



## NSW National Parks and Wildlife Service

Your ref: CSSI - 70610456  
Our ref: DOC26/146960

Energy and Resource Assessments  
NSW Department of Planning, Housing and Infrastructure  
12 Darcy Street  
PARRAMATTA NSW 2150

By email: kurtis.wathen@dpie.nsw.gov.au

### Hunter Transmission Project – Response to Submissions

Thank you for the referral of the State Significant Infrastructure (SSI) 70610456 Hunter Transmission Project via the NSW Major Projects Portal. The NSW National Parks and Wildlife Service (NPWS) appreciates the opportunity to provide further comment on the project as it directly affects land administered under the *NSW National Parks and Wildlife Act 1974* (NPW Act) and a declared flora reserve under the *NSW Forestry Act 2012*, for which NPWS is the declared land manager.

Our focus remains on the impacts to Jilliby State Conservation Area, Watagans National Park, Corrabare North Flora Reserve and Lot 165 DP755219, as an offset pending reservation under the NPW Act. NPWS advises that Lot 165 DP755219 is currently subject to a perpetual Crown Lease 1937/1 held by the NSW Minister for the Environment, but the underlying tenure is State Forest. This land is designated as an offset linked to the Huntlee New Town Development MP10\_0137 under a Voluntary Planning Agreement (VPA). Once concurrence is finally received from the NSW Minister administering the *NSW Forestry Act 2012*, the land will be reserved under Part 4 of the NPW Act.

The matters raised in **Attachment 1** of this letter are based on the agency's review in the context of the NPWS response dated 25 September 2025 (as DOC25/797488).

In summary, only one matter remains outstanding as per Part A of Attachment 1. All other residual matters have been sufficiently addressed as part of the Submissions or Addendum Report package, or can be addressed as either by a direct condition or via the environmental management documentation required for construction. NPWS conditional requests are set out in Part B of Attachment 1.

For further information, contact me on 02 4784 7322 or via [david.crust@dcceew.nsw.gov.au](mailto:david.crust@dcceew.nsw.gov.au).

Yours sincerely

David Crust  
**Director, Blue Mountains Branch**  
**NSW National Parks and Wildlife Service**

17 March 2026

Enclosure: Attachment 1: NPWS response on the Hunter Transmission Line Project

## Attachment 1 - NPWS response on the Hunter Transmission Line Project

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On review of the *Submissions Report Hunter Transmission Project*, prepared by Energy Corporation of NSW, dated February 2026, the *Amendment Report Hunter Transmission Project*, as prepared by Energy Corporation of NSW, dated February 2026, and relevant amended technical reports, NPWS raises the following matters:

### Part A – Matters still outstanding or unresolved

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1. Clarify the statutory application of the NPW Act, as a critical legislative obligation linked to the authorisations issued under that Act. How this is undertaken is set out in the *NPWS response dated 25 September 2025 (DOC25/797488)*, Attachment 1- Section 1.
2. Clarify if the works proposed to the existing Eraring to Kemps Creek 500 kV line (Line 5A1 and 5A2) directly form part of the current HTL project EIS. If the telecommunications installation, receiving tower reinforcement, and new line stringing form part of the project, confirmation of adequate environmental assessment is required.

### Part B - Planning approval condition requests

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#### Compliance and authorisation

3. Authorisation under section 151 of the *NSW National Parks and Wildlife Act 1979* must be obtained before access and construction works can commence on the NPWS estate.
4. Before the operation of the HTL on the NPWS estate, the easement held by Transgrid for the existing Eraring to Kemps Creek 500 kV line (Line 5A1 and 5A2) is to be varied to facilitate the connection, widening and permanent access use on Jilliby SCA.
5. Activities on NPWS estate must remain consistent with the statutory plans, *Corrabare Flora Reserves (Corrabare North (No.203 and Corrabare South No.204) Site Specific Working Plan (NPWS-FCNSW 2023)* under the *NSW Forestry Act 2012* and the *Watagans National Park and Jilliby State Conservation Area Plan of Management NPWS 2010*) under the *NSW National Parks and Wildlife Act 1974*.
6. Activities on NPWS estate which do not form part of the EIS or the Planning Approval as issued under Division 5.2 of the *NSW Environmental Planning and Assessment Act 1979* will be subject to additional environmental assessment consistent with NPWS policy and procedures.
7. Activities on the NPWS estate are restricted to the approved construction activity areas as specified under the EIS or approved CEMP (inclusive of subplans). All other areas on the NPWS estate are to be identified as ecologically or culturally sensitive areas, with established 'no clearing zones'.

#### Road and trail upgrade works on the NPWS estate

8. NPWS road or trail upgrade works involving the designated fire trail network depicted by the Central Coast or Lower Hunter Fire Access and Fire Trail Plans must accord with *NSW Fire Trail Standards (RFS, 2023)*. Designated trails must be upgraded to their designated category.
9. NPWS trail upgrade works for non-designated trail networks are to be constructed to a suitable standard consistent with the NPWS Roads Manual for unsealed roads in consultation with NPWS.
10. Integration and retention of the Wishing Well site's natural spring as a functional water supply, including future access arrangements as part of the upgrades to Martinsville Road.
11. All spatial data, the catalogue of works, and any relevant certification attached to the NPWS estate road and trail network are to be provided to NPWS on completion of the works. All deficiencies or damage to the network are to be rectified before project completion.

## Post approval environmental documentation

12. NPWS is identified as a key agency in the preparation of the **Construction Environmental Management Plan (CEMP)**, and any subplans where works affect the NPWS estate. The CEMP is to provide adequate measures for the delivery, monitoring and trigger response planning, with assigned escalating mitigation for dust, noise, vibration, erosion and visitor safety.
13. NPWS is identified as a key agency in the preparation of the **Aboriginal Cultural Heritage Management Plan (ACHMP)**. The plan, as it applies to the NPWS estate, is to include:
  - a. criteria for micro-siting all HTL works to conserve and protect cultural values on the NPWS estate as a priority.
  - b. hierarchical procedures in the protection and conservation of Aboriginal cultural values that set in-situ protection through avoidance, minimising impact using movement or relocation before or during works, subject to protocols and apply where necessary, both short and long-term management.
  - c. suitable and respectful unexpected finds protocols addressing risks raised by the representatives for the Darkinjung people to manage potential harm to ancestral burial sites on Jilliby SCA.
  - d. procedures for safekeeping places as determined by the RAPs, inclusive of pre-identification, preparation, security or environmental risks associated with receiving sites and their authorisation on the NPWS estate. Adherence to the NPWS policy and procedures is required.
  - e. movement, relocation, or repatriation procedures for the respectful management of displaced or excavated Aboriginal objects. This includes the recording of the storage, movement, relocation and care arrangements for Aboriginal objects held by an Aboriginal person or organisation.
  - f. conservation protocols for the removal or relocation of culturally modified trees, with methods and long-term management.
  - g. management outcomes of the water source access at the wishing well site as completed in consultation with Traditional Owners, NPWS, FCNSW and Heritage NSW.
  - h. ensure all Aboriginal objects retained in situ, moved, or relocated are recorded on AHIMS via an AHIMS site card update or site card impact form with attached data and reports, is complete before transmission line operation.
14. NPWS is identified as a key agency in the preparation of the **Historic Heritage Management Plan (HHMP)**. The plan, as it applies to the NPWS estate, is to include:
  - a. archaeological excavation procedures attached to the Wishing Well, inclusive of archival recording and removal methodology, temporary item storage arrangements, relocation and reinstatement of fabric methods in consultation with NPWS, FCNSW and Heritage NSW.
  - b. unexpected finds protocol, for archaeological relics associated with heritage sites, in accordance with Heritage NSW guidelines.
  - c. establishment of culturally sensitive areas and no-go zones for all retained heritage sites on the NPWS estate proximate to the proposed works.
  - d. interpretive package for the Wishing Well, content and implementation on the NPWS estate.
  - e. removal of the Wishing Well from the s.170 of the Heritage Act 1977 Agency Register in consultation with Heritage NSW.
15. NPWS is identified as a key agency in the preparation of the **Bush Fire Emergency Management and Evacuation Plan (BFEM&EP)**. The plan, as it applies to the NPWS estate, is to include:
  - a. documented compliance with the *NSW Rural Fires Act 1997*, with respect to designated fire trail upgrade on the NPWS estate, ensuring works accord with the Central Coast or Lower Hunter Fire Access and Fire Trail Plans and the *NSW Fire Trail Standards* (RFS, 2023).
  - b. effective coordination protocol on matters relating to fire trail access, emergency response and bushfire risk management where the HTL project interacts with the NPWS estate.
  - c. emergency evacuation route with confirmed alignments, trail condition, upgrade requirements and operational parameters for use as an emergency route on the NPWS estate.

16. NPWS is identified as a key agency in the **preparation of any aerial operations planning** (HTL project use of drones or helicopters), ensuring any planning, as it applies to the NPWS estate, includes:
  - a. recognition of helicopter landing sites (HLS) on NPWS estate, and their use in emergency and aerial park management operations. Set out operational restrictions arising from the HTL project construction.
  - b. protocol for the establishment of emergency helipads anywhere on NPWS estate during NPWS emergency operations, establishing direct notification or communication pathways between NPWS, FCNSW and TransGrid as the selected provider.
  - c. adherence to NPWS policy and procedures during aerial operations on NPWS estate, via <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-policies/drones-in-parks>
  - d. provision of the HTL final tower design, location and data set as a georeferenced spatial file, with recorded coordinates of towers, crane operational areas, meteorological masts, and wire installation actions before construction commences. Ensure a notification process is in place for any modification.
  - e. notification protocols on HTL project flight plans and operations on NPWS estate to ensure helicopter and drone operations (including wire installation) are communicated where they occur on, or within 8km of the NPWS estate boundary.
17. NPWS is identified as a key agency in the preparation of the **Biodiversity Management Plan (BMP)**. The plan, as it applies to the NPWS estate, is to include:
  - a. restrictions on native vegetation clearance extent, habitat disturbance or resource loss on the NPWS estate, identifying ecologically sensitive areas and applying 'no-go areas' to protect the natural values.
  - b. micro-siting of construction activity areas to avoid excessive impacts in areas of high biodiversity value.
  - c. identification of the NPWS estate as a sensitive ecological receiver where predicted noise levels over 40 dBA, or where dust, or vibration will indirectly affect biodiversity values, ensuring monitoring, trigger response and reporting. This is to include dust deposition effects on the frog ponds in Jilliby SCA.
  - d. translocation plan to support the relocation of key cultural resources and gathering values where it relates to plant species attached to the ACHMP, using the NSW Translocation policy and procedure as guidance via <https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/programs-legislation-and-framework/translocation>.
18. NPWS is identified as a key agency in the preparation and implementation of the **Strategic Offset Delivery Agreement (SODA)**. Ensuring the SODA considers the direct loss of natural values attached to the state's conservation reservation system, with offset justification considering the NSW Government commitments under the NSW Koala Strategy 2018, in the loss of koala habitat for Corrabare North FR.