurate and potentially biased towards lower measurements than actual.</p> <p>The field work should be re done to gain more accurate data.</p> <p>Noise Model Validation (Section 4.4)</p> <p>Table 5 indicates the difference between the measured and predicted noise levels. For location 2 the difference is +1.9dB between measured (69.8dB) and predicted (67.9dB). The discrepancy is large but is “considered within the commonly accepted range of noise of modelling accuracy” i.e. +/- 2dBA. The basis of this conclusion is not established.</p> <p>However, on the basis of this statement the noise model is “considered verified”. Noting the discrepancy is just within the asserted nominated accuracy range but greater i.e. louder which is concerning, it would appear that a more rigorous validation process is required. Was consideration given to carrying out further field measurements to explain the difference?</p> <p>Predicted Road Traffic Noise Levels (Section 4.5)- queries on modelling inputs</p> <p>The crosssections (Ch 0 to 480) (drawings XS 1300 to 1306) indicate a reduction in the batter on the left side (Hawker). Is this reduction in height and the earthworks formation to create the shared path alignment picked up in the noise impact modelling?</p> <p>This change in height will reduce the distance the traffic noise travels thereby increasing the impact for residents.</p> <p>A similar comment also applies to the substantial earthworks near Ch660 (drawing XS 1309) to create the shared path.</p> <p>Has the impact of the noise reflection from the concrete retaining walls on the west side of the road been considered?</p> <p>Mitigation Measures (Section 4.6 and Section 5)</p> <p>The section on noise mitigation treatments investigates two noise barrier options and the use of open grade asphalt (OGA).</p>	<p>The noise model was validated and verified for use in the assessment. This methodology was confirmed with TCCS – Infrastructure Planning as acceptable.</p> <p>Re: noise model validation (s4.4)</p> <p>refer EIS response #2</p> <p>The NSW RMS Model Validation Guideline 2018 (NSW Guideline) identifies that an error (in road traffic noise modelling) is ‘the difference between measured and predicted noise level’ and recognises two types of errors. Figure 1 in the NSW Guideline presents the difference in measured and predicted noise, having a standard deviation of +/-2dBA. It further states that “<i>while error effects may be nominally small so are the 1dBA and 2dBA noise increase trigger for noise mitigation under Roads and Maritime and EPA Guidelines</i>” (NSW Guideline, page, 3). Therefore, the NSW government advice is that up to 2 dBA is considered a small increase in noise.</p> <p>In the ACT Guideline, section 2 ‘Scope’, states that “An increase of 5dB is when most people will start to be aware of a difference” in noise levels experienced. Therefore, a difference of 2dBA is unlikely to be detected by most people.</p> <p>Predicted road traffic noise levels (s4.5)</p> <p>The Road Traffic Noise Assessment (EIS, Appendix F) – section 4.6.1 identifies the noise modelling has taken into consideration the installation of barriers for the road.</p> <p>Details are provided in the Road Traffic Noise Assessment – at its appendices E and F. The appendices show the barrier (noise protection wall) height behind the Hawker residences as 2.5m, and Whitlam residences as 1.5m and 2.3m, that were taken into account.</p> <p>Appendix C of the Road Traffic Noise Assessment provides the 2020 modelled noise levels for the project area.</p> <p>These appendices map the traffic noise levels, as contours, from the road.</p>

Person	Comment		Proponent Comment
	<p>The Conclusion of the report Indicates the use of OGA “is the preferred mitigation approach”.</p>		<p>The change in earthworks and barrier height is not required to be specifically assessed as it is taken into account in the modelling parameters (criteria).</p> <p>The numerical values of the current (modelled) noise levels and the modelled future noise levels with the barriers are compared in table 8 of the Road Traffic Noise Assessment. Table 8 shows that the use of Open Graded Asphalt (OGA) as noise mitigation is effective and is predicted to result in compliance with the project target noise levels at all receptor locations.</p> <p>The design plan overview of the road at the Drake Brockman Drive end (Hawker end) shows an embankment on the eastern side of the road, and concrete retaining walls on the western side. Therefore, any ‘reflection’ would remain in the road corridor or overtop the embankment. The combination of elevation difference and distance would reduce the noise level experienced at the houses.</p> <p>Noise mitigation measures (s4.6 and s5)</p> <p>The conclusion of the report is written and read as low noise pavement as being the preferred mitigation approach, along with the noise barriers as another mitigation option.</p> <p>The EIS report section 5.5.4.2 confirms both the barriers and road pavement surface will provide noise mitigation and are to be considered, as well as building treatments. The EIS report also indicates the effectiveness of a low noise road pavement surface may reduce over time, as indicated by the maintenance requirement or replacement (note to tale 5-25). The use of the low noise pavement would require consideration in respect of the maintenance requirements and agreement of the ACT Government (TCCS) would be needed.</p> <p>Further assessment and consideration to which single or combination of noise mitigations will be progressed.</p>
<p>██████████ ██████████</p>	<p>b) Noise Mitigation – Numerous Inconsistencies across the various components of the EIS and with the Development Application</p>	<p>#7</p>	<p>The EIS report at section 5.5.4.2 identifies that investigation of three operational noise management measures is to be undertaken.</p>

Person	Comment		Proponent Comment
	<p>Other components of the EIS also assess noise mitigation options.</p> <p>The Traffic Assessment Report (SMEC) (Appendix C) indicated OGA “is the preferred mitigation approach” (p24 Section 5.7)</p> <p>However, the Draft EIS Statement (SMEC) (Main Report) indicates the project includes two acoustic walls (executive summary, page v.)</p> <p>Section 5.5.4 Mitigation of the Draft EIS states:</p> <p>“From a technical perspective, noise would be sufficiently mitigated by using two noise walls for a portion of the project that are in close proximity to these noise receptors. These noise barriers would reduce noise at affected receptors to levels compliant with the assessment criteria. Noise barriers have been recommended as part of this proposal as they offer a long term approach to noise mitigation and are suitable in this instance.</p> <p>Scans of these three pages are attached for easy reference.</p> <p>This is contrary to the conclusions of Noise and Traffic report. This needs to be clarified. Additionally, there is no evidence on the General Arrangement Plans of the acoustic walls. Clearly the EIS and Development Application (DA)needs to establish the proposed mitigation method.</p> <p>If acoustic walls are proposed their location and visual impact needs to be determined. There is no mention of acoustic walls in the Draft EIS report Section on Landscape and Visuals (Section 5.8).</p> <p>I also note the Pavement drawings in the DA do not identify the use of OGA.</p> <p>Finally, I am aware that the Minister for Roads and Active Travel, Hon Chris Steel MLA, advised on 18/7/2020 that “the final wearing surface of the duplicated road being a low noise producing asphalt product” (Question on Notice Paper, No 48 Question No 3194).</p>		<p>The Traffic Assessment Report (SMEC, Appendix C) referenced Road Traffic Noise Assessment (Appendix F) in its recognition of the noise mitigation treatments.</p> <p>refer also the response to the last comment at #6</p> <p>The EIS Appendix F Noise and Vibration Assessment, provides noise contours resulting from the use of the low noise pavement as of 2031 within Appendix G of the report.</p> <p>In accordance with the appropriate guidelines, the Road Traffic Noise Assessment discussed possible mitigation measures and the benefits and limitations of each. Measures could include noise walls, low noise pavements (open graded asphalt), reducing traffic speeds or undertaking onsite treatments at residences. The use of low noise pavement where required is the current preferred treatment and will be investigated further with Roads ACT. The recommendation of this option is based on effectiveness, aesthetics, ease of construction and cost criteria.</p> <p>The identified options to mitigate noise levels include noise walls / earth mounds, on-site treatments at residences and low noise road pavements. There will be ongoing discussions with the community to determine the preferred noise mitigation measures. It should be noted the noise impact at 2031 is very low and has been determined at 1 and 2 decibels over the standard.</p>
<p>██████████ ██████████</p>	<p>c) Other Comments</p> <p>As a local resident, traffic noise is evident throughout the day and increases at peak times. The noise is apparent from directly opposite our property and from the south coming up from the road below. The noise from the south is at times perceivably louder and seemingly magnified by the stone chip seal.</p>	#8	<p>Table 8 of the Road Traffic Noise Assessment (EIS, Appendix F) shows that the use of Open Graded Asphalt (OGA) as noise mitigation is effective and is predicted to result in compliance with the project target noise levels at all receptor locations</p> <p>The use of the low noise pavement is identified as a noise mitigation response in the EIS and will be progressed.</p>

Person	Comment		Proponent Comment
	<p>I would support the adoption of OGA along the duplication as recommended by the Noise Report and advised by the Minister.</p> <p>The OGA should extend for the full length of William Hovell Drive to beyond the projected south boundary of block 34, section 26 (17 Mainoru PI) - see attachment. This would be similar to the extent of treatment proposed adjacent to the Whitlam Estate (refer Appendix G of Noise Report for details).</p> <p>This treatment would certainly be beneficial to the outdoor amenity and appreciated by the many people that use the reserve for walking and recreation every day as well as the residents.</p>		<p>The identified options to mitigate noise levels include noise walls / earth mounds, onsite treatments at residences and low noise road pavements. There will be ongoing discussions with the community to determine the preferred noise mitigation measures. It should be noted the noise impact at 2031 is very low and has been determined at 1 and 2 decibels over the standard, which does not represent an increase that is necessarily perceptible to the human ear.</p>
<p>██████████ ██████████</p>	<p>2. Traffic Assessment Report (Appendix C)</p> <p>The report looks at William Hovell Drive (between John Gorton Drive and Drake Brockman Drive) in isolation.</p> <p>Section 6 concludes</p> <p>“overall there are not expected to be any negative impacts on the surrounding transport network”</p> <p>There is no analysis to substantiate this statement.</p> <p>Congestion on the road particularly in the AM peak is more a factor of the performance of downstream intersections and the road network as a whole.</p> <p>From my experience delays on William Hovell Drive are due to the performance (queueing) at the Bindubi St signalised intersection, at Glenlock interchange, Parkes Way tunnel at the ANU and particularly the performance of the off ramp to Commonwealth Ave and the unregulated layout of the Coranderrk St roundabout on Parkes Way. Have the broader impacts of the increased traffic volumes from the Ginninderry estate been assessed at these “congestion” points? Duplicating this section of William Hovell Drive will no doubt increase the traffic capacity of the road, but it will provide little relief to congestion if wider network problems are not considered. This impact should be considered.</p>	#9	<p>refer EIS response #3</p> <p>The Project is to address existing traffic congestion within this section of William Hovel Drive, being the only unduplicated portion. It will also support future residential development in the Molongo Valley and West Belconnen. This is achieved by the additional capacity of the duplicated road.</p> <p>The performance of roads on the wider arterial road network would be considered separately from this EIS and any subsequently proposed works would form a new project.</p> <p>The following is provided in Section 5.1.3 of the EIS:</p> <p><i>According to the Transport Assessment the Project will not generate any traffic, according to traditional traffic generation methodologies. However, the upgrade will result in a redistribution of traffic across the Canberra road network and may also lead to a small increase in traffic volumes due to the relatively lower congestion and easier road travel. This increase on traffic should be accompanied by a reduction in traffic volumes across other arterial and lower order roads in Belconnen.</i></p>
<p>██████████ ██████████</p>	<p>3. Shared Path Alignment</p> <p>A shared path is proposed for the length of the duplication.</p> <p>No information is provided on the basis of the alignment selection and what options were considered. e.g., utilising the track to the old Weetangera Cemetery on the</p>	#10	<p>Refer to response #4 above.</p>

Person	Comment	Proponent Comment
	<p>west side of the road, or following the existing dirt track at the rear of the Hawker properties. A briefing by the project consultants on the basis of design and options considered would be beneficial to residents.</p> <p>Possibly there is a design report that includes these details.</p> <p>Specific comment on the design</p> <p>A revision of the shared path alignment is suggested to retain a healthy stand of eucalyptus to the rear of blocks 16,17 & 18 section 30 (11,13 & 15 Kurundi Place). (Drawings SMEC RD -0112 – 13 & ELD LP 02& 03)</p> <p>The current design seems poorly chosen as it not only goes through the eucalyptus but also cuts into the bank near the existing underpass under William Hovell Drive involving substantial earthworks and other vegetation clearing.</p> <p>A suggested more sympathetic alignment both in terms of avoiding tree clearing minimizing earthworks and grade is attached for reference.</p> <p>Please refer to the attached markups on the GA and Landscape Plans and accompanying photographs.</p> <p>At a broader scale, have alternative alignments been considered that would be of benefit to people that currently use the track that runs at the back of the properties. i.e. an alignment that follows or follows close to the existing track and extends onto Belconnen Way (refer attachment).</p> <p>This option still provides the connection to the on-road cycle path a little further to the north of Drake Brockman Drive intersection and has the added advantage that it connects to Belconnen Way and the path network to the north of Belconnen Way. This option would reduce the significant earthworks and vegetation clearing in the current proposal (particularly around Ch 440). At a local level the existing paths from the Mainoru, Kurundi and Florina Places could also be linked. Currently this is not even proposed in the current application. In some regard the current design seems quite remote from the suburb. Linking with the existing path network would promote benefits to residents as well as commuter bike riders.</p> <p>This option would be an upgrade of the existing track which in some areas particularly at the section between Drake Brockman Drive and Belconnen Way is in poor condition and in need of serious maintenance.</p> <p>I am also curious why the path needs to be so close to the road as it goes further to the south (Ch 880 – 2380). There seems to be an opportunity to locate the path</p>	

Person	Comment		Proponent Comment
	<p>further to the east above the road to minimize tree clearing (frequently noted on the ELD drawings) and earthworks. Reference SMEC drawings RD-00112 to RD-00117 and ELD drawings LP03 to LP08.</p> <p>Surely for amenity of users it would be better to be away from the road. The same principal would apply as the path continues to Whitlam.</p> <p>Conversely there is an option on west side of William Hovell Drive that could be adopted including taking advantage of the proposed access to the old Weetangera Cemetery.</p> <p>All these matters could be explored with proper public consultation.</p> <p>It would be very beneficial if the proposed alignment of the shared path is field pegged so the actual alignment could be appreciated by reserve users and the impact on trees properly assessed.</p>		
<p>██████████ ██████████</p>	<p>4. Public Consultation</p> <p>Section 9.1 of the Scoping Document states that consultation “must be undertaken with the local community.”</p> <p>Section 9.2 states</p> <p>“A plain English statement explaining the proposal and conceptual drawings must be made available to the community and stakeholder during consultation.”</p> <p>An extract from the Scoping Document is attached.</p> <p>This has not happened. As a local resident impacted by this proposal I have had no contact from the Government or the Consultants working on the project. Residents have been left with no alternative other than to read multiple long technical reports with many appendices and impenetrable technical language, to try to understand how the project will impact them.</p> <p>While I understand there has been consultation with broader conservation and other community groups (eg Pedal Power), no effort has been made to communicate with all the households who will live with the new road and shared path at their backyards.</p> <p>As a minimum It would have been appropriate to write to the relevant households of Andado, Florina, Kurundi and Mainoru Places giving them the same opportunity as the broader community groups to contribute to the project in the design phase.</p>	#11	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p> <p>The webpage for the Project and Exhibition of the EIS provided an overview of the project and its key features, and response to frequently asked questions on the topics of active travel, environment, noise, roads and public transport and construction. The web page also provided basic design plans of the project.</p>

Person	Comment		Proponent Comment
	<p>This would also have the benefit of reducing uncertainty for those people living close to the project.</p> <p>In an earlier representation prior to Lockdown (G63JLT) I made a number of suggestions including a display at the Hawker shops, a community forum and at least a letter box drop of residents directly affected by the proposal.</p> <p>I think the community really wants to understand the project and be taken on the journey in achieving a good outcome.</p> <p>Until this has been properly and satisfactorily undertaken the EIS should not be accepted.</p> <p>I appreciate the opportunity to comment on the proposal.</p>		
<p>Pedal Power Kate Mokrij</p>	<p>Pedal Power supports the construction of new on-road cycle paths and 3.0m wide shared path as part of the William Hovell Drive duplication project as recommended in the Draft Environmental Impact Statement (EIS).</p> <p>As noted in the draft EIS, the construction of these paths is “directly aligned with various statements of Strategic Directions”. These include; ACT Planning Strategy 2018, Transport for Canberra: Transport for a sustainable city 2012-2031, ACT Transport Strategy 2020, Health Canberra: ACT Preventative Health Plan 2020-2025, and the National Capital Plan.</p> <p>The shared pathway provides safe separated active travel linkages to the main path network at Bindubi Street for residents of West Belconnen, and Molonglo. There is a substantial population in West Belconnen that does not have high quality separated infrastructure to enable travel to the city and other areas of Canberra. Similarly residents of Molonglo, in existing or future suburbs, do not have a safe separated active travel route to the northern side of Lake Burley Griffin or to Belconnen. The on-road cycle paths and 3.0m wide shared path proposed as part of the William Hovell Drive duplication project provide these desperately needed active travel linkages. Further synergies with the Canberra trunk path network may be obtained in future if a separated path alongside Coulter Drive, connecting Molonglo to the Belconnen Town Centre is built.</p> <p>As noted in the EIS (p89) the current design of William Hovell “represents a substantial risk for pedestrians and cyclists”. Usage is low, despite the road being a major thoroughfare connecting important parts of Canberra. A shared path alongside William Hovell Drive would “offer users a safe, direct connection to Civic and the trunk network around Lake Burley Griffin”. Providing good access to this</p>	<p>#12</p>	<p>Nil response required</p> <p>Submission supports the provision of the on-road cycle path and the off-road shared pathway.</p>

Person	Comment		Proponent Comment
	<p>potential shared path would encourage broader use and less reliance on private cars.</p> <p>Pedal Power agrees with the EIS (p143) that a high quality shared path would offer pedestrians and cyclists greater access to the Nature Parks alongside William Hovell Drive and that although some trees may have to be removed replanting of replacement trees would mitigate this. In summary, Pedal Power sees that the construction of both on-roads cycle paths and a 3.0m wide shared path as part of the William Hovell Drive duplication would benefit both local residents and provide an important missing link in the Canberra trunk path network. Environmental impact will be limited, and the liveability of West Belconnen and Molonglo areas of Canberra greatly enhanced.</p>		
<p>Pedal Power Dr. Robert Dalitz</p>	<p>Overall the plans appear of good quality and will provide an excellent link between West Belconnen, the Molonglo area and potentially the main paths into Belconnen and the City area. There are no main active travel paths to link with at either end of these works. This issue is probably beyond the scope of the William Hovell Drive (WHD) works.</p> <p>Some comments on the plans are set out below. If you could respond to these that would be great.</p>	#13	<p>Refer to response #4 above.</p>
<p>Pedal Power Dr. Robert Dalitz</p>	<p>Landscape plan</p> <p>Can you clarify exactly how the shared path is separated from the road? It looks like the when the shared path is directly alongside the road it is separated from the road by a small gutter or hardstand, or similar.</p> <p>How wide are the on-road paths? Is there any marking to indicate that they are for cyclists? In what ways is the safety of cyclists being included in the design of the on-road paths? E.g. paint, surface treatment etc.</p>	#14	<p>The revised EIS now provides for both an onroad cycle path in addition to an offroad shared user path. The shared path begins and ends at intersections. The shared path will run alongside the cemetery access road and will not impact the old Weetangera Cemetery. To avoid conflict with the equestrian path / users, another equestrian path is being built. Equestrian path will have a new route to the west.</p> <p>The alignment of the shared path was optimised to make the path as safe as possible, whilst minimising environmental impact. By pushing the shared path further away from the road in numerous places, required extensive cut batters that would then impact additional vegetation (including the nature reserves) as well as crossing property boundaries. The shared path remains within the road reserve and so does not take on additional land which has not been designated for roads and related road infrastructure uses.</p> <p>However, the shared path designed is designed to be safe and in accordance with Australian Standards and Road Design Guidelines. If</p>

Person	Comment	Proponent Comment
		<p>the shared path is close to the road, it is separated by road safety barriers. Additionally, there will be a much small interface between cyclists and the offleash dog area which greatly improves safety for shared path users. Moreover, the shared user path caters for pedestrians as well as cyclists that are not overly confident.</p> <p>The shared path designed is designed to be safe and in accordance with Australian Standards and Road Design Guidelines (the nominated 3 metre wide shared path is in accordance with the ACT Design Standards, and also in accordance with the Austroads technical guidelines (the peak organisation of Australasian road and transport agencies)). If the shared path is close to the road, it is separated by road safety barriers. Additionally, there will be a much small interface between cyclists and the offleash dog area which greatly improves safety for shared path users. Moreover, the shared user path caters for pedestrians as well as cyclists that are not overly confident.</p> <p>On-road cycling lanes will be delivered in both directions as part of this project. These will be appropriately demarcated using road markings with additional signage to warn drivers of the presence of cyclists. At intersections, additional road markings and signage will be provided to warn drivers of the presence of cyclists.</p>
<p>Pedal Power Dr. Robert Dalitz</p>	<p>Road alignment plan It appears that the paths have no connection to other paths or infrastructure at either end, especially the Drake Brockman end. Is this correct?</p> <p>At the John Gorton Drive end the Minister has responded to questions in the Legislative Assembly that the path will continue onto Bindubi Street. Can you confirm that, and perhaps provide some context to that path design.</p> <p>Sheet 2 and 3 show a feature that looks like a road or path crossing the shared path. Can you clarify what this feature on the drawing is?</p> <p>Sheet 8 shows a road coming off William Hovell to the south that crosses the shared path. It appears by the design that this could be a possible safety issue. The cyclists will likely be travelling fairly quickly at this point and may not be expecting any vehicular traffic. Cars travelling along WHD can turn into the road and immediately cross the shared path. They may do this at speed and be more</p>	<p>#15</p> <p>Refer to response #4 above with regards to amendments to the path alignment.</p> <p>Future planning for shared path facilities include the extension of the shared path from Coulter Drive to the Bindubi Street to connect with the existing shared path at the Bindubi street. Parking has been provided at the Brake Brockman Drive intersection at the start of the Shared user path.</p> <p>The Shared User Path joins with the Bicentennial trail to cross William Hovel Drive at the underpass between Drake Brockman Drive and the Weetangera Cemetery shown on sheets 2 and 3.</p> <p>Sheet 8 shows the access road to the Kama Nature Reserve. The shared path has been realigned away from the intersection to improve the safety of the crossing. Additional signage will be included to warn drivers and cyclists of the crossing.</p>

Person	Comment		Proponent Comment
	<p>concerned with avoiding any issues on WHD and have no time to see if the shared path has cyclists on it.</p> <p>There is the possibility that this may create potential problems. Pedal Power suggest that this aspect of the design is altered so that both cyclists and drivers have good sight lines and traffic is slowed. A suggestion is to move the crossing point of the road to Kama nature Reserve and the shared path further east. If the crossing was after the 90 degree turn in the road car traffic would be slowed and cyclists would have plenty of opportunity to see any cars. If the shared path came out and moved in chicane shape it would also slow cyclists and provide a designed in notice that this is a potentially dangerous location.</p> <p>Sheet 16, can you clarify the nature of the end of the path at John Gorton drive and will cyclists have lights, a painted path etc.</p>		<p>At the John Gorton Drive intersection the shared path joins a shared path between John Gorton and Coulter Drive as well as the on road cycle facilities on William Hovel Drive and John Gorton Drive.</p>
<p>Friends of Grasslands Naarilla Hirsch</p>	<p>Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.</p> <p>FOG made a submission about Referral 2020/8703 in July 2021 and is pleased to see that an EIS has been required to investigate many issues triggered by the proposed duplication of William Hovell Drive.</p> <p>FOG is also pleased to find that many points which FOG made in its submission 13 months ago have been put forward for consideration, notably those to Avoid habitat loss, Avoid loss of mature Eucalypts, Offset Box Gum Woodland (BGW) loss, Reuse timber, Replanting, and Control of Weeds, especially African Lovegrass (ALG).</p> <p>FOG was also pleased to find many other points being considered such as excessive habitat fragmentation, analysis of cumulative impacts by development across this northern side of the Molonglo River, and of all potential biodiversity risks.</p> <p>However, FOG is deeply concerned that the EIS is not yet developed to a stage that can be used as an instrument to control the potential duplication project. Specifically, the issue of offsets is not taken far enough. Analysis clearly reveals impacts on several MNES and concedes that about 6.5 ha of Box-Gum Woodland</p>	<p>#16</p>	<p>Section 5.2.4 of the EIS sets out the process and timeframe for achieving an Offset Strategy and finalising an Offset Management Plan for the Project, in consultation with the Conservator and the Offsets Working Group. The timeline for achieving this in concurrence with the EIS is considered to be suitable to the Conservator and the Offsets Working Group. As its first option, TCCS proposes to provide a direct offset to the BGW EEC. The public will be kept up to date during this process of finalising the Offset Strategy for the Project and the relevant consultation processes will be followed.</p>

Person	Comment		Proponent Comment
	<p>of moderate quality will be directly impacted if this road is duplicated, even after redesigns have minimised impact. FOG presumes this concession means that impact cannot be avoided, so that must leave only the option of offsetting.</p> <p>The scoping document (Appendix B) within section 8.12.3 explicitly requires that "If offsets are proposed to compensate for impacts on MNES, describe the proposed offsets and how they comply with the EPBC Act environmental offsets policy". FOG does note that the draft EIS includes "The Project proposes to provide an offset against the loss of BGW TEC habitat by protection of land to the west of Kama NR..... " in sections 3.2.2, 3.3.1.1, 3.3.7.3 and 3.3.7.4. Table 5-14 also lists this offset as a Biodiversity Mitigation Measure, and that it will be required prior to construction with TCCS as the responsible agency.</p> <p>FOG of course would be easily convinced that such an offset is great in principle, in fact we used this protection as an offset recommendation in our July 2020 submission. FOG is also convinced if the plan establishes such an offset prior to any construction commencement.</p> <p>However, FOG calls for immediate analysis of offset-multiple factors and at least the skeleton of an offset management plan being released for public consultation before the proposition is considered further. Only in that way can the people of the region know whether or not the direct impact on BGW can be satisfactorily offset.</p> <p>FOG submits that the EIS in such a draft form with next to no detail about offsetting and concludes it has been prematurely released.</p>		
<p>Friends of Grasslands Naarilla Hirsch</p>	<p>FOG would like to make some other comments. The first is that the 13 <i>Leucochrysum albicans</i> var. <i>tricolor</i> plants that will be impacted by the project are almost certainly self sown out of a large revegetation program where the species was introduced abundantly into the Kama Nature Reserve. Also that a few new plants of this species are also now found in the nearby Pinnacle Reserve offset area.</p>	<p>#17</p>	<p>Appendix C of the Biodiversity Impact Report acknowledges that the population of <i>L. albicans</i> var. <i>tricolor</i> 'occurring in Kama Nature Reserve and likely occurring between the study area and The Pinnacle Nature Reserve are known to have been enhanced through regeneration techniques involving soil scraping and sowing to mimic bare ground for germination. While these plants in Kama Nature Reserve are considered all planted or recruited from planted/direct sown stock, naturalised or natural plants are recorded further within the location across the northern ACT, and as per Department of Environment (2013), the population is considered to at least extend across the Canberra area'.</p>

Person	Comment		Proponent Comment
			<p>The Draft EIS – Appendix D, Table 8-3, notes that the values of the <i>L. albicans</i> var. <i>tricolor</i> are low, given that the population in the impact area is a small fraction of the local population in nearby reserves.</p> <p>An Assessment of Significance carried out for this species under the EPBC Act (refer to Appendix C of Appendix D) concluded that the Project is 'is unlikely to have a significant impact on <i>L. albicans</i> var. <i>tricolor</i>'.</p>
<p>Friends of Grasslands Naarilla Hirsch</p>	<p>Secondly, the Scoping document's Attachment B lists Entity Requirements by the ACT Conservator of Flora and Fauna. FOG agrees with the comprehensive list of issues, and notes that some suggestion for offsets was included. However, FOG wishes to highlight an issue of particular concern in weed control during construction and rehabilitation – William Hovell Drive is currently a weed bank, and the high risk that the infestation of African Lovegrass will be made worse by the project disturbance must be taken extremely seriously.</p>	<p>#18</p>	<p>Section 5.2.3.4 of the EIS specifically recognises African Lovegrass as a weed of concern for the Project.</p> <p>Additional mitigation measures have also been added to enhance weed management of the locality as part of the Project and are set out within Sections 5.2.4 and 7 of the EIS as follows:</p> <ul style="list-style-type: none"> • Flora and Fauna Management Plan is to include Protocols to manage weeds and Pathogens • Non weedy BGW topsoil to be stockpiled for use in revegetation areas. • Weed extent in the adjoining nature reserves should be documented before construction and monitored monthly during construction. If weed presence and/or extent has increased the construction contractor is to engage a suitably qualified regeneration specialist to undertake weed removal of these areas in line with the management plan for the reserve. • African Lovegrass, a highly invasive exotic and serious pest plant, is currently well established right along WHD edges. Removal of this weed should be undertaken prior to and during construction. Care should be taken for this species to not spread to the adjoining land and reserves. • Prior to the commencement of works, existing weed infestations are to be treated using appropriate methods • Non weed infested areas of native dominant understorey within the road reserve should be protected and not disturbed wherever possible

Person	Comment	Proponent Comment
		<ul style="list-style-type: none"> • All vehicles must be clean and free of visible plant propagules prior to entering and exiting the site. A vehicle brush down/washdown area will be provided • Records will be maintained demonstrating compliance. • Weedy vegetation with viable propagules (seeds, fruit, rhizomes etc) will be removed from site for safe transport and disposal at appropriate waste facility. Non-viable woody vegetation can be chipped on site • Vehicle and machinery movements will be confined to disturbed areas and existing tracks where possible. Vehicles and machinery will be cleaned (tyres brushed or washed down) prior to accessing and/or leaving areas where weeds have been identified • Use weed matting to cover any areas of exposed soil • Undertake revegetation as soon as possible post-construction • Maintain revegetated areas by undertaking weed removal until growth is enough to prevent weed invasion, as determined by a qualified ecologist • Do not stockpile vegetation containing weeds on site • Use of herbicides should be undertaken in line with the NSW Weed Control Handbook • Where reasonable possible, the contractors tasked with revegetation activities will have demonstrated capability in successfully restoring native vegetation communities • A suitably qualified ecologist will verify that revegetation activities have been undertaken to a reasonably satisfactory standard • Materials introduced into the site, such as topsoils, seeds and mulches, will be free of as much weed contamination as is reasonably possible to achieve

Person	Comment		Proponent Comment
			<ul style="list-style-type: none"> Revegetation seed used at the site will be fresh (or otherwise viable), and a sufficient sowing rate (kg/ha) will be used to ensure adequate coverage.
Friends of Grasslands Naarilla Hirsch	<p>Lastly, in the mitigation measures in table 7-1 of the Biodiversity Impact Assessment and in Section 5.2.4 of the Draft Environmental Impact Statement the text is "Areas of re-vegetation should be maintained for a minimum of two years until plantings are established". Plantings of trees and shrubs are unlikely to be completely established within two years. This would be better worded as "Areas of re-vegetation should be maintained until plantings are established". If a period is mentioned, five years would be more realistic.</p>	#19	<p>Wording of commitment has been changed as follows:</p> <ul style="list-style-type: none"> <i>Areas of re-vegetation should be maintained for a minimum of two years until plantings are established, with additional maintenance undertaken for a period of five years where required.</i>
Ginninderra Catchment Group Ms. Kat McGilp	<p>The Ginninderra Catchment Group is both a community-based natural resource management organisation and a Landcare network, operating primarily in the north-west ACT Region. Our community-driven organisation supports over 20 Landcare Groups, which includes several local Parkcare groups working in areas around William Hovell Drive, especially the Friends of the Pinnacle Group. This group, among many of our other groups, have significant involvement for expert ecologists and environmentalists who contribute significantly to our work undertaken within the catchment. Both GCG and our member groups have raised several concerns about the proposed Development Application DA202138722 - William Hovell Drive duplication and the associated EIS and project documentations.</p>	#20	nil issue raised.
Ginninderra Catchment Group Ms. Kat McGilp	<p>Firstly, the EIS provided on the website has not been finalised to a level that it can be a useful management tool to mitigate potential environmental damage from this duplication project. While there are some references to potential needs for offset areas to be designated, there are no definitive statements about mitigation work that will be done. The project impacts include 6.5 hectares of critically endangered Box Gum Woodland that will be impacted which cannot be avoided. This should require offset works to be undertaken. Any offsets would ideally be for other Box gum woodland areas of similar quality nearby. There are some areas near Kama NR that would be ideal, as listed in the EIS, assuming all reasonable efforts and funds are available to maintain these new offset areas.</p>	#21	<p>Refer to Section 5.2.4 of the EIS.</p> <p>The Scoping document, s 8.2.2, provided that the EIS must 'outline mitigation arrangement and whether an offset is likely to be required and, if so, how they comply with the EPBC Act environmental offsets policy and whether an offset management plan is likely to be required.'</p> <p>The Draft EIS, table 5-14 states that an 'an offset against the loss of Box Gum Woodland TEC habitat by protection of land to the west of Kama Nature Reserve' is to be provided prior to construction.</p> <p>The Draft EIS, 5.2.1.1 – notes that the Kama Nature Reserve is identified as an offset site under the Molonglo Valley Plan for the Protection of Matters of National Environmental Significance (ACTPLA, 2011).</p>

Person	Comment		Proponent Comment
			<p>The Biodiversity Impact Assessment, Section 7.2 outlines the recommended safeguards and management measures to safeguard biodiversity. Table 7-1 provides the mitigation measures for Box Gum Woodland: 'an offset against the loss of Box Gum Woodland TEC habitat by protection of land to the west of Kama NR'. The recommendation of the Biodiversity Impact Report is that an Offset Strategy and Plan are implemented prior to construction.</p> <p>For impacts to EPBC Act listed biodiversity, the ACT Environmental Offsets Policy requires offset strategies to deliver 90% of the offset requirement using direct offsets. The Project will adhere to all state and federal legislative requirements in relation to its offset strategies.</p>
<p>Ginninderra Catchment Group Ms. Kat McGilp</p>	<p>Secondly, the mitigation measures listed in the draft EIS and BIA state that any revegetation plantings undertaken as part of this project will be maintained for a minimum of 2 years. Most Ecologists and Revegetation Specialists would state that 2 years is not nearly enough time to maintain and monitor native plantings to maximise survival. Previous revegetation works undertaken at neighboring sites have attempted to "Maintain" new areas over 2 years, with poor success. Some of these sites are now needed to be re-planted and resown due to low survival and weed infestations in the time following the limited 2year maintenance schedule. We recommend aiming for a maintenance period closer to 5 years as this maximises the chances that these works will be maintained for high survivability and reduce the need for future contractors to come back and redo the revegetation works.</p>	#22	<p>This has been committed to in Sections 5.2.4 and 7 of the EIS.</p>
<p>Ginninderra Catchment Group Ms. Kat McGilp</p>	<p>And finally, many GCG members have raised concerns about the potential for this road duplication project to exacerbate the existing weed infestations in the area. Currently, the areas around William Hovell drive support dense stands of numerous exotic weeds, including significant weed African Love Grass, which lines the roadside where regular TCCS mowing is undertaken. If appropriate weed control measures are not enforced during construction, this project risks spreading these weed infestations to other sites, including the surrounding Nature reserves and downstream into the Molonglo Valley. Our recommendation would be for further planning to be undertaken around how these potential effects can be limited to the surrounding areas.</p>	#23	<p>Refer to response #18 above.</p>

Person	Comment		Proponent Comment
Friends of the Pinnacle John Brannan	<p>The Friends of The Pinnacle (fotpin) is a ParkCare volunteer group with a common interest in protecting, enhancing and promoting the ecological values of the Pinnacle Nature Reserve.</p> <p>Since our inception in 2010, we have contributed well over 10,000 hours of volunteer effort on the reserve in activities such as controlling weeds, conducting community planting events and assisting with visits by local schools, as well as organising guided walks led by experts on flora, fauna, ecology, local history and indigenous heritage. We are also active in the community through the local primary and secondary schools and through annual Joint ParkCare display events with other ParkCare groups in the area. We currently have 105 full members as well as a mailing list that reaches another 207 interested community members.</p>	#24	Nil response required. Introduction to this community group.
Friends of the Pinnacle John Brannan	<p>The draft EIS as it currently stands includes many measures that could potentially improve the current arrangements for fauna movement in particular between the Pinnacle Nature Reserve (PNR) and Kama Nature Reserve (KNR). The proposed fencing improvements and other measures to facilitate fauna movement are essential if the current levels of roadkill along WHD are to be mitigated.</p> <p>However, we have significant concerns regarding other aspects of the EIS. These can be broadly divided into three areas: Revegetation, offsetting for cleared Box Gum Woodland (BGW), and access to the PNR from WHD post construction.</p>	#25	<p>Supports mitigation measures. Introduction to concerns detailed in subsequent paragraphs.</p> <p>Potential fauna strike matters are considered further in Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.</p>
Friends of the Pinnacle John Brannan	Further, we strongly advise that, before contracts are signed, all non-definitive terms such as “should” and “would” (as used in Section 5.2.4, “Mitigation”), be replaced by definitive terms such as “shall” and “will”.	#26	<p>It is common practice in EIS writing throughout most Australian jurisdictions to use the conditional tense when referring to mitigation commitments. Otherwise, it sends a message to the community that certain things “will” be done, regardless of whether they obtain development approval first. Use of the conditional tense assures the reader that certain activities will only be undertaken <i>if</i> project approval is granted first.</p> <p>Nevertheless, use of the conditional tense has been changed to a simple future tense.</p>
Friends of the Pinnacle John Brannan	<ul style="list-style-type: none"> Our concerns regarding the revegetation derive largely from our experience with the revegetation of the Molonglo 3 water main, which was constructed through the PNR in 2018-19. The contractors tasked with the revegetation demonstrated little or no capability with regard to restoring native vegetation and have left the reserve with a largely weed-filled corridor which will take years to remediate. This failure to 	#27	These suggestions have been added to the mitigation measures set out within Sections 5.2.4 and 7 of the EIS - refer to response #18 above.

Person	Comment		Proponent Comment
	<p>effectively implement a detailed revegetation plan has taught us that any future such work in or near the reserve must come with clear standards and safeguards to ensure compliance.</p> <p>For the WHD duplication project we are particularly concerned with edge effects and the spread of weeds (particularly grassy weeds such as African Lovegrass) into the reserve from the construction area both during and after the construction period. It is essential that weed management be conducted both during and after construction to prevent weed spread into the PNR and KNR, as well as adjacent leased land. We would also like an assurance that the contractor or sub-contractor tasked with the revegetation has demonstrated capability in successfully restoring native vegetation communities and that experienced and qualified ecologists are engaged to monitor and sign off on the revegetation. It is also important in our experience that any introduced materials, including topsoils, seed and any mulch used, be free of weed contamination.</p> <p>It is important that the seeds used are fresh/viable and that the sowing rate (kg/ha) is sufficient to ensure adequate coverage. We are also curious to know which four species will be included in the "locally collected species mix" (section 5.10.4, P.156). We consider the current mitigation measure that "Areas of re-vegetation should be maintained for a minimum of two years..." (Table 5-14, P.102) to be insufficient and would like to see this extended to at least five years, with monitoring to be conducted by a qualified ecologist. Appendix D (Table 7-1, P.73) includes a recommendation to "Maintain revegetated areas by undertaking weed removal until growth is enough to prevent weed invasion". This determination should also be made by a qualified ecologist.</p>		
<p>Friends of the Pinnacle John Brannan</p>	<ul style="list-style-type: none"> The EIS notes that the project will result in the clearing of 6.41 ha of BGW and that an area to the west of Kama NR will be protected as an offset, but no detail is provided. We don't see how this provision can possibly be accepted without first seeing the attendant Offset Strategy and Offset Management Plan. We look forward to an opportunity to review these documents as and when they are available. 	<p>#28</p>	<p>Further details on these matters is provided in Section 5.2.4 of the EIS.</p>
<p>Friends of the Pinnacle John Brannan</p>	<ul style="list-style-type: none"> Section 7 (P.179) of the EIS states: "Access to reserves and open space would not be impacted by the Project ", however the drawings in the draft DA (DA202138722) appear to show that the current vehicle access and parking area on the north side of WHD opposite the access to Kama NR will be deleted in favour of a bicycle path that runs under WHD at that point (DA Appendix B, Landscape 	<p>#29</p>	<p>After discussions with Parks and Conservation Service, there will be no public access to either of the nature reserves off William Hovell Drive. There is access to The Pinnacle Nature Reserve from the north via Weetangera and a new carpark will be built in Whitlam on the eastern edge of Kama Nature Reserve providing a safe entrance away</p>

Person	Comment		Proponent Comment
	<p>Plan Sheet 8 of 17). This access to the Pinnacle offset and the adjacent leased land from WHD is very useful for us when conducting weed control activities and guided walks in that area of the reserve. It is also frequently used by PCS rangers, notably those responsible for maintaining the Pinnacle Offset. We note that Section 6.3 of the EIS (P.167) refers to “MS-Teams and in-persons discussions with ACT Parks and Conservation Service regarding vehicular access into The Pinnacle and Kama Nature Reserves.” Was the loss of vehicle access to the PNR covered in these discussions? We would like to see the project modified to retain the current capability for vehicles to turn off onto the northern side of WHD and park close to the gated reserve entrance.</p>		<p>from high-speed traffic. Also, not having access from William Hovell Drive will eliminate the traffic conflict of vehicles in entering and exiting the road in this location.</p> <p>There were resident concerns about proximity of shared path to residents, conflict of dog off leash area and impacts on the nature reserves.</p> <p>Community consultation was undertaken in December, and updated designs provide an access road and parking at the Old Weetangera Cemetery.</p>
<p>██████████ ██████████</p>	<p>We attended the recent “Zoom” meeting of the Belconnen Community Council, to be part of the discussion around the duplication of William Hovell Drive. Following discussion of this project, and listening to Jeremy Smith, Infrastructure Delivery, TCCS, we provide the following comments about the William Hovell Drive duplication between Coulter Drive to where it meets Kingsford Smith Drive at Drake Brockman Drive.</p> <p>Although a while ago, we had heard mention of extending the link between John Gorton Dr and Bindubi St. We assumed there was an error in this announcement, as these two roads are quite a distance away from one another and it appeared illogical to us. Having endured the very long period of roadworks to create the link between John Gorton and Coulter Drives, we assumed this is what was meant by the original announcement.</p> <p>So, to hear the budget announcement to duplicate William Hovell Drive along this stretch of road, was new to us. We do try and follow what the Government is doing in our area, but this is very difficult when there is little in writing ever available on ACT Government websites nor in the media.</p> <p>While we noticed there were ACT Government DA type notices appearing along the edge of William Hovell after Coulter in a southerly direction, the location of these signs made it impossible (and very dangerous) to stop the car and get out to see what they said. This appears to have been the only mechanism the ACT Government used to inform the community who live in the area and use these roads. Consulting a few self interest groups is not comprehensive consultation and never has been. We believe the ACT Government has not bothered to engage the residents of the suburbs impacted by this decision to duplicate William Hovell.</p>	<p>#30</p>	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p> <p>The webpage for the Project and Exhibition of the EIS provided an overview of the project and its key features, and response to frequently asked questions on the topics of active travel, environment, noise, roads and public transport and construction. The web page also provided basic design plans of the project.</p>

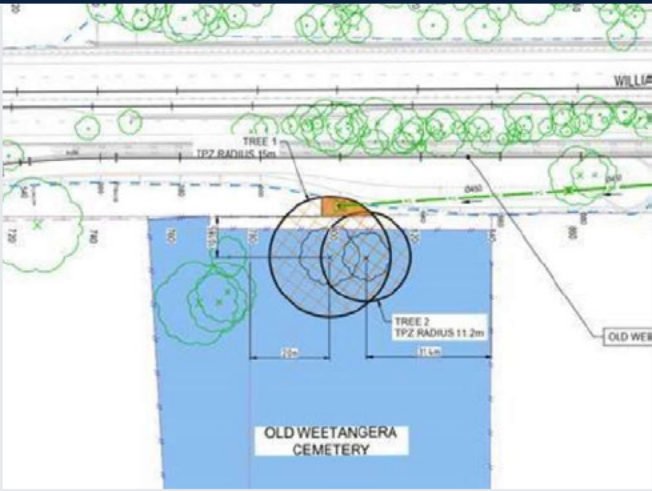
Person	Comment		Proponent Comment
	<p>While we are not commenting on the road's construction, we have a number of issues to raise which will impact the people who live in the immediate suburbs. However, having visited Kama Nature Reserve several times, the traffic noise is extreme from this section of William Hovell Dr – defeats the purpose of being in a "nature reserve".</p> <p>Having lived in Scullin since 1969, we are not users of this stretch of William Hovell, preferring to use William Hovell from Coulter Dr to Glenloch Interchange to and from home. When asked questions at the recent Belconnen Community Council meeting, Jeremy Smith indicated that the issues raised were outside the scope of this project and would not be addressed. These are current issues which we believe must be addressed before proceeding with this duplication, to get it right and make it successful.</p>		
<p>██████████ ██████████</p>	<p>Issues – both current and future</p> <ul style="list-style-type: none"> • The speed limit on William Hovell between Glenloch and Coulter is currently 80kph, but to travel at this speed (as we both do) it is very rare that we pass another vehicle. In our experience, the traffic is actually doing anywhere between 80-100kph here. To turn right into Coulter (from the south), it is important to be in the right lane well in advance, to ensure you do get to turn. There are way too many right hand lane motorists who believe the right lane is there for them to travel fast and beyond Coulter turnoff. We also note, since the roadworks were completed at Coulter/ John Gorton Drive intersections, that the Coulter lights let fewer cars turn right, plus a longer wait now. 	#31	<p>The management of traffic and how traffic use the section of William Hovell Drive between Glenloch interchange and Coulter Drive is outside the scope of this Project.</p>
<p>██████████ ██████████</p>	<p>Issues – both current and future</p> <ul style="list-style-type: none"> • Kingsford Smith Dr between Scullin & Higgins is somewhat of a speedway with traffic travelling north from William Hovell Dr past Drake Brockman Dr, and continuing at speeds of 80kph++. It is the traffic lights at Southern Cross Dr which finally stops this ongoing speeding traffic. There is also a fair amount of industrial heavy haulage and b-double vehicles using this route. We believe there needs to be some other form of traffic calming measures to cater for the intersection with Belconnen Way (this roundabout is very poorly cambered) and the three other intersections along this stretch. Otherwise, there will only be more accidents for local traffic trying to cross to adjacent suburbs. With schools closed and shops closed this is vital, and needs addressing now. 	#32	<p>The management of traffic and speed of traffic using roads of the network external to WHD is outside the scope of this EIS.</p> <p>Section 1.1 of the EIA and Appendix C Transport Impact Assessment identifies a key feature of the project as to retain the 90km/h posted speed limit.</p> <p>The EIS confirms the current speed limit on William Hovell Drive in the project area as being 90km/h (section 2.2.3).</p>

Person	Comment		Proponent Comment
<p>██████████ ██████████</p>	<p>Issues – both current and future</p> <ul style="list-style-type: none"> • There is a long history of difficulties for suburban traffic crossing Kingsford Smith between Scullin and Higgins, with accidents occurring at all three of these intersections (plus Belconnen Way). The Kingsford Smith traffic travels in a spasmodic manner, but with the speed of the traffic, it can be a lengthy wait to cross to the median strip and then find eyes in the back of your head to watch for the traffic in the other carriageway before crossing. This is very much the same problem as on Southern Cross Dr, where after many years of lobbying, traffic signals are finally being installed to assist Scullin residents to turn right and cross to Florey. Latham and Florey residents also need to cross Kingsford Smith, which is difficult to do - also an intersections with accidents. 	#33	<p>The intersections outside the project area are beyond the scope of the EIS and this project. Management of traffic and the performance of roads in the network external to WHD is outside the scope of this EIS.</p>
<p>██████████ ██████████</p>	<p>Issues – both current and future</p> <ul style="list-style-type: none"> • Using the intersection between Kingsford Smith & Southern Cross Drs often, we (and others) noted how much extra traffic was travelling both directions on Kingsford Smith. This appeared to commence at the same time as the light rail construction down Northbourne Ave, as Gungahlin residents discovered Clarrie Hermes Dr, Kuringa Dr, Kingsford Smith Dr was a good alternative to Gungahlin Dr to travel south. This increase in traffic has not abated, especially at peak commuter times. 	#34	<p>The intersections outside the project area are beyond the scope of the EIS and this project. Management of traffic and the performance of roads in the network external to WHD is outside the scope of this EIS.</p>
<p>██████████ ██████████</p>	<p>Issues – both current and future</p> <ul style="list-style-type: none"> • We believe if the Government is duplicating William Hovell Dr – and no doubt increasing the speed limit – it would be totally irresponsible not to consider the appropriateness of traffic using the Melba end of Kingsford Smith with a single lane both ways and residential driveways coming off it. We regularly use Kingsford Smith between Southern Cross and Gungahlin ourselves and know how the motorists travel here – not forgetting the very heavy haulage vehicles using this route. 	#35	<p>Section 1.1 of the EIA and Appendix C Transport Impact Assessment identifies a key feature of the project as to retain the 90km/h posted speed limit. The EIS confirms the current speed limit on William Hovell Drive in the project area as being 90km/h (section 2.2.3).</p>
<p>██████████ ██████████</p>	<p>Conclusion</p> <p>As the consultation by ACT Government has virtually been non-existent, and the documentation is so lengthy it is very unclear whether traffic signals will be installed at Drake Brockman Dr as part of this construction. If not we can only expect more accidents. At the BCC meeting there was an emphasis that this William Hovell duplication is for people travelling to Ginninderry, Strathnairn &</p>	#36	<p>The EIS at section 5.1.3 states that “in consultation with TCCS, it has been confirmed that the preferred option is to signalise the intersection with DBD (Drake Brockman Drive). This would satisfy the intersection performance requirements, whilst also limiting future barriers to active travel.” A signalised intersection is also indicated in Figure 5-1.</p>

Person	Comment		Proponent Comment
	<p>Macnamara, but much of the traffic turns left further along Kingsford Smith at Ginninderra Dr to end up at Dunlop, Charnwood, Fraser, etc.</p>		<p>A signalised intersection is therefore to be progressed, replacing the existing round-a-bout.</p> <p>Detail of the operation of the intersection, as signalised, is provided in Appendix C Transport Impact Assessment at section 5.1</p> <p>This was specifically identified on the Your Say webpage under the project details – transport frequently asked questions:</p> <p><i>The decision to update the existing roundabout with a signalised intersection was the subject of a separate design investigation which examined the benefits and disbenefits of each. The signalised intersection is preferred as it provides significant safety benefits for all users. Signalising of intersections is considered the safest treatment to move cyclists and pedestrians over roads. Signals direct the movement of traffic across the intersection, minimising the risk of conflict.</i></p>
<p>██████████ ██████████</p>	<p>Conclusion</p> <p>More consultation and research is needed by Government prior to commencement of the project.</p>	<p>#37</p>	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p> <p>The webpage for the Project and Exhibition of the EIS provided an overview of the project and its key features, and response to frequently asked questions on the topics of active travel, environment, noise, roads and public transport and construction. The web page also provided basic design plans of the project.</p> <p>The submissions received through this process have been considered in the revised EIS. As a result, the project design supporting documentation has also been reviewed and updated in response to that additional information.</p>

Agency Comments EIS Draft - EIS202000014

Agency	Comment	Response # (PA-EIS)	
ACT Heritage Council	<p>The Council advises that further information is required to ensure that the EIS meets the Scoping Document requirements, as it is unclear if the proposal will cause damage to Aboriginal places WDH1 and PAD1, and/or diminish the significance of the Weetangera Cemetery. Additionally, the assessment of potential impacts to the Kama Woodland/Grassland within the EIS is inconsistent.</p> <p>The following is therefore required within the Final EIS:</p>	#38	Noted – see responses below.
ACT Heritage Council	<ul style="list-style-type: none"> The Final EIS must consider if drainage and revegetation works associated with the duplication will cause damage to Aboriginal place PAD1. Plans and/or maps indicating the locations of proposed works relative to the location of PAD1 are to be included. If works are proposed within the PAD then an Excavation Permit must be sought for the further investigation of any PAD areas that would be impacted by the proposal, and archaeological testing undertaken in accordance with any Council approval issued under Section 61F of the Heritage Act 2004. If PAD1 were confirmed to be a site, prior to DA submission additional Heritage Act 2004 approvals would be required to permit works within it, and it would be necessary during this process to establish that there were no reasonably practicable alternatives to the works; 	#39	<p>The Concept Design conflicted with PAD 1. However, the updated Detailed Design has revised this interaction with PAD 1 so there is no conflict. These changes are reflected in the updated CHA.</p> <p>As works are not proposed within the PAD, no Excavation Permit is considered necessary.</p> <p>Additional statements have been provided in Section 5.4.3 of the EIS with respect to this, including mitigation measure to maintain this 7m buffer at a minimum.</p> <p>It is generally not appropriate to provide more detailed mapping of PADs in publicly available documentation.</p>
ACT Heritage Council	<ul style="list-style-type: none"> The Final EIS must consider if drainage and electrical infrastructure works will cause damage to Aboriginal place, WDH1. Plans and/or maps indicating the locations of proposed works relative to the location of WDH1 are to be included. If WDH1 will be damaged, prior to DA submission Heritage Act 2004 approvals would be required. Consideration must also be given as to whether there are reasonably practicable alternatives that would avoid damaging WDH1; 	#40	Interrogation of the Project's design drawings confirms there is no direct impact to WHD1. Therefore, there is no need to consider Heritage Act 2004 approvals as part of the EIS or DA processes.
ACT Heritage Council	<ul style="list-style-type: none"> The Final EIS must consider the proposed drainage and access works near the Cypress trees that are part of the Weetangera Cemetery in more detail. It is unclear if the recommendations in the revised CHA of a 10 m buffer from the dripline of the trees can be implemented. It may be necessary to engage a specialist, such as an arborist, to assess if works as currently proposed may impact these trees. Effort must be made to ensure that the development does not impact these trees. If the proposed works will impact the trees, and subsequently 	#41	<p>The design includes a small batter that goes past the cemetery, albeit not into the actual cemetery.</p> <p>Interrogation of the Project's design confirms that it will not be possible to stay more than 10m away from the dripline of trees as shown on the design extract below:</p>

Agency	Comment	Response # (PA-EIS)	
	<p>diminish the significance of the Weetangera Cemetery, Heritage Act 2004 approvals will be required; and</p>		 <p>On calculating the standard Tree Protection Zone (TPZ) as per <i>Australian Standard Protection of Trees on Development Sites AS 4970-2009</i>, the Project's impact to this one tree will be around 5-6% of that tree's TPZ.</p> <p>Under AS 4970-2009, if the impact is less than 10% of the TPZ, it is not considered to be a significant impact. Whilst the Project will cause direct impacts for this one tree, the impacts would not be significant.</p> <p>The Project will therefore not significantly impact this one tree.</p> <p>As the Project's design will only impact around 5-6% of the TPZ of one tree, this is not considered to be a significant impact.</p> <p>A buffer zone would be demarcated and signed under guidance from an arborist to protect the driplines of the two Cypress trees that are included within the Weetangera Cemetery Listing. For the single Cypress tree which will experience impacts to around 5-6% of its TPZ, appropriate</p>

Agency	Comment	Response # (PA-EIS)	
			<p>protection demarcation and signage would be put in place under guidance from an arborist to ensure significant impacts are not caused for this Cypress tree.</p> <p>Additional text has been added to Section 5.4.4 of the EIS to this effect.</p>
<p>ACT Heritage Council</p>	<ul style="list-style-type: none"> The Final EIS must clarify whether the project may diminish the heritage significance of the Kama Woodland/Grassland through impacts to Box Gum Woodland, noting the inconsistent conclusions of Past Traces (2021) and the Biodiversity Impact Assessment. If the project would diminish the heritage significance of the Kama Woodland/Grassland, the Final EIS must also describe how these impacts will be avoided, minimised and mitigated. 	<p>#42</p>	<p>A Statement of Heritage Effects has been prepared and is provided as Section 4 of the CHA.</p> <p>The impact on Kama Woodland is described in this Section 4 as follows:</p> <p><i>Heritage Criteria</i></p> <p><i>An area of Yellow Box-Red Gum Grassy Woodland (an endangered ecological community) that is described as partially modified and retains good species diversity and habitat complexity, including the number of mature age and old growth trees that provide a high density of hollows and other habitat suitable for hollow-dependent animals (such as bats, parrots and treecreepers)</i></p> <p>1.16ha of the BGW would be affected within the road reserve. This equates to 0.75% of the Kama Woodland and would not have a significant impact on the extent, diversity or significance of listing.</p> <p>An area of Natural Temperate Grassland (an endangered ecological community)</p> <p><i>No grassland is present within road corridor and no impact to values would result.</i></p> <p>The natural boundary (an ecotone) between two endangered ecological communities (Yellow Box-Red Gum Grassy Woodland and Natural Temperate Grassland) that is now rarely found in the ACT and demonstrates the landscape</p>

Agency	Comment	Response # (PA-EIS)	
			<p>location of the zone of cold air drainage that is often associated with the boundary</p> <p><i>Not present within road corridor and no impact to values would result.</i></p> <p>Habitat for many native plant and animal species including several threatened species: the Brown Treecreeper, Varied Sittella, White-winged Triller and Pink-tailed Worm Lizard.</p> <p><i>No listed species identified within road corridor – pre clearing surveys and retention of habitat trees will be implemented for project.</i></p> <p>A zone of ecological connectivity between the lower Molonglo River and The Pinnacle (south Belconnen Hills) with a high level of ecological integrity of the area's natural values within a landscape that is mostly highly altered.</p> <p><i>Partially impacted by road widening – mitigation measures such as underpasses, overhead paths and fauna friendly lighting will be implemented by the project – no significant impact.</i></p> <p>As a result of the background review, assessment of landforms and current condition, only minor heritage impacts are anticipated from the proposed road duplication works to the Kama Woodland Reserve. These heritage impacts are not considered to be significant. No impacts will occur to the Aboriginal or historical heritage sites, if the management recommendations developed for the project and provided in the following section are implemented.</p> <p>Relevant management measures have been recommended. Section 5.4 of the EIS has been updated to reflect this information.</p>

Agency	Comment	Response # (PA-EIS)	
ACT Heritage Council	The project CHA must also be further revised to address the above, and if impacts to Aboriginal places may result, further consultation with RAOs on proposed management outcomes is required.	#43	No impacts would occur for PADS.
ACT Heritage Council	Additionally, should the above establish that the project would damage Aboriginal places or diminish the heritage significance of the Weetangera Cemetery and/or the Kama Woodland/Grassland, a SHE application for the project will be required under Section 61G of the Heritage Act 2004. In accordance with Council policy, any SHE application should be made prior to the DA submission for the project.	#44	Statement of Heritage Effects is provided as Section 4 of the CHA.
ACT Fire & Rescue	No concerns or comments.	#45	Nil response required.
Conservator of Flora and Fauna	Overall, the draft EIS as it is currently presented does not sufficiently demonstrate, with supporting evidence, that the duplication of the road achieves the best environmental outcome for biodiversity corridors and movement, nature reserve/offset management and water quality and stormwater management. More detailed responses to the draft EIS are provided below.	#46	This has been updated throughout the EIS.
Conservator of Flora and Fauna	<p>Biodiversity corridors and movement</p> <ul style="list-style-type: none"> Further discussion is required as to why a land bridge can't be implemented. connecting Kama and the pinnacle as an offset measure. It would be valuable to demonstrate that this was considered and justification provided as to why this option was rejected. 	#47	<p>Refer to Section 2.4.1 of the EIS.</p> <p>Provision of a fauna bridge at this location is planned for consideration under a Future Feasibility Study. Further investigations must be undertaken to demonstrate the additional benefit of this structure in the context of additional land clearing being required to support it.</p> <p>In the meantime, TCCS remains committed to continuing its engagement with the Conservator regarding establishment of a direct offset for the Project as its first choice of offset (most likely west of the Kama Nature Reserve). TCCS also remains committed to the establishment of two box culvert and one rope bridge fauna crossings.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> If a land bridge is not a viable option for connectivity, then two suitable culvert structures will be required to fitted out for wildlife access. The existing culvert will 	#48	TCCS remains committed to providing two box culverts and a rope bridge to support a range of ground dwelling and arboreal/avifauna safely crossing the road, in addition to the

Agency	Comment	Response # (PA-EIS)	
	only require fencing to be removed, addition of some woody debris at ground/mid level and a possum walkway.		installation of additional wildlife fencing to help reduce the instances of roadkill along this section of the road corridor.
Conservator of Flora and Fauna	<p>Establishment of an offset</p> <ul style="list-style-type: none"> Further details are required on the proposed offset site to the west of Kama nature Reserve, including number of hectares, specific location, management and Public Land/IUCN reserve status. Without knowing these details it is difficult to comment on the suitability of all the proposed mitigation measures. An offset strategy still needs to be developed and I assume this information will be included within this document. 	#49	Refer to Section 5.2.4 of the EIS.
Conservator of Flora and Fauna	<p>Water quality and stormwater management</p> <ul style="list-style-type: none"> Stormwater will discharge into Deep creek pond once the pond has been established. Will the timing of the construction works align and if not, how will stormwater be managed until the pond is available as the receiving environment? 	#50	<p>As a result of the duplicated road, the area of hardstand would increase and there would be an associated minor increase in peak stormwater runoff. The Project would maintain or increase the stormwater drainage provisions to manage the surface water for events up to the one percent AEP, while also providing additional protection during and following major storm events. As such, there should be no change with regard to the risk for erosion and scour at the stormwater discharge points or potential for sediment discharge and pollution.</p> <p>The existing transverse drainage systems under the proposed upgrade would be retained where practically possible to ensure consistency in the flow regime between existing and post-developed conditions. As such, there would only be a minor change in flow attenuation between the present day and post construction. The drainage plans provide the details and locations of the proposed culverts to protect the road from flooding for events up to 1% AEP.</p> <p>Deep Creek is not being used as a water treatment or attenuation facility in the updated drainage design. Deep Creek will still receive runoff from the portion of the road reserve within its catchment area as it is a downstream facility but this runoff will not be included in its treatment volumes.</p>

Agency	Comment	Response # (PA-EIS)	
			<p>Where kerbs and gutters are provided, the stormwater runoff from the road surface would be collected in sumps which would then discharge into vegetated swales within the road verge. The proposed section of the road falls within Deep Creek catchments and the runoff from the road catchment will directed through vegetated swales for water quality treatment and eventually flow into Deep Creek.</p> <p>Additional text has been provided in Section 5.7.6 of the EIS.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Section 5.7.5. Most notably, R7 of the Water Sensitive Urban Design (WSUD) code identifies the targets for stormwater quality improvements. These targets have not been met. Please include an appropriate WSUD approach needs to be adopted to meet the code requirements. 	#51	<p>ACT Government Waterways: Water Sensitive Urban Design General Code (February 2020) outlines the reduction of the pollutants target. for major road development. The targets are also consistent with ACT Government Municipal Infrastructure Standards 08 Stormwater, MIS08, April 2019.</p> <p>The design was modelled using Model for Urban Stormwater Improvement Conceptualisation (MUSIC) Version 6 software to determine the water quality reduction factors for the project. The design was reviewed and updated from PSP to improve water quality outputs of the project by isolating road pavement runoff from clean water runoff from external catchments where possible and treating pavement runoff in grass channels. The grass channels help to remove pollutant particles as the runoff passes through the grassed area, the contaminants are removed via filtration and infiltration. The grass channel approach will also continue the current characteristics of WHD and provide ease of maintenance.</p> <p>The water quality reduction target for the detailed design, considering new pavement area only, is compliant with the WSUD General Code R7 requirements. Refer EIS 5.7.5.</p> <p>Additional text has been provided in Section 5.7.6.2 of the EIS.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Section 5.7.4. Climate change does not appear to be appropriately addressed in the WSUD context. This is required. The Australian Rainfall and Runoff guidelines (ARR) give a methodology that could be employed. 	#52	<p>Climate change analysis was conducted on the proposed drainage network. The rainfall intensities were increased by 20% to account for the potential future effects of climate change in accordance with Section 3.1.4 of ACT</p>

Agency	Comment	Response # (PA-EIS)	
			<p>Government Municipal Infrastructure Standards 08 Stormwater, MIS08, April 2019 (MIS08). Analysis found no ponding onsite, and surface flow for the 20% AEP flood widths remained within limits stipulated in MIS08 and AAR.</p> <p>Additional text has been provided in Section 5.7.6.1 of the EIS.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Section 5.7.7. The proposed mitigations for water quality impacts during construction are listed as having high effectiveness. Contemporary evidence should be provided to support this conclusion. ACT Healthy Waterways would provide evidence to the contrary, and under the current required methods for risk assessment, current contemporary controls cannot be supported as being effective. 	#53	As provided in responses 50-53 above.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Early on in the document, the Molonglo River is described as flowing in an easterly direction, into Lake Burley Griffin. This needs to be corrected. 	#54	Updated to refer to the River as flowing west and north-west towards the ACT/NSW border.
Conservator of Flora and Fauna	<p>Comments of the mitigation measures: Table 5-14</p> <ul style="list-style-type: none"> First line – the impact of increased exposure of key areas to invasive animals has not been mitigated. Timing for other mitigation approaches will be prior to, during and post-construction to be effective. 	#55	<p>The following are provided as mitigation measures in Sections 5.2.4 and 7 of the EIS:</p> <p>Rubbish removal is to be undertaken prior to construction and throughout construction in retained areas of vegetation in the road reserve.</p> <p>Revegetation and offset plantings proposed as part of the Project will assist in supporting habitats which are favoured by native species, such that the Project will not result in feral species colonising land within the study area over the long-term.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Second line – increased visitation/recreation is required to be addressed here as a result of increased access by different users (such as offroad cyclists). 	#56	Further information has been added.

Agency	Comment	Response # (PA-EIS)	
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • Third line – the proposed mitigation measures are not considered to be sufficient to mitigate the risks identified, particularly loss of habitat and changed hydrological processes resulting in erosion and habitat shifts. Please review this section. 	#57	Further mitigation measures have been added.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • Fourth line – please describe how the offset could be managed to provide both a fire and invasive species buffer, and suitable habitat for threatened fauna. Please also address habitat replacement for other impacted species. 	#58	References to native grasslands offsets being used as a bushfire buffer have been removed from the EIS commitments, as this is not a reasonable outcome to achieve using the mix of native grass species required at the location.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • Fifth line – Remove reference to loss of connectivity from this line as this is not addressed until the following line. Please also refer to the consequences of unapproved clearing of important habitat under relevant legislation, and identify who would be responsible in this circumstance (including un-approved impacts on aquatic and riparian habitats due to erosion, inadequate sediment control, or contaminated waterways). Please also provide more detail on how the direct impacts on a range of fauna species will be avoided. 	#59	<p>Refer to Table 5-14.</p> <p>Also refer to Section 5.6.3.1: the CEMP would also outline contractor and other personnel responsibilities and actions in the event of an unforeseen environmental harm incidents, including first response and agency notification requirements.</p> <p>The design of the Project and the Project objectives have taken into consideration the following requirements:</p> <ul style="list-style-type: none"> • Retain as many hollow bearing trees as possible • Design the overall road width to be as narrow as possible between the two Nature Reserves • Have no more environmental impact than is necessary to deliver an optimum road design for this section of the WHD corridor • Protection the two Nature Reserves during construction and minimise ongoing impacts to them.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • Sixth line - Loss of connectivity and habitat fragmentation in this important landscape is considered the major environmental impact of this project which will be severe and permanent if not mitigated adequately. Please provide detailed discussion on how underpasses, culverts and potential wildlife overpasses might be utilised to ensure that landscape connectivity is maintained for the full suite of native species present, to ensure they maintain adaptability to climate change and 	#60	Further details have been added against this item in Table 5-14.

Agency	Comment	Response # (PA-EIS)	
	<p>access to required resources including appropriate habitat features, food and water, and potential mates. Please add a recommendation that appropriate habitat structures are installed to facilitate wildlife movement through underpasses where possible (e.g. poles, logs or other habitat to enable small animals to traverse safely). The effectiveness of these measures are currently not known, so should not be identified as 'high' without further investigation.</p>		
<p>Conservator of Flora and Fauna</p>	<ul style="list-style-type: none"> Seventh line - Please also add requirements to monitor the effectiveness of fencing and other approaches to the list of requirements to enable informed decision making in future, and recommend funding to enable existing data held by EPSDD on kangaroo-vehicle collision incidents to be analysed to inform future road design. Please also refer to the mitigated risk to people of fencing based on the increasing number of deer (which may be hit on the road) in this area. 	<p>#61</p>	<p>Section 5.2.3.6 provides further information on feral animal concerns with respect to the Project. Section 5.2.3.3 makes reference to the risks to road users from fauna vehicle strike.</p> <p>The requirements to monitor the effectiveness of exclusion fencing and provide funding for Kangaroo-vehicle collision data analysis have been added as a mitigation measure into Sections 5.2.4 and 7</p>
<p>Conservator of Flora and Fauna</p>	<ul style="list-style-type: none"> Eighth line – Please provide comment as to how noise and light impacts will be mitigated, as well as options for maintaining aquatic and riparian corridors. 	<p>#62</p>	<p>As explained within Section 5.2.3.8 of the EIS, it is not considered necessary to provide lighting-specific mitigation measures to manage potential impacts to species. Further details are set out within Sections 5.3.3.7 and 5.2.3.3 of the EIS. A Spill Light Assessment has also been added as Appendix I of the EIS.</p>
<p>Conservator of Flora and Fauna</p>	<p>General comments</p> <ul style="list-style-type: none"> It is unclear how many mature and hollow bearing trees are likely to be impacted/removed by the works. Seven hollow bearing potential superb parrot breeding trees are identified for removal, however elsewhere the documents refer to 33 hollow bearing trees within the study area. This needs to be clarified. 	<p>#63</p>	<p>EIS has been clarified to refer to seven hollow bearing trees as being impacted.</p> <p>Superb Parrots that have been observed flying over the study area, are likely to be part of the important population that occurs in the ACT. No individuals were observed utilising the study area for foraging, although suitable habitat is present in the Grassy Woodland and planted woodland. Despite the presence of hollow-bearing trees, some of which may have suitably sized hollows, the Superb Parrot is unlikely to breed within the study area.</p> <p>Superb Parrots that have been observed flying over the study area, are likely to be part of the important population that occurs in the ACT. No individuals were observed</p>

Agency	Comment	Response # (PA-EIS)	
			<p>utilising the study area for foraging, although suitable habitat is present in the Grassy Woodland and planted woodland. Despite the presence of hollow- bearing trees, some of which may have suitably sized hollows, the Superb Parrot is unlikely to breed within the study area. These are therefore considered to be seven <i>potential</i> breeding hollows only for this species.</p> <p>The Superb Parrot breeds in tree hollows with specific dimensions, most often in Blakely's Red Gums. Seven <i>potential</i> breeding hollows for this species will be removed. Despite the presence of hollow-bearing trees, some of which may have suitably sized hollows, the Superb Parrot is unlikely to breed within the study area due to its proximity to the road corridor. It is recommended that the size of these hollow entrances which could potentially support Superb Parrot breeding be confirmed and considered as part of the Draft Offset Strategy and final Offset Management Plan. This would establish whether any compensatory nest box habitat needs to be established for this species.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Section 5.2.4 (Mitigation) – replace ‘would’ and ‘should’ with ‘will’ and remove all reference to ‘where possible’. This must be corrected elsewhere in the EIS where noncommittal language is used. 	#64	<p>It is common practice in EIS writing throughout most Australian jurisdictions to use the conditional tense when referring to mitigation commitments. Otherwise, it sends a message to the community that certain things “will” be done, regardless of whether they obtain development approval first. Use of the conditional tense assures the reader that certain activities will only be undertaken <i>if</i> project approval is granted first.</p> <p>Nevertheless, at the request of the Conservator, use of the conditional tense has been changed to a simple future tense as this is the preference of the ACT Conservator.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Under “Native Grassland” Further discussion is required on the role of these small patches as ‘stepping stones’ for connecting other areas of high quality grassland habitat. Also the basis for the statement that these habitat patches are too small to be considered as habitat for native species should be provided. 	#65	<p>This Native Grassland section has been updated as requested.</p>

Agency	Comment	Response # (PA-EIS)	
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Under "Exotic grassland" The latter statement is incorrect. Striped legless lizards regularly use this habitat type, as do a range of other reptile, bird, small mammal, invertebrate and amphibious species. Exotic grassland can be important refugia for a wide host of grassland fauna during drought. In fact, kangaroos rarely use this type of habitat where native habitat with shorter, more palatable grass is available. Small grassland granivorous birds also regularly use this habitat, as do some declining woodland species. Longer exotic grassland areas are often the only places in nature reserves where evidence of small mammal activity is identified (although these are most often introduced species). Exotic grassland and other habitat may also provide a critical connectivity corridor for a range of species, even if it is not suitable as core habitat. This should also be discussed. <p>Further discussion on the role of grassy woodland, planted woodland and riparian habitat in facilitating landscape connectivity should be added, including consideration of aquatic invertebrates (e.g. yabbies) and reptiles (e.g. turtles) from water bodies in the Belconnen nature reserves down to the Molonglo river and vice versa. The specific capacity of woodland habitat patches to provide connectivity for non-avian species such as arboreal mammals (e.g. possums, gliders, bats), native predators (e.g. quolls) and insect pollinators should be considered.</p>	#66	Relevant updates have been made to "Exotic Grassland" under Section 5.2.2.1.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Under 5.2.2.2 other ecological features, The role of underpasses and culverts in providing connectivity for other taxon should be considered. Species groups might include amphibians, reptiles, crickets and grasshoppers, terrestrial mammals (including small, medium and large species), fish and crays. <p>Sections 5.2.2.1 and 5.2.2.4 are both titled 'habitat connectivity' and should be combined.</p>	#67	<p>Further information regarding these riparian habitat features is now provided in Section 5.2.2.2 of the EIS.</p> <p>These two separate Habitat Connectivity sections in the EIS have been combined.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> The document states: " WHD is currently about 18m wide where is intersects the two reserves. While it is an impediment to connectivity, fauna are likely to be able to traverse the road corridor via flight or by crossing the road surface" This is a vast oversimplification. Please refer to taxa list above as a basis for considering the capacity of fauna to navigate across this road. 	#68	Refer to updated EIS Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.

Agency	Comment	Response # (PA-EIS)	
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Under Fauna injury or mortality (vehicle collision) – corrections are required. Kangaroos are managed in the ACT under the Eastern Grey Kangaroo: Controlled Native Species Management Plan. Further discussion of the risks to kangaroos and people’s safety, and options identified to reduce the risk of kangaroo-vehicle collisions, are required in this document. 	#69	Refer to updated EIS Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Section 5.2.33. The last point should be rephased as it is not clear what is meant by this statement. Please rephrase for clarity. A loss of capacity to adapt to a changing climate should also be added to this list. 	#70	Potential increase in genetic isolation recognised in bullet point list under sub-heading “Habitat Fragmentation.” Decreased ability to adapt to a changing climate added as last bullet point in this list.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Table 5-9 Movement patterns: reptiles. Few reptile species would be expected to safely cross a road of 80m width, particularly smaller species including threatened species. As such, this should be identified as certain, permanent and potentially severe if opportunities to maintain movement corridors and gene flow are not put in place. This risk should be identified for all flightless species, and some smaller flying species which are unlikely to be able to traverse an 80m span. Mammals are listed twice in this table. Amphibians aren’t mentioned at all. <p>The increased width of the road is likely to have significant fragmentation impacts for a range of species and hence place them all at higher risk of local declines or extinction.</p>	#71	Refer to updated EIS Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Foraging patterns: <p>Mammals: Please provide basis for decreased insect numbers given increased lighting infrastructure. Birds: Please consider risks to scavenging birds taking advantage of road kill.</p>	#72	Potential fauna strike matters are considered further in Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Animal-vehicle collision: <ul style="list-style-type: none"> Please add echidnas, wombats, red-necked wallaby, spotted-tail quoll, raptors (Wedge Tailed Eagle, Little Eagle) and frogs to list of potentially impacted fauna Please add some discussion of how these risks will be mitigated 	#73	Potential fauna strike matters are considered further in Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Additional, relevant species have been added to this discussion in the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.

Agency	Comment	Response # (PA-EIS)	
	<p>o Please add anticipated increase in road traffic volume over time, based on development of new suburbs, and comment on the relationship to the risk of road kill.</p>		
<p>Conservator of Flora and Fauna</p>	<ul style="list-style-type: none"> • Weeds and exotic fauna: <p>o Suggest combining section 5.2.3.4 and 5.2.3.6, as one is about weeds and the other about pest animals.</p> <p>o Consider the use of linear features by introduced predators (cats and foxes) and the impacts of the larger road and active travel route with increased proximity to nature reserves and important ecological values.</p> <p>o Please seek updated information regarding pest animal management in nature reserves.</p>	<p>#74</p>	<p>The two separate section numbers have been kept as-is. Section 5.2 of the EIS is already quite long, and there are many third-order headings which are becoming difficult to navigate. The use of numbered section headings assists with this navigation.</p> <p>Further information and references have been provided in Section 5.2.3.6 and Appendix D of the EIS regarding feral animal species.</p>
<p>Conservator of Flora and Fauna</p>	<p>Risk Assessment</p> <p>Table 4.4 risk assessment require reconsideration of some elements as per below:</p> <ul style="list-style-type: none"> • “Clearing of vegetation results in a loss of connectivity through fragmentation in the landscape, or obstructing local movement corridors” <p>Added to this is the construction of barriers to movement, including safety railings, wider paved roads, more lighting, and disrupted water courses. As such, it’s not just a loss of vegetation/habitat but also the construction of physical or behavioural barriers which impact structural and functional connectivity for wildlife. These impacts I would suggest are likely if not almost certain. Some of the points made in ‘noise, vibration and lighting’ with consideration for people and human neighbours should be applied to the much more sensitive and closer proximity wildlife populations.</p>	<p>#75</p>	<p>Added to Section 4.3 of the EIS.</p>
<p>Conservator of Flora and Fauna</p>	<ul style="list-style-type: none"> • “Vegetation clearing activities during construction disturb native animals and increase the potential for vehicle strike” <p>The increased risk of disturbing native animals and increased risk of vehicle strike is an issue for wildlife and people alike. The construction of this road through key connectivity areas is will not just cause temporary increases in road kill due to disturbance (although this is also possible), but rather having a greater road with more traffic through this area will increase road kill risks unless suitable alternative</p>	<p>#76</p>	<p>Potential fauna strike matters are considered further in Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.</p>

Agency	Comment	Response # (PA-EIS)	
	crossing places are provided and barriers are installed elsewhere. The likelihood here should be revised accordingly.		
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • “Incursion of vehicles into areas of environmental significance causing damage to or destruction of habitat” the increased noise and lighting impacts on surrounding natural habitat have not been addressed and should have been. Perhaps the ‘Incursion of vehicles’ one could be extended to include ‘incursion of vehicles, light, noise, invasive species and increased recreational use stemmed by greater human access into areas of environmental significance....’ Should be almost certain. 	#77	This text has been added to the table.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • “Potential changes to groundwater availability due to vegetation removal or excavation including impacts on groundwater dependent ecosystems and water users within the catchment” <p>Further consideration of climate change impacts may lead to changes to groundwater availability having a major consequence. Please review and consider this.</p>	#78	This text has been added.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> • Can the following items please include further information and justification: Table 5-12 (now Table 5-16) Table 5-15 - (now Table 5-20) Table 5-17 - (now table 5-22) 	#79	<p>Further information has been provided in Table 5-12 based off of the Assessments of Significance contained in Appendix C of Appendix D to the EIS.</p> <p>Table 5-15 is now referred to as table 5-20. Additional information is provided for some new risks as suggested by the Conservator.</p> <p>As explained within Section 5.2.3.8 of the EIS, it is not considered necessary to provide lighting-specific mitigation measures to manage potential impacts to species. Further details are set out within Sections 5.3.3.7 and 5.2.3.3 of the EIS. It is considered that further details are not required within the residual risk discussion of the EIS as it relates to lighting. A Spill Light Assessment has also been added as Appendix I of the EIS.</p>

Agency	Comment	Response # (PA-EIS)	
Conservator of Flora and Fauna	<p>For including as potential conditions in the Development Application:</p> <ul style="list-style-type: none"> No artificial lighting is permitted adjacent to any Nature Reserves, the Kama buffer, proposed offset area or key connectivity corridors. 	#80	<p>TCCS is happy to accept such reasonable and feasible mitigation measures.</p> <p>ACT Government stakeholders have requested that the full length of the William Hovell Drive duplication project area, and the shared path, have streetlights, that meet the Australian Standard AS/NZS 1158 '<i>Lighting standards for roads and public spaces</i>'. Street lighting is needed for safety – with respect of accidents with other vehicles, and visibility of wildlife.</p> <p>Detailed investigations have been undertaken to design a lighting system that meets the standard, assesses the extent of light spill into the nature reserves and other adjacent lands and measures to reduce this where possible including directional lighting, spacing, and physical structures (eg road batters).</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Native mature trees removed by the works must be replaced at a ratio of 1:10. Location of these plantings must be considered as part of the rehabilitation/landscaping plan and may include areas within the proposed offset area. 	#81	<p>Committed to in Sections 5.10.4 and 7 of the EIS.</p> <p>To mitigate these impacts, it is proposed to plant new evergreen trees alongside the locations where existing trees would be removed. Indeed, where possible, established trees would be retained to provide landscape screening. A schedule of additional plantings would therefore be provided to soften the impact on the predominantly rural landscape.</p> <p>Native, mature trees removed as a result of the Project would be replaced at a ratio of 1:10. Native shrubs removed as a result of the Project would be replaced at a ratio of 1:4. The locations of these plantings must be considered as part of the landscaping and offset plans prepared for the Project.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Native shrubs removed by the works must be replaced at a ratio of 1:4. Location of these plantings must be considered as part of the rehabilitation/landscaping plan and may include areas within the proposed offset area. 	#82	<p>Committed to in Sections 5.10.4 and 7 of the EIS.</p> <p>To mitigate these impacts, it is proposed to plant new evergreen trees alongside the locations where existing trees</p>

Agency	Comment	Response # (PA-EIS)	
			<p>would be removed. Indeed, where possible, established trees would be retained to provide landscape screening. A schedule of additional plantings would therefore be provided to soften the impact on the predominantly rural landscape.</p> <p>Native, mature trees removed as a result of the Project would be replaced at a ratio of 1:10. Native shrubs removed as a result of the Project would be replaced at a ratio of 1:4. The locations of these plantings must be considered as part of the landscaping and offset plans prepared for the Project.</p>
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Dense <i>Lomandra longifolia</i> and shrub plantings must be strategically located along the boundary of the Kama Nature Reserve (and buffer) and Pinnacle Nature Reserve to provide for habitat connectivity and reduce the spread of African Lovegrass and other invasive plant species. 	#83	This has been added as a mitigation measure to Sections 5.2.4 and 7 of the EIS.
Conservator of Flora and Fauna	<ul style="list-style-type: none"> Two suitable culvert structures will be required to be fitted out for wildlife access. The culverts (including the existing culvert) will require fencing to be removed, addition of some woody debris at ground/mid level and a possum walkway. 	#84	Incorporated into the mitigation measures in Sections 5.2.4 and 7 of the EIS.
ACT Health / Health Protection Service	The HPS has reviewed the documents and advises the applicant that the HPS supports the implementation of measures detailed under section 5.6.4 of the Draft EIS document including:	#85	Nil response required.
ACT Health / Health Protection Service	<ul style="list-style-type: none"> Remediation of identified contaminated sites prior to construction; 	#86	Whilst disturbance of currently unidentified contaminated soils during construction is possible, this is not necessarily anticipated for the Project. Sections 5.6.4 and 7 of the EIS recommend undertaking further geotechnical and contamination assessments, including detailed assessment of fill.
ACT Health / Health	<ul style="list-style-type: none"> The development of an Unexpected Find Protocol (UFP) under the framework of a Construction Environmental Management Plan; and 	#87	Unexpected Finds Protocol is included in the mitigation measures in Sections 5.6.4 and 7 of the EIS.

Agency	Comment	Response # (PA-EIS)	
Protection Service			
ACT Health / Health Protection Service	<ul style="list-style-type: none"> The removal of fly-tipped waste (including suspected asbestos-containing materials) be carried out prior to construction. 	#88	Included in the mitigation measures in Sections 5.6.4 and 7 of the EIS.
TCCS	'Supported' subject to compliance with the following 'Conditions'	#89	Nil response required – introduces subsequent detailed comments
TCCS	<p>TRAFFIC NOISE</p> <p>1. Modelling is based on both current and proposed road surfaces. The current is with a 14mm chip seal (+3dba) and the proposed using a 7mm chip seal / DBM (+2dba) – effectively lowering the noise modelling and outputs by 1dba at project completion. However, this may restrict Road Maintenance resurfacing options in the future, as using a 14mm chip seal would increase noise by +1dba. The Proponent is to consult with Road Maintenance/TCCS over their future resurfacing options, and advise whether this would be an acceptable treatment – or an added future maintenance cost.</p>	#90	The EIS as section 5.5.4.2 identifies that operational noise management measures including the low noise road pavement surface are to be investigated.
TCCS	2. Similarly, and discussed well (pros and cons) in the report, the solution to use an OGM would reduce help to reduce noise levels but result in a future, added maintenance cost. TCCS strongly believes that Noise walls have a greater reduction in noise levels, and provides an option to resurface in an OGM at a later date if required. The Proponent is recommended to undertake further analysis and advise if the noise walls solution is acceptable.	#91	The EIS as section 5.5.4.2 identifies that operational noise management measures including the low noise road pavement surface are to be investigated.
Evoenergy	As we already informed to the consultant, we would like to request that 6 x 150mm and 1 x 63mm conduits be installed along the road verge, preferably on the eastern side of the road?	#92	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
Icon Water	<p>Environment team</p> <ul style="list-style-type: none"> Dependant on the location for relocation of the new Icon Water mains, at the intersection of John Gorton Drive and William Hovell Drive there may be certain environmental requirements for Icon Water. However considering the locations of the pipes and the potentially ecologically sensitive areas surrounding such as 	#93	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.

Agency	Comment	Response # (PA-EIS)	
	protected woodland etc. it is unlikely to change the current situation where the infrastructure already sits within protected woodland.		
Icon Water	<ul style="list-style-type: none"> Icon Water should ensure that recommendations regarding contamination are followed during construction i.e. fill brought into site is only clean fill, pipe material backfill is clean, and excess contaminated soil is not stockpiled over existing and locations of future relocation of Icon Water assets. 	#94	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
Icon Water	<ul style="list-style-type: none"> Any contaminating activity that occurs over/adjacent to Icon Water infrastructure will be the responsibility of the polluter to clean up and not of Icon Water. 	#95	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
Icon Water	<ul style="list-style-type: none"> Any spills of chemicals near or over Icon Water assets should be reported to Icon Water. 	#96	This would be incorporated into the proposed CEMP.
Icon Water	<p>Developer Services</p> <ul style="list-style-type: none"> We are working on the design with developer. However there is no relocation of water mains. 	#97	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
Icon Water	<p>Building Approvals</p> <ul style="list-style-type: none"> Any work(s) that is likely to impact on the Icon Water infrastructure must have Icon Water acceptance prior to any work being undertaken. 	#98	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
Jemena	On behalf of Evoenergy Gas, Jemena have reviewed the William Hovell Drive Duplication Draft EIS (EIS202100014) and have no comment to make.	#99	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
NCA	The proposed works are within the Hills, Ridges and Buffers Spaces of the National Capital Plan. The proposed upgrade is not inconsistent with the National Capital Plan.	#100	Consultation will be ongoing with utility providers as the project design is further developed to ensure impacts can be reasonably mitigated.
SLA	The Suburban Land Agency has reviewed the William Hovell Drive draft EIS, and advise that we have no comments. We continue to work with TCCS as they progress the detailed design, and we are satisfied that the EIS and the design of WHD is addressing all of our concerns.	#101	Consultation will be ongoing with agency as the project design is further developed to ensure impacts can be reasonably mitigated.

Agency	Comment	Response # (PA-EIS)	
Infrastructure Projects	<p>I have reviewed sections of the WHD Draft EIS and have consulted with other people in the directorate regarding some concerns we have around the water quality protection provisions. Our understanding is that the project needs to comply with the requirements as specified in R7 of the WSUD code.</p> <p>We are not convinced that Deep Ck pond, currently under detailed design, has been designed to cater for water quality requirements from the WHD duplication project. The stated water quality reductions of 11% for TP and TN in the draft EIS look to be very low compared to the code requirements of 45% and 40%. We believe the full 'developer targets' would apply.</p> <p>The GA plans for the project show no ponds or wetlands. Swales look like the only water quality 'measure' being applied to the project.</p> <p>We are not aware of any specific requirement on the Deep Creek Pond design to cope with increased pollutant loads from the duplication of WHD, and are not aware of any contact between the WHD duplication design team and the Deep Creek project team. The GHD 2015 report, referenced in the Draft EIS, has been superseded by current work that GHD is undertaking on the water quality design aspects of the pond. We are also unaware of any changes to the pond design as a result of the WHD duplication project.</p> <p>Can you please confirm if/when you have been in contact with the SLA and/or GHD to confirm the pond will cater for a portion of the water quality improvement required for the WHD duplication project and whether the overall 'regional' (higher) water quality target reductions will be met for the Deep Creek catchment.</p>	#102	<p>The EIS figures have been updated based on more accurate modelling.</p> <p>ACT Government Waterways: Water Sensitive Urban Design General Code (February 2020) outlines the reduction of the pollutants target. for major road development. The targets are also consistent with ACT Government Municipal Infrastructure Standards 08 Stormwater, MIS08, April 2019.</p> <p>The design was modelled using Model for Urban Stormwater Improvement Conceptualisation (MUSIC) Version 6 software to determine the water quality reduction factors for the project. The design was reviewed and updated from PSP to improve water quality outputs of the project by isolating road pavement runoff from clean water runoff from external catchments where possible and treating pavement runoff in grass channels. The grass channels help to remove pollutant particles as the runoff passes through the grassed area, the contaminants are removed via filtration and infiltration. The grass channel approach will also continue the current characteristics of WHD and provide ease of maintenance.</p> <p>The water quality reduction target for the detailed design, considering new pavement area only, is compliant with the WSUD General Code R7 requirements. Refer EIS 5.7.5.</p> <p>Deep Creek is not being used as a water treatment or attenuation facility in the updated drainage design. Deep Creek will still receive runoff from the portion of the road reserve within its catchment area as it is a downstream facility but this runoff will not be included in its treatment volumes.</p>
Infrastructure Projects	<p>Further to above comments, I have received confirmation from SLA (see attached) confirming that they have made no allowance for treating water quality from the WHD duplication project. My key question here is how did SMEC get the impression that Deep Ck pond was going to form part of their treatment train and why did they not confirm this assumption with the designers and client (SLA) for Deep Ck pond?</p>	#103	<p>Deep Creek is not being used as a water treatment or attenuation facility in the updated drainage design. Deep Creek will still receive runoff from the portion of the road reserve within its catchment area as it is a downstream facility but this runoff will not be included in its treatment volumes.</p>

Agency	Comment	Response # (PA-EIS)	
Climate Change Policy	<p>Thank you for the opportunity to provide input into your consideration of the draft EIS for the project William Hovell Drive Duplication.</p> <p>Our comments relate to the scope requirements for an EIS to consider the emissions reduction targets of the ACT, to support your final assessment.</p>	#104	Nil response required.
Climate Change Policy	<p>The ACT's Climate Change and Greenhouse Gas Reduction Act 2010 sets the ultimate target of net zero emissions by 2045 and interim emissions reduction targets for 2025, 2030 and 2040. Transport emissions are the single largest source of ACT emissions. So it is important to consider how transport infrastructure projects support the achievement of the ACT's emissions reduction targets.</p>	#105	Section 5.10 has been updated with further assessment.
Climate Change Policy	<p>The scope document requires that:</p> <p><i>...the EIS must address the contribution the proposal will make to reducing greenhouse gas emissions and meeting the legislated target for a net zero emissions Territory (by 2045 at the latest).</i></p>	#106	Section 5.10 has been updated with further assessment.
Climate Change Policy	<p>The draft EIS does not address this scope requirement. The assessment does not quantify the contribution the proposal will make to meeting the legislated emissions reduction target. The commentary on emissions impacts is limited to the construction phase, not the operational phase.</p> <p>Where comments on emissions impacts are provided they are qualitative and not related to the achievement of the legislated emissions reduction targets.</p>	#107	Section 5.10 has been updated with further assessment
Climate Change Policy	<p>While the road project itself does not generate emissions during the life of the project, the use of roads by internal combustion engine vehicles is the largest source of ACT emissions. Providing analysis on the emissions impact of the traffic use resulting from the duplication would support community confidence in this project and the ACT's ability to meet the emissions reduction targets.</p>	#108	Section 5.10 has been updated with further assessment
Climate Change Policy	<p>In general, road projects are undertaken to improve traffic flows which have direct benefits in terms of reductions in traffic congestion, idle time or stop/start traffic. To the extent that this improvement in traffic flow results in reduced fuel use,</p>	#109	Section 5.10 has been updated with further assessment

Agency	Comment	Response # (PA-EIS)	
	<p>relative to a base case of no duplication project, an emissions benefit could be quantified. This could then be used to provide an assessment in the EIS of the contribution the proposal makes to the legislation emissions reduction targets. The analysis would also need to consider whether the improvement in the road results in any switching from active travel to passenger vehicle travel, which would mitigate some of the emissions benefit if it occurs.</p>		
<p>Climate Change Policy</p>	<p>The draft EIS also notes that emissions will be created during construction but does not estimate the emissions from this work. The ACT's emissions framework considers scope 1 and scope 2 emissions. In the ACT, electricity is 100% renewable meaning that all construction activity powered by electricity is zero emissions (scope 2 emissions are zero). Scope 1 emissions for road projects are likely to come from the use of internal combustion engine vehicles and equipment and emissions produced by the fabrication of construction materials in the ACT. To the extent that the proponent can quantify the fuel saved by using 'fuel-efficient vehicles' this could then be used to comment on the emissions savings during construction.</p>	<p>#110</p>	<p>Section 5.10 has been updated with further assessment</p>
<p>Climate Change Policy</p>	<p>Thank you for the opportunity to provide input into your consideration of the draft EIS. If you would like to discuss our comments please contact myself or the ClimateChange inbox.</p>	<p>#111</p>	<p>Nil response required. closing statement</p>
<p>Climate Change Policy</p>	<p>I would like to provide an additional comment on the scope requirement and the draft EIS to:</p> <ul style="list-style-type: none"> • Consider the Climate Change Strategy 2019-25 <p>Action 5.6 of the Climate Change Strategy 2019-25 requires that EPSDD and CMTEDD:</p> <p>Ensure all new Government capital works with a budget of more than \$10 million either seek or are consistent with an independent sustainability rating such as an Infrastructure Sustainability rating from the Infrastructure Sustainability Council of Australia (ISCA), or a Greenstar rating from the Green Building Council of Australia or equivalent, and review ratings at least every five years.</p> <p>In order to meet the scope requirement, the EIS should indicate how action 5.6 will be achieved given the likely value of this project.</p>	<p>#112</p>	<p>Section 5.10 has been updated with further assessment</p>

Planning Assessment Summary - EIS202000014

Comment	Response #	Proponent Comment
<p><u>Executive Summary</u></p> <p>The executive summary has not fully described the impacts of the proposal and the proposed mitigation measures. For example, under flora and fauna, the impacts are described in one sentence and impacts to matters of national environmental significance are not described. Under noise and vibration, the impacts of noise during operation are only described as minor. Mitigation measures are not described for any environmental impacts. Please provide a further summary of the impacts and the proposed mitigation measures as outlined throughout the EIS.</p>	#113	The Executive Impact has been updated with further information.
<p>Project description</p> <p>The EIS does not outline any developments currently or already undertaken by the proponent, other persons or entities on the land subject to the proposal. Other developments, such as, road development in the region that may affect the proposal need to be described.</p> <p>The expected construction timeframe is outlined at section 2.2.5 of the EIS. Page 33 of the EIS states that early works would begin in July 2022 and be completed in June 2023, with the main project works being completed in July 2023. Page 32 of the EIS states that the expected work period is 25 months. Please clarify the expected construction timeframes and relate them to the stages as identified in Table 2-2.</p>	#114	Further details added.
<p><u>Alternatives to the proposal</u></p> <p>Four potential options were identified for upgrading the road to four lanes. Option B was selected based on an analysis against six criteria. Only option B, the selected option, has an assessment of matters considered to avoid or reduce potential impacts prior to the selection of the preferred option. Please provide an assessment of options A, C and D against the criteria used to assess alternatives and provide any consideration of matters to avoid or reduce impacts in relation to these options.</p>	#115	Refer to additional information provided in Section 2.4 of the EIS.
<p><u>Legislative and Strategic Context</u></p> <p>Item 4 in Table 3-2 on page 42 (Schedule 4 items) states in the comment column that the current design would have a significant adverse environmental impact on a domestic water supply, water use purpose or prescribed environmental value mentioned in the Territory Plan. Please confirm whether the comment intended to state it would not have a significant impact.</p>	#116	Reference in Section 3.1.1 of the EIS updated to confirm that no impact will occur.

Comment	Response #	Proponent Comment
<p><u>Climate Change</u></p> <p>The EIS does not describe how the proposal will be resilient to climate change, particularly to extreme events of heatwaves, droughts, storms with flash flooding and bushfires. Table 5-37 describes predicted changes in heat, rainfall and fire danger but does not describe how the proposal will be resilient to these. Table 5-37 does not describe predicted changes in flooding or storms. The only mitigation measure provided is increased inspections of infrastructure. Please provide consideration of adaptation measures within the proposal to reduce vulnerability and increase resilience to these extreme events.</p>	#117	Section 5.10 has been updated with further assessment
<p>The EIS does not address impacts on the local microclimate and how the proposal will avoid contributing to urban heat and positively contribute to urban cooling. Information is required on the effect of the increase in hard surfaces and of revegetation (for example, the area of trees planted) and management of offset land that will occur after construction. Provide details on the number of trees or area of vegetation that will be removed compared to the number that will be replaced and if other features of the design of the duplication will avoid urban heating.</p>	#118	<p>Committed to in Sections 5.10.4 and 7 of the EIS.</p> <p>To mitigate these impacts, it is proposed to plant new evergreen trees alongside the locations where existing trees would be removed. Indeed, where possible, established trees would be retained to provide landscape screening. A schedule of additional plantings would therefore be provided to soften the impact on the predominantly rural landscape.</p> <p>Native, mature trees removed as a result of the Project would be replaced at a ratio of 1:10. Native shrubs removed as a result of the Project would be replaced at a ratio of 1:4. The locations of these plantings must be considered as part of the landscaping and offset plans prepared for the Project.</p>
<p>The draft EIS does not address the contribution the proposal will make to reducing greenhouse gas emissions and meeting the target for a net zero emissions Territory by 2045 at the latest. The commentary on emissions impacts is limited to the construction phase, not the operational phase. Where comments on emissions impacts are provided, they are qualitative and not related to the achievement of the legislated targets. While the road project itself does not generate emissions during the life of the project, the use of roads by internal combustion engine vehicles is the largest source of ACT emissions. Please describe the emissions produced during construction and operation and the impact of these on climate change.</p>	#119	Section 5.10 has been updated with further assessment
<p>Additional assessment is required against all relevant sections of the ACT Climate Change Strategy 2019-2025. The assessment must include a summary outlining whether the proposal is consistent with the strategy. For example, the strategy has a section on transport, and a priority of</p>	#120	Section 5.10 has been updated with further assessment

Comment	Response #	Proponent Comment
the strategy is to ensure infrastructure is resilient to climate change impacts. These sections/priorities should be referenced in the assessment.		
Please provide additional information, in relation to the proposal, against relevant sections of the Canberra's Living Infrastructure Plan: Cooling the City. The targets and actions in the plan are relevant to the proposal and a summary outlining whether the proposal is consistent with the plan is needed.	#121	Section 5.10 has been updated with further assessment
The EIS must also show how the development is consistent with national climate change policies as required by s 8.2.11 of the scoping document.	#122	Section 5.10 has been updated with further assessment
Information on climate change must be included where relevant to sections 3.2 (Legislative and Strategic Context) and 5.10 (Climate change assessment of impacts) of the EIS.	#123	Section 5.10 has been updated with further assessment
<p><u>Other Requirements</u></p> <p>The ACT Transport Strategy 2020 is discussed in the draft EIS, however, not all relevant areas of the strategy were addressed. Please provide additional assessment of the proposal against the strategy specifically for the principles, pathways and making it happen sections of the strategy.</p>	#124	Further text is provided in the EIS.
<p><u>Ecologically Sustainable Development</u></p> <p>The EIS does not fully address how the proposed development demonstrates ecologically sustainable development (ESD), as required by s 6.3.1 of the scoping document. This is to include long-term and short-term considerations related to economic development, social development and environmental protection at local, regional and national scales. The assessment in the EIS only includes an assessment against section 9 of the PD Act and does not address ESD as defined in the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).</p> <p>The response to the requirement for the development to conserve biological diversity and ecological integrity is incomplete. The EIS describes conducting revegetation and offsetting to compensate for direct biodiversity impacts. The scoping document requires consideration of habitat fragmentation. The avoidance and mitigation measures to be used to reduce this impact need to be described in this section. Please provide further information on how the proposal meets the principle of conservation of biological diversity and ecological integrity.</p>	#125	Refer to Sections 3.3.7.1 and 3.3.7.4 of the EIS. Fauna crossings and exclusion fencing have been committed to as mitigation measures to fulfil the ESD requirements of conserving biological diversity and ecological integrity.
<p><u>Traffic and Transport</u></p>	#126	The William Hovell Drive road reserve is located adjacent to 17 residential properties in Hawker, and close to a further 31 future properties in Whitlam (separated by roads and water courses). The TIA in Appendix C to the EIS has been

Comment	Response #	Proponent Comment
<p>The statement “The relatively rural location of WHD means that the duplication would not have any significant impact on current and future urban areas.” needs further explanation due to the proximity of the suburb of Hawker and future suburb of Whitlam to the road.</p>		<p>updated to state that the corridor is near a small number of properties in those areas. However, the duplication will not have any significant negative impact on access to, or movement within, those urban areas. This section of the TIA only covers transport movement, not noise or other issues, which are covered in separate sections.</p> <p>Section 5.1.4 of the EIS has been updated to reflect this.</p>
<p>Further information or a map should be provided showing the proposed shared path and its location compared to the road, other pathways and residential blocks. The EIS states that the proposal would “include a provision for a future shared pathway to be considered alongside the road alignment, which could have a beneficial impact on the broader community as well as the ACT Government’s targeted strategies to increase active transport journeys and reduce vehicular emissions.” Please clarify whether the “future shared path” will be constructed as part of this proposal or in future and clearly demonstrate the location of the “future shared path” in relation to the proposed shared path.</p>	#127	<p>The “proposed” and “future” shared paths refer to the same path. This path was removed from the project when the original TIA was prepared (although some references to the path were missed and not removed from the TIA), but has since been included into the construction. The TIA report has been updated to include the shared path discussion.</p> <p>Refer to question #4 above for a more detailed response regarding the shared path.</p>
<p>Further justification is required to support the statement that access to surrounding areas used for recreation including the Bicentennial National Trail, Pinnacle and Kama Nature Reserves, Old Weetangera Cemetery and urban open spaces are not anticipated to be impacted during construction and operation. Paths and underpasses under the road and access to neighbouring land from the road verge may be affected during construction and by the completed road design. Please provide information on impacts to access to nature reserves, urban open space and recreational trails during construction and operation.</p>	#128	<p>Section 5.11.3 of the EIS updated to say:</p> <p><i>Access to surrounding areas utilised for recreational purposes including Bicentennial National Trail, Pinnacle and Kama Nature Reserves, the Old Weetangera Cemetery and adjacent open spaces will experience some temporary impacts to access during the construction of the Project. The construction contractor will be tasked with scheduling construction tasks so as to minimise these disruptions where reasonable and feasible to do so.</i></p> <p>This has also been added as a mitigation measure to Section 5.11.4 of the EIS, and an updated reference is made in the TIA.</p>
<p><u>Flora and Fauna</u></p> <p>A final Biodiversity Impact Assessment must be provided as the report appears to be incomplete.</p>	#130	<p>This BAR has been updated and provided as Appendix D to the EIS.</p>

Comment	Response #	Proponent Comment
<p>Impact on threatened species and ecological communities</p> <p>Non-committal language in the EIS should be replaced with more definite statements and commitments. For example, "Where possible, culverts would be designed to facilitate fauna movement" and "Consideration of wildlife crossing structures". Proposed mitigation measures should be described with certainty or removed.</p>	#131	<p>It is common practice in EIS writing throughout most Australian jurisdictions to use the conditional tense when referring to mitigation commitments. Otherwise, it sends a message to the community that certain things "will" be done, regardless of whether they obtain development approval first. Use of the conditional tense assures the reader that certain activities will only be undertaken <i>if</i> project approval is granted first.</p> <p>Nevertheless, at the request of the Conservator, use of the conditional tense has been changed to a simple future tense as this is the preference of the agency.</p>
<p>Table 5-8 of the EIS describes the direct impacts on threatened fauna species in terms of habitat loss. The EIS needs to assess the significance of the impact of the proposal on golden sun moth, pink-tailed worm lizard, swift parrot and all other threatened species included in table 5-8.</p>	#132	<p>Assessments of significance for these species under the EPBC Act are included in Appendix C of Appendix D, and are summarised in Table 5-12 of the EIS.</p>
<p>Section 5.2.3.10 of the EIS states "Assessments of significance for EPBC listed threatened entities with a higher than a moderate likelihood of occurring in the Study Area are provided in Appendix D and summarised in Table 5-12." The Biodiversity Impact Assessment (Appendix D) only assesses the significance of impacts of habitat loss for Box-Gum Woodland, Hoary Sunray and Superb Parrot despite table 5-8 showing loss of habitat for 13 threatened species, many of which are MNES. Justification should be provided for why a MNES that will lose potential habitat is considered to have less than a moderate likelihood of occurring.</p>	#133	<p>Assessments of Significance have been completed for the following species as MNES under the EPBC Act refer to Section 5.2.3.10 and Appendix D of the EIS:</p> <p>Assessments of Significance were carried out for nine of those, as listed below, which are EPBC Act listed:</p> <ul style="list-style-type: none"> • BGW (White Box-Yellow Box-Blakely's Red Gum Grassy Woodland) • Hoary Sunray • Superb Parrot • Regent Honeyeater • Grey headed flying fox • PTWL • Striped Legless Lizard • Swift parrot • White-throated Needletail • Golden Sun Moth. <p>In addition, two species listed only as Migratory under the EPBC Act were listed as having a moderate likelihood of occurrence within the study area (i.e. the Fork-tailed Swift</p>

Comment	Response #	Proponent Comment
		<p>and the Satin Flycatcher). The White-throated Needletail is listed as both Vulnerable and Migratory under the EPBC Act.</p> <p>Section 5.2.2.7 of the EIS explains how Migratory species, including the Fork-tailed Swift and the Satin Flycatcher are unlikely to be impacted by the Project. An Assessment of Significance has been prepared for the White-throated Needletail, and is provided in Appendix C of Appendix D to the EIS.</p>
<p>The EIS does not include justification for the conclusion that the impact on Pink-Tailed Worm Lizard and Swift Parrot will not be significant. There is also no assessment of the impact on Golden Sun Moth in the EIS. The Biodiversity Impact Assessment describes a low likelihood of occurrence of Golden Sun Moth. This being noted, an assessment of impacts on Golden Sun Moth in the EIS is still required. Please provide an assessment of significance consistent with the EPBC Act Significant Impact Guidelines for each MNES that may be impacted in the EIS and Appendix D to support conclusions made on the significance of impacts in Table 5-12 of the EIS.</p>	#134	<p>Assessment of Significance has been undertaken for the Swift Parrot, PTWL and GSM as MNES under the EPBC Act - refer to Section 5.2.3.10 and Appendix D of the EIS.</p> <p>PTWL has been carried forward for consideration in the Offset Management Plan which will be prepared (i.e. provision of compensatory habitat for PTWL as part of the BGW offset).</p>
<p>The direct impacts on flora and fauna must be clarified in the EIS. For example:</p> <ul style="list-style-type: none"> • Tables 5-7 (now Table 5-11) and 5-12 (now table 5-16) present inconsistent information on the impact to Hoary Sunray: table 5-7 (now table 5-11) concludes that an offset is required and 5-12 (now table 5-16) concludes that the impact will not be significant. • The inconsistency in the number of hollow bearing trees to be removed that will impact on Superb Parrot must be clarified: 7 trees in table 5-12 and 33 trees in table 5-8. • The impact on Striped Legless Lizard has also been described inconsistently. The executive summary of the Biodiversity Impact Assessment states there will be a significant impact on Striped Legless Lizard, while table 6-7 of the Biodiversity Impact Assessment states the impact is not significant. • The executive summary of Appendix D states that the project would require clearing of up to 19.85 ha of vegetation for construction, however Section 7 of Appendix D states that the amount of vegetation clearing is expected to be about 6.76 ha. 	#135	<p>The Project will be delivered in conjunction with an Offset Management Plan to manage potentially significant impacts for threatened species and ecological communities; namely Box Gum Woodland, the Hoary Sunray, Superb Parrot, Pink-tailed Worm-lizard and Striped Legless Lizard.</p> <p>EIS has been clarified to refer to seven hollow bearing trees as being impacted.</p> <p>Works associated with the Project will remove up to 19.85ha of vegetation, 6.49ha of which has been assessed as native.</p>
<p>Please revise the EIS and Appendix D to ensure consistency in the descriptions of direct impacts on flora and fauna.</p>	#136	<p>Updated Biodiversity Assessment Report and Chapter 5.2 of the EIS have been provided.</p>

Comment	Response #	Proponent Comment
Figure 3-1 and Figure 4-1 of the Biodiversity Impact Assessment are low quality and difficult to read. Please ensure all images are legible.	#137	Formatting updated.
The EIS needs to include an assessment of indirect impacts of the proposal on Box-Gum Woodland (for example, polluted stormwater run-off and spread of invasive plants).	#138	Further details regarding these indirect impacts for BGW are included in Table 5-16.
<p>Habitat fragmentation</p> <p>The EIS quantifies habitat fragmentation caused by the existing road as 25 to 30 metres, and states that this will increase to 80 metres with the proposed extension. The road alignment plan, provided with the concurrent DA, appears to show a development width of approximately 50 to 60 metres. The development width (including all works, road, shared path, drainage infrastructure) along the entire alignment, and specifically, in the most important ecological connectivity corridors, must be clarified in the EIS.</p>	#139	References to 50-60m have been updated.
The EIS states that movement of fauna and plant material across William Hovell Drive is likely to occur to the north and south east of the interface between Kama and The Pinnacle Nature Reserves and the road reserve near Weetangera Cemetery. Please provide justification for this conclusion.	#140	Text has been changed to read: "Potential movement of fauna across the current alignment of WHD increases in areas to the north and south-east of the interface between Kama and The Pinnacle nature reserves. Germinated seeds from some flora species, such as Hoary Sunray, are able to cross the road reserve at any location."
The mitigation measures to reduce habitat fragmentation are not described clearly in the EIS. Please provide further information on the wildlife crossing structures (for example, their location, features and number), fencing and road barriers. Further information on the glider poles and rope bridges proposed to be installed in areas of high ecological connectivity is required. The EIS states that two of the three underpasses will be lit which may reduce their effectiveness as wildlife crossings. Please consider the impact this will have on the ability of this mitigation measure to reduce impacts of habitat fragmentation.	#141	Additional details are provided in Sections 5.2.4 and 7 of the EIS.
The EIS does not describe in detail the residual impact of habitat fragmentation after mitigation measures have been applied. It is unclear if the impact duration and severity presented in table 5-9 is before or after mitigation measures have been applied. Information is required to support the conclusion that the likelihood of increased habitat fragmentation is possible, and the consequence is moderate (giving a risk rating of medium), considering that table 5-9 states the impact for some fauna groups will be permanent and potentially severe.	#142	Now Table 5-13. Additional information has been provided, and fauna crossings (box culverts and rope bridge) have been committed to.
Lighting and noise	#143	

Comment	Response #	Proponent Comment
<p>Please provide maps demonstrating the location of new lighting for the road duplication and provide information on how lighting will be avoided in key wildlife linkage areas. There is no discussion of the reasons for the proposed lighting and why it is preferable to alternatives of no or different lighting.</p>		
<p>Further information is required on the impact of noise and lighting on flora and fauna to support the conclusion that the likelihood of increased habitat fragmentation is possible, and the consequence is moderate giving a risk rating of medium (as for the previous point). There is no evidence provided to conclude that the increase in lighting from no lighting to lighting at 65 metre intervals, and introduction of lighting in two of three underpasses will have a medium risk of increasing habitat fragmentation.</p>	#144	
<p>There is no evidence provided for the conclusion that there are no significant noise impacts, except for a minor shift in habitat suitability for sound sensitive species. It is not clear which species are considered sound sensitive species. No mitigation measures have been provided to reduce the impact of noise and lighting on flora and fauna. Please provide further information on the significance of impacts on sound sensitive species and detail any mitigation measures that have been considered to reduce impacts on these species.</p>	#145	<p>Mitigation measures are not considered necessary for these impacts. Further detail has been provided in the EIS.</p>
<p>Roadkill</p> <p>The EIS does not provide an assessment of the level of impact vehicle strikes will have on threatened and non-threatened species, particularly on kangaroos. Further information is needed on why the effectiveness of the mitigation measures proposed (for example, fencing, culvert crossings and revegetation) is described as high. The EIS does not provide detail on the revegetation proposed to reduce vehicle strikes with birds, for example the location, type and number of plants to be planted and the effectiveness of these actions. Information is required to support the conclusion that the likelihood of loss of fauna from vehicle strikes is possible and the consequence is moderate giving a risk rating of medium. Other potential mitigation measures, such as a reduction in vehicle speed limit, have not been discussed in the EIS.</p>	#146	<p>Potential fauna strike matters are considered further in Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.</p> <p>The following has been added to Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)):</p> <p><i>A review of the road's current speed limit is outside the scope of this EIS, and current 90 km/hr limit is proposed to remain. Nevertheless, it is considered that altering the speed limit would not significantly reduce the frequency of fauna strike incidents. Research from Deakin University indicates that occurrence of fauna strike in Australia tends to peak with moderate speed limits of around 60-80km/hr (Anthony R., 2020).</i></p>

Comment	Response #	Proponent Comment
		<p>The effectiveness of the stated mitigation measures to manage these issues is now identified as moderate.</p> <p>Replanting ratios of 1:10 for native trees and 1:4 for shrubs have been committed to (refer to Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)), and Sections 5.2.4 and 7 of the EIS).</p>
<p>Adjacent nature reserves</p> <p>It is not clear what mitigation measures have been provided to reduce the impacts on adjacent nature reserves. The mitigation measures section of the hydrology chapter states that mitigation measures will be designed to ensure stormwater run-off complies with ecological limits of adjacent MNES and other environmental values. It is unclear how the proposed stormwater mitigation measures will achieve this.</p>	#147	<p>Section 5.2.3.3 has included the following statement:</p> <p><i>Protection measures for the two Nature Reserves will also include the erection of man proof fencing, treatment of drainage lines with sediment control, installation of sediment basins and a strict 'No Entry' during construction. Any other reasonable requirements from the EPA and other Government agencies will also be implemented.</i></p>
<p>The mitigation measures described do not provide information on how spread of invasive plants into adjoining nature reserves will be prevented or reduced. Information is required to support the conclusion that impacts to adjoining nature reserves is unlikely and the consequence is moderate giving a risk rating of low.</p>	#148	<p>As set out within Sections 5.2.3.3 and 5.2.4 of the EIS, it is proposed to strategically locate dense Lomandra Longifolia and shrub plantings along the boundary of the Kama NR and The Pinnacle NR (and their buffers). This will enhance habitat connectivity whilst also reducing the spread of African Lovegrass and other invasive plant species.</p> <p>Additional mitigation measures have also been added to enhance weed management of the locality as part of the Project and are set out within Sections 5.2.4 and 7 of the EIS as follows:</p> <ul style="list-style-type: none"> • Flora and Fauna Management Plan is to include Protocols to manage weeds and Pathogens • Non weedy BGW topsoil to be stockpiled for use in revegetation areas. • Weed extent in the adjoining nature reserves should be documented before construction and monitored monthly during construction. If weed presence and/or extent has increased the construction contractor is to engage a suitably qualified regeneration specialist to

Comment	Response #	Proponent Comment
		<p>undertake weed removal of these areas in line with the management plan for the reserve.</p> <ul style="list-style-type: none"> • African Lovegrass, a highly invasive exotic and serious pest plant, is currently well established right along WHD edges. Removal of this weed should be undertaken prior to and during construction. Care should be taken for this species to not spread to the adjoining land and reserves. • Prior to the commencement of works, existing weed infestations are to be treated using appropriate methods • Non weed infested areas of native dominant understorey within the road reserve should be protected and not disturbed wherever possible • All vehicles must be clean and free of visible plant propagules prior to entering and exiting the site. A vehicle brush down/washdown area will be provided • Records will be maintained demonstrating compliance. • Weedy vegetation with viable propagules (seeds, fruit, rhizomes etc) will be removed from site for safe transport and disposal at appropriate waste facility. Non-viable woody vegetation can be chipped on site • Vehicle and machinery movements will be confined to disturbed areas and existing tracks where possible. Vehicles and machinery will be cleaned (tyres brushed or washed down) prior to accessing and/or leaving areas where weeds have been identified • Use weed matting to cover any areas of exposed soil • Undertake revegetation as soon as possible post-construction • Maintain revegetated areas by undertaking weed removal until growth is enough to prevent weed invasion, as determined by a qualified ecologist

Comment	Response #	Proponent Comment
		<ul style="list-style-type: none"> • Do not stockpile vegetation containing weeds on site • Use of herbicides should be undertaken in line with the NSW Weed Control Handbook • Where reasonable possible, the contractors tasked with revegetation activities will have demonstrated capability in successfully restoring native vegetation communities • A suitably qualified ecologist will verify that revegetation activities have been undertaken to a reasonably satisfactory standard • Materials introduced into the site, such as topsoils, seeds and mulches, will be free of as much weed contamination as is reasonably possible to achieve <p>Revegetation seed used at the site will be fresh (or otherwise viable), and a sufficient sowing rate (kg/ha) will be used to ensure adequate coverage.</p>
<p>Provide information on the impact to registered tree PTR081 and mitigation measures proposed as it appears to be close to the area of works.</p>	#149	<p>The design has been updated so that works in this vicinity only impact the existing pavement area. As additional earthworks will not be undertaken, the roots of this registered tree PTR081 will not be significantly impacted.</p> <p>Additional text has been added to Section 5.2.2.3 of the EIS.</p>
<p>Mitigation arrangement and offsetting</p> <p>Mitigation measures for all impacted threatened species and MNES should be provided. For example, the Biodiversity Impact Assessment states Superb Parrots were recorded in the study and there is a moderate likelihood of occurrence of the Striped Legless Lizard and Swift Parrot in the study area. An explanation should be provided if mitigation measures are not required. The EIS should include a discussion on whether a land bridge or other structures such as culverts are feasible to reduce fragmentation between Kama and The Pinnacle Nature Reserves.</p>	#150	<p>Refer to Section 2.4.1 of the EIS.</p> <p>Provision of a fauna bridge at this location is planned for consideration under a Future Feasibility Study. Further investigations must be undertaken to demonstrate the additional benefit of this structure in the context of additional land clearing being required to support it.</p> <p>Relevant assessment and mitigation measures for MNES have been updated in Section 5.2.3.10 and Appendix D of the EIS. The Offsets Management Plan will include habitat for BGW, Pink-tailed Worm-Lizard, Striped Legless Lizard and Superb Parrot.</p>

Comment	Response #	Proponent Comment
<p>The EIS states an offset is required for impact on Box-Gum Woodland, however it is not clear whether offsets are required for impacts on other MNES. The outcome of an assessment of significance for each MNES as described above will assist in determining if offsets are required for other MNES.</p>	#151	<p>The Offsets Management Plan will include habitat for BGW, Pink-tailed Worm-Lizard, Striped Legless Lizard and Superb Parrot.</p>
<p>The EIS does not provide information on whether the proposed biodiversity offset west of Kama Nature Reserve complies with the Commonwealth or ACT biodiversity offset policy. The Biodiversity Impact Assessment describes the ACT biodiversity offset policy and does not refer to the Commonwealth policy. The assessment states that an offset strategy will be developed in future once potential offset sites have been identified and an offset management plan will then be developed. The EIS must provide details on the proposed offset, (for example its size, condition, management arrangement), management actions and whether it complies with the Commonwealth offset policy.</p>	#152	<p>It has been agreed with the Conservator that the Draft Offset Strategy for the Project is to follow the Commonwealth's EPBC Offset Calculator, whilst applying the ACT Environmental Offsets Delivery Framework.</p> <p>Further details on the proposed offset are provided in Section 5.2.4 of the EIS.</p>
<p>Monitoring</p> <p>The monitoring of roadkill and wildlife use of crossing structures that will occur post construction needs to be detailed. The monitoring and maintenance of revegetation works and weed control post construction also needs to be detailed.</p>	#153	<p>Potential fauna strike matters are considered further in Section 5.2.3.2 (Fauna injury or mortality (vehicle collision)) and Table 5-13 in 5.2.3.3 of the EIS. Relevant mitigation measures regarding fauna strike are provided in Sections 5.2.4 and 7 of the EIS.</p> <p>The following monitoring measures are now committed to in sections 5.2.4 and 7 of the EIS:</p> <ul style="list-style-type: none"> • Weed extent in the adjoining nature reserves should be documented before construction and monitored monthly during construction. If weed presence and/or extent has increased the construction contractor is to engage a suitably qualified regeneration specialist to undertake weed removal of these areas in line with the management plan for the reserve • Road kill should be monitored monthly during construction by a suitably qualified person and for two years during operation to determine if mitigation measure have been effective. Adaptive management (e.g. moving barriers and wildlife fencing) should be adopted based on the results of the monitoring. A report on road kill should be written to determine if there are hotspots on the new road and include

Comment	Response #	Proponent Comment
		<p>recommendations for reducing roadkill in these hotspots. Adaptive management should be used to undertake recommendations of the report</p> <ul style="list-style-type: none"> Any connectivity structures will be monitored by remote sensor cameras for a period of three years after construction Newly created road verges will be monitored, and adaptive management undertaken to limit mowing/encourage recruiting Hoary Sunray specimens within the site Exclusion fencing (1.8 m tall chainmesh fence with floppy top feature) to be included on each side of WHD in the vicinity of the Nature Reserves, extending at least 200m past the fauna crossings. The effectiveness of this exclusion fencing will be monitored during the operational stage of the Project.
<p><u>Heritage</u></p> <p>The EIS states that the indirect impact to the Weetangera Cemetery will not increase as the risk of vandalism and visitation will not increase and screening vegetation can be planted to obscure any views to the cemetery. Further information on the screening vegetation to be planted is required and an assessment conducted of its effectiveness.</p> <p>The ACT Heritage Council has commented that the civil plans submitted with the DA show potential impacts to multiple heritage sites as they are inconsistent with the heritage impacts described in the EIS and Cultural Heritage Assessment (Appendix E).</p> <p>The comments from the ACT Heritage Council regarding inconsistencies between the EIS, Cultural Heritage Assessment and the civil plans submitted with the DA must be addressed. Non-committal language should be replaced with definite statements and commitments.</p>	#154	Refer to responses #38-44 above.
<p><u>Noise, Vibration and Lighting</u></p> <p>A final Noise and Vibration Assessment must be provided as the report is currently in draft form.</p>	#155	Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.
<p>The EIS and Noise and Vibration Assessment (Appendix F) identified 33 sensitive receivers in Hawker and identified the Whitlam estate as well. The Assessment models the noise in Whitlam Estate produced by the road, however it is not clear which location in Whitlam. Please determine</p>	#156	Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.

Comment	Response #	Proponent Comment
<p>the number of individual blocks that are likely to be sensitive receivers in Whitlam and model the noise at each block in Whitlam as has been done for the Hawker blocks.</p>		
<p>The EIS must demonstrate that the Noise and Vibration Assessment was conducted in accordance with the Roads ACT Noise Management Guidelines.</p>	#157	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>
<p>Noise monitoring locations were provided in figure 5-10 of the EIS. The EIS needs to provide information on whether the location of noise loggers is appropriate for determining noise impacts to sensitive receivers. Please explain whether the monitoring locations are in accordance with the monitoring methodology recommended in the ACT Noise Management Guidelines. The estimate of current noise at sensitive receivers is based on modelling, not monitoring of current conditions. A further assessment must be undertaken, including noise monitoring from the block boundary of the sensitive receivers.</p>	#158	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>
<p>Section 4.3 of the Noise and Vibration Assessment and Section 5.5.2.2 of the EIS states there was a reduction in traffic levels during the monitoring period due to COVID-19 and that measured noise levels during this period cannot be used to establish project target noise levels. Please provide further information on how the project target noise levels were determined and are sufficient for the sensitive receivers in accordance with the Roads ACT Noise Management Guidelines.</p>	#159	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>
<p>The EIS and the Noise and Vibration Assessment state that the noise model was verified as the predicted noise at the noise monitoring loggers was within 2 decibel (dB) of the measured noise level, therefore the model can be used to predict noise at sensitive receivers. Please provide further modelling for sensitive receivers based on monitoring of current noise levels averaged from multiple times of the day (e.g. peak times).</p>	#160	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>
<p>The EIS outlines the impacts of noise and states that "isolated construction activities may result in minor vibration impacts which are either barely perceptible or not perceptible for nearby receivers." Please provide further justification of the statement regarding the vibration and noise impacts to sensitive receivers during construction of the proposal.</p>	#161	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>
<p>The EIS and Noise and Vibration Assessment include inconsistent information on the proposed mitigation measures. The EIS states noise from operation of the road will exceed guidelines at 3 of 34 sensitive receivers. The Assessment states there are three potential mitigation measures for reducing noise, and each option results in noise within the guideline at the three affected receivers. It is not clear which option is recommended by the noise assessment and what is proposed for the development. For example, the mitigation measures table (table 5-25) states "Investigate operational noise management measures such as: Noise barriers/ mounds, Low noise</p>	#162	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>

Comment	Response #	Proponent Comment
<p>road pavement surface, Building envelope treatments". Page 124 of the EIS states "noise would be sufficiently mitigated by using two noise walls for the portions of the Project that are in close proximity to sensitive receivers. ... Noise barriers have been recommended as part of this proposal", however the Noise and Vibration Assessment states that open graded asphalt is the preferred noise mitigation approach. The EIS needs to clearly describe the mitigation measures that are proposed and the residual impact of noise on sensitive receivers.</p>		
<p>The mitigation measures proposed have not been clearly described. The EIS states that the model prediction of road noise incorporates road design, structures such as noise barriers and the road surface. The EIS must describe the mitigation measures that were used in the model to predict noise. The details of the noise wall, road surface treatment and any other mitigations must be provided.</p>	#163	<p>Refer to updated Noise and Vibration Assessment as Appendix F and Section 5.5 of the EIS.</p>
<p>Further information is required to justify the statement that "it is accepted that a difference of up to 2dB(A) is not noticeable to the human ear."</p>	#164	<p>NSW Government recognises that a 2dB change (increase or decrease) will not be noticeable – refer 'Environmental criteria for road traffic noise' section B4 page 27 (NSW EPA May 1999) and NSW EPA 'NSW Road Noise Policy' (March 2011) section 3.4 'Applying the noise assessment criteria' page 21</p>
<p>The EIS does not describe the impact of lighting on sensitive receivers from construction and operation of the proposal. Please describe these impacts as required by the scoping document.</p>	#165	<p>Refer to Section 5.8.2.4 of the EIS.</p>
<p>Soil and Geology Please provide further information on the impact of erosion and sediment on water quality and ecology and provide further details on the controls that will be implemented during construction to avoid impacts on water quality.</p>	#166	<p>Further details provided.</p>
<p>Hydrology The EIS does not provide results from MUSIC modelling or information to demonstrate that the proposed water quality control measures will achieve the claimed pollution reduction. Please provide further information on the effectiveness of vegetated swales for treating stormwater runoff (and contaminants including hydrocarbons and suspended solids) from the proposed duplication prior to discharge to Deep Creek and its tributaries. The EIS describes that the water quality control measures are "very close" to meeting the targets in Molonglo 3 – Stormwater Management WSUD Design Strategy (GHD, July 2015). The EIS needs to provide an explanation for why these targets apply, rather than the higher targets in the Water Sensitive Urban Design</p>	#167	<p>The updated hydrology report includes assessment of the proposed water treatment methods using the Model for Urban Stormwater Improvement Conceptualisation (MUSIC) Version 6 software.</p> <p>The design was reviewed and updated from PSP to improve water quality outputs of the project by isolating road pavement runoff from clean water runoff from external catchments where possible and treating pavement runoff in grass channels. The grass channels help to remove pollutant particles as the runoff passes through the grassed area, the</p>

Comment	Response #	Proponent Comment
<p>(WSUD) General Code or update the WSUD approach to ensure it meets the WSUD code requirements.</p>		<p>contaminants are removed via filtration and infiltration. The grass channel approach will also continue the current characteristics of WHD and provide ease of maintenance.</p> <p>The water quality reduction target for the detailed design, considering new pavement area only, is compliant with the WSUD General Code R7 requirements.</p>
<p>The EIS must provide additional information on the impacts of large rainfall events on the stormwater drainage system as the proposal will increase the area of impervious land and increase runoff. Section 5.7.6 of the EIS states that there will be a minor increase in peak stormwater runoff due to the project. Please provide quantification of this minor increase to support this statement. The EIS states the proposal would “maintain or increase” the stormwater drainage to manage surface water for rainfall events up to the one percent annual exceedance probability event (1% AEP). Please define whether the current drainage infrastructure is sufficient for flow attenuation up to 1% AEP or specify what upgrades will be implemented to ensure adequate drainage is provided to reduce the impacts of flooding, particularly during major storm events. The stormwater management for the proposal and its capacity to withstand high rainfall events needs to be clarified. The impact of increased runoff on downstream waterways including erosion risk needs to be considered. More information is required to conclude that the residual risk of changes to water flow regimes is very low reduced from an initial high risk.</p>	#168	<p>The existing transverse drainage infrastructure has been retained where practically possible to ensure consistency in the flow regime between existing and post-developed conditions. As such, there will only be minor change in flow attenuation between the present day and post construction. Due to the proposed works of the shared path and road widening, some the existing head available for the transverse drainage culverts will be reduced which will affect capacity for events larger than the 1% AEP.</p>
<p>Landscape and Visual The EIS must include a map showing where each photo viewpoint was taken and the direction of the view. Viewpoints must be provided from all visual sensitive receivers. The visual impact of the development viewed from multiple parts of Whitlam (including the impact of the 9-metre retaining wall), looking south from the intersection of William Hovell Drive and Drake Brockman Drive and south of the same intersection looking east and west has not been addressed. The visual impacts of the proposed acoustic walls close to Hawker and Whitlam do not appear to have been considered. The visual effect of removing trees and vegetation also needs to be described.</p>	#169	<p>Further details provided in Section 5.8 of the EIS.</p>
<p>The visual impact of the proposal on sensitive receivers in Hawker and Whitlam needs to be further addressed. Justification needs to be provided for the conclusion that the impact will be low or moderate at all locations and the residual risk of visual impacts to sensitive receivers is low.</p>	#170	<p>Further details provided in Section 5.8 of the EIS.</p>
<p><u>Matters of National Environmental Significance (MNES)</u> The EIS describes the area of habitat lost for 14 threatened species and threatened ecological communities but only presents the significance of impact for 8 MNES. The Biodiversity</p>	#171	<p>A likelihood of occurrence assessment was undertaken using desktop methods and supported by a field assessment. This identified 14 threatened species and one ecological community as having a moderate or higher</p>

Comment	Response #	Proponent Comment
<p>Assessment only contains a formal assessment of significance for 3 MNES. It is not clear which of the threatened species in table 5-8 are MNES. The EIS must describe the impact on Box Gum Woodland, Superb Parrot, Swift Parrot, Golden Sun Moth and any other MNES potentially impacted by the project. As written above in the flora and fauna section, an assessment of significance must be conducted for each potentially impacted MNES to provide a justification for whether the impact is significant.</p>		<p>likelihood of occurring in the study area, as follows (refer to Sections 5.2.2.5, 5.2.2.6 and 5.2.2.7 of the EIS):</p> <p>Assessments of Significance have been completed for the following species as MNES under the EPBC Act refer to Section 5.2.3.10 and Appendix D of the EIS:</p> <p>Assessments of Significance were carried out for nine of those, as listed below, which are EPBC Act listed:</p> <ul style="list-style-type: none"> • BGW (White Box-Yellow Box-Blakely's Red Gum Grassy Woodland) • Hoary Sunray • Superb Parrot • Regent Honeyeater • Grey headed flying fox • PTWL • Striped Legless Lizard • Swift parrot • White-throated Needletail • Golden Sun Moth. <p>In addition, two species listed only as Migratory under the EPBC Act were listed as having a moderate likelihood of occurrence within the study area (i.e. the Fork-tailed Swift and the Satin Flycatcher). The White-throated Needletail is listed as both Vulnerable and Migratory under the EPBC Act.</p> <p>Section 5.2.2.7 of the EIS explains how Migratory species, including the Fork-tailed Swift and the Satin Flycatcher are unlikely to be impacted by the Project. An Assessment of Significance has been prepared for the White-throated Needletail, and is provided in Appendix C of Appendix D to the EIS.</p>
<p>The EIS does not include a discussion of known threats to each potentially impacted MNES. The EIS only includes a description of the area of habitat lost. Please provide a discussion of the other threats caused by the proposal.</p>	#172	<p>Assessments of Significance were carried out for eight threatened species and one ecological community listed under the EPBC Act and considered to have a moderate or higher likelihood of being present in the study area.</p>

Comment	Response #	Proponent Comment
		Table 5-12 summarises the Assessments of Significance undertaken for each of these species. Appendix C of Appendix D to the EIS sets out these Assessments of Significance in detail.
Direct impacts to potentially impacted MNES have been assessed. However, there is no assessment of indirect impacts to any MNES. The EIS contains a general assessment of the indirect impact of fragmentation, vehicle strike, edge effects, invasive species, noise, light and vibration but it is not specific to each MNES. The duration and intensity of impact due to fragmentation is described for faunal groups. Please provide a description of the indirect impacts on potentially impacted MNES.	#173	This has been updated in Section 5.2.3.10.
A detailed assessment must be provided of the nature and extent of the likely long term relevant impacts.	#174	Further detail provided.
A statement must also be provided on whether any relevant impacts are likely to be unknown, unpredictable or irreversible.	#175	Refer to Section 5.2.5 of the EIS.
The EIS must outline how the proposal is consistent with Australia's obligations under the Convention on Biological Diversity, the Convention on Conservation of Nature in the South Pacific (Apia Convention), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and ACT recovery plans and threat abatement plans. The EIS must outline how the proposal is consistent with relevant Commonwealth recovery plans or threat abatement plans for all impacted MNES. The Biodiversity Assessment provides an assessment of whether the proposal is consistent with Commonwealth recovery plans for the 3 MNES that have an assessment of significance. This is required for all potentially impacted MNES. The EIS does not outline how the proposal is consistent with any Commonwealth threat abatement plans.	#176	Section 5.2.4 of EIS sets out how the Project is consistent with these requirements for which Assessments of Significance were prepared. Additional references to threat abatements plans and the like have been provided in the Assessment of Significance summaries.
If offsets are proposed to compensate for impacts on MNES, the EIS must describe the proposed offsets and how they comply with the EPBC Act environmental offsets policy.	#177	
<p><u>Community & Stakeholder Consultation</u></p> <p>There is no evidence provided that consultation has been done with potentially impacted lease holders (including sensitive receivers), the local community and community groups. Consultation with potentially impacted lease holders, land managers, local community and community groups must be undertaken.</p>	#178	A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.

Comment	Response #	Proponent Comment
<p>Consultation must be undertaken with recreational groups which may be affected by the proposal and conservation groups active in the area. Please note the ACT Equestrian Association, Friends of the Pinnacle, Friends of Grasslands and Ginninderra Catchment Group have provided detailed submissions on the proposal.</p>	#179	<p>Update report noting subsequent community consultation; update report to identify (any) general community consultation undertaken or available</p>
<p>Consultation must be undertaken with recreational groups which may be affected by the proposal and conservation groups active in the area. Please note the ACT Equestrian Association, Friends of the Pinnacle, Friends of Grasslands and Ginninderra Catchment Group have provided detailed submissions on the proposal.</p>	#180	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p>
<p>Please provide a consultation report that includes a description of the methodology and criteria for identifying stakeholders, communication methods used, a copy of the information provided during the consultation process, summary of the responses and main comments raised and a description of how concerns have been considered and addressed. Evidence must be provided demonstrating that consultation has been undertaken with each relevant group or person, especially any identified sensitive receiver and adjacent local residents. Provide details of how each concern raised during community consultation has been addressed or incorporated into the design.</p>	#181	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p>
<p>Consultation must be undertaken with recreational groups which may be affected by the proposal and conservation groups active in the area. Please note the ACT Equestrian Association, Friends of the Pinnacle, Friends of Grasslands and Ginninderra Catchment Group have provided detailed submissions on the proposal.</p>	#182	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p>
<p>Please provide a consultation report that includes a description of the methodology and criteria for identifying stakeholders, communication methods used, a copy of the information provided during the consultation process, summary of the responses and main comments raised and a description of how concerns have been considered and addressed. Evidence must be provided demonstrating that consultation has been undertaken with each relevant group or person, especially any identified sensitive receiver and adjacent local residents. Provide details of how each concern raised during community consultation has been addressed or incorporated into the design.</p>	#183	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p>
<p>Recommendations</p> <p>Please describe whether the proposal will conduct monitoring and reporting and if so, provide details on the monitoring parameters, monitoring points, frequency, data interpretation and reporting proposals.</p>	#184	<p>Sections 3.3.7.2 and 7 of the EIS identify how the following monitoring measures have been committed to as part of the Project, in addition to the Project being delivered under an Environment Protection Agreement between TCCS or its construction contractor:</p>

Comment	Response #	Proponent Comment
		<ul style="list-style-type: none"> • The effectiveness of this exclusion fencing will be monitored during the operational stage of the Project • Revegetation activities at the site will be subject to monitoring to ensure the occurrence of feral animal species is not significantly hampering revegetation efforts • Monitoring of newly created road verges as created by the Project and adaptive management to limit mowing or encourage recruiting specimens could have the potential to align with Recovery Plan for Hoary Sunray if implemented • Weed extent in the adjoining nature reserves should be documented before construction and monitored monthly during construction. If weed presence and/or extent has increased the construction contractor is to engage a suitably qualified regeneration specialist to undertake weed removal of these areas in line with the management plan for the reserve • Road kill should be monitored monthly during construction by a suitably qualified person and for two years during operation to determine if mitigation measure have been effective. Adaptive management (e.g. moving barriers and wildlife fencing) should be adopted based on the results of the monitoring. A report on road kill should be written to determine if there are hotspots on the new road and include recommendations for reducing roadkill in these hotspots. Adaptive management should be used to undertake recommendations of the report • Any connectivity structures will be monitored by remote sensor cameras for a period of three years after construction

Comment	Response #	Proponent Comment
		<ul style="list-style-type: none"> Newly created road verges will be monitored, and adaptive management undertaken to limit mowing/encourage recruiting Hoary Sunray specimens within the site.
<p>Required Appendices</p> <p>Please provide information on the proponent's environmental history. This must include details of any proceedings under a Commonwealth or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the proponent of this proposal. If the person proposing to take the action is a corporation, then provide details of the corporation's environmental policy and planning framework. If the proponent is a corporation, provide the history of its executive officers in relation to environmental matters.</p>	#185	As a custodian of transport services land within the ACT, TCCS has a quality history of environmental performance within the ACT.
<p>For information sources provided, how the reliability of the information was tested and what uncertainties (if any) are in the information must be described.</p>	#186	Refer to Sections 5.1.4, 5.2.3, 5.3.3, 5.4.3,5.5.3, 5.6.3, 5.7.3, 5.8.3, 5.9.3, 5.10.3, 5.11.3 and 5.12.2 of the EIS.
<p>Appendix H in the EIS describes the study team. The qualifications and experience of the study team, specialist sub-consultants and expert reviewers must be provided.</p>	#187	This has been updated.
<p>Report writing errors in the EIS must be corrected. For example, Figure 5-2 is not showing a grassy woodland as is described in the figure caption.</p>	#188	This figure has been removed from the EIS.
<p>Requirements for a bilateral EIS</p> <p>The EIS must be prepared in accordance with section 50 of the Planning and Development Regulation 2008. Subsection 1 states that an EIS being assessed in accordance with a bilateral agreement under the Environment Protection and Biodiversity Conservation Act 1999 must address the matters mentioned in the Environment Protection and Biodiversity Conservation Regulations 2000, schedule 4.</p>	#189	Refer to Sections 3.1.2 and 3.1.3 of the EIS.
<p>The following items must be addressed in the revised EIS.</p> <ul style="list-style-type: none"> How the action relates to any other actions (of which the proponent should reasonably be aware) that have been, or are being, taken or that have been approved in the region affected by the action. 	#190	Refer to Section 5.2.3.9 of the EIS.

Comment	Response #	Proponent Comment
<ul style="list-style-type: none"> Any consultation about the action, including proposed consultation about relevant impacts of the action and identification of affected parties, including a statement mentioning any communities that may be affected and describing their views. 	#191	A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.
<ul style="list-style-type: none"> Information in the EIS section on the impacts of the action must include a statement whether any relevant impacts are likely to be unknown, unpredictable or irreversible. 	#192	Refer to Section 5.2.5 of the EIS.
<ul style="list-style-type: none"> Information in the EIS section on proposed safeguards and mitigation measures to deal with relevant impacts of the action must include <ul style="list-style-type: none"> a description, and an assessment of the expected or predicted effectiveness of, the mitigation measures; Further information is required as the draft EIS describes the predicted effectiveness as only either high or low. any statutory or policy basis for the mitigation measures; the cost of the mitigation measures; an outline of an environmental management plan that sets out the framework for continuing management, mitigation and monitoring programs for the relevant impacts of the action, including any provisions for independent environmental auditing; the name of the agency responsible for endorsing or approving each mitigation measure or monitoring program. 	#193	<p>Refer to Sections 3, 3.1.3, 5.1.5, 5.2.4, 5.3.4, 5.4.4, 5.5.4, 5.6.4, 5.7.7, 5.8.4, 5.9.4, 5.10.4, 5.11.4, 5.12.3, 7, 5.1.6, 5.2.5, 5.3.5, 5.4.5, 5.5.5, 5.6.5, 5.7.8, 5.8.5, 5.9.5, 5.10.5, 5.11.5, 5.12.4, 3.3.7.2</p> <p>TCCS, as a public authority, has budgeted for the cost of undertaking suitable mitigation measures with respect to this Project (refer to Section 3.3.7.5 of the EIS).</p>
<ul style="list-style-type: none"> Information in the EIS section on other requirements for approval or conditions that apply, or that the proponent reasonably believes are likely to apply, to the proposed action must include <ul style="list-style-type: none"> details of any local government planning scheme, or plan or policy under any local government planning system that deals with the proposed action, including how the scheme provides for the prevention, minimisation and management of any relevant impacts; a description of the monitoring, enforcement and review procedures that apply, or are proposed to apply, to the action. 	#194	Refer to Section 3, 3.3.7.2 and 7 of the EIS.
<ul style="list-style-type: none"> Details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the person proposing to take the action. If the person proposing to take the action is a corporation, details of the corporation's environmental policy and planning framework must be provided. 	#195	NA.
<ul style="list-style-type: none"> For information given in an environmental impact statement, the draft must state how the reliability of the information was tested and what uncertainties (if any) are in the information. 	#196	Refer to Sections 5.1.4, 5.2.3, 5.3.3, 5.4.3, 5.5.3, 5.6.3, 5.7.3, 5.8.3, 5.9.3, 5.10.3, 5.11.3 and 5.12.2.

Comment	Response #	Proponent Comment
<p>Consultation must be undertaken with recreational groups which may be affected by the proposal and conservation groups active in the area. Please note the ACT Equestrian Association, Friends of the Pinnacle, Friends of Grasslands and Ginninderra Catchment Group have provided detailed submissions on the proposal.</p>	#197	<p>A Stakeholder Engagement Report has been drafted which details the community consultation processes that have since been undertaken for the project.</p> <p>Notifications of the Your Say page for the consultation undertaken in November-December 2021 were sent to a range of community recreational and general groups including Ginninderra Catchment Group, Friends of Grasslands, Friends of Pinnacle Nature Reserve, Friends of Mount Painter, Friends of ACT Trees; Birdscaping CBR.</p>