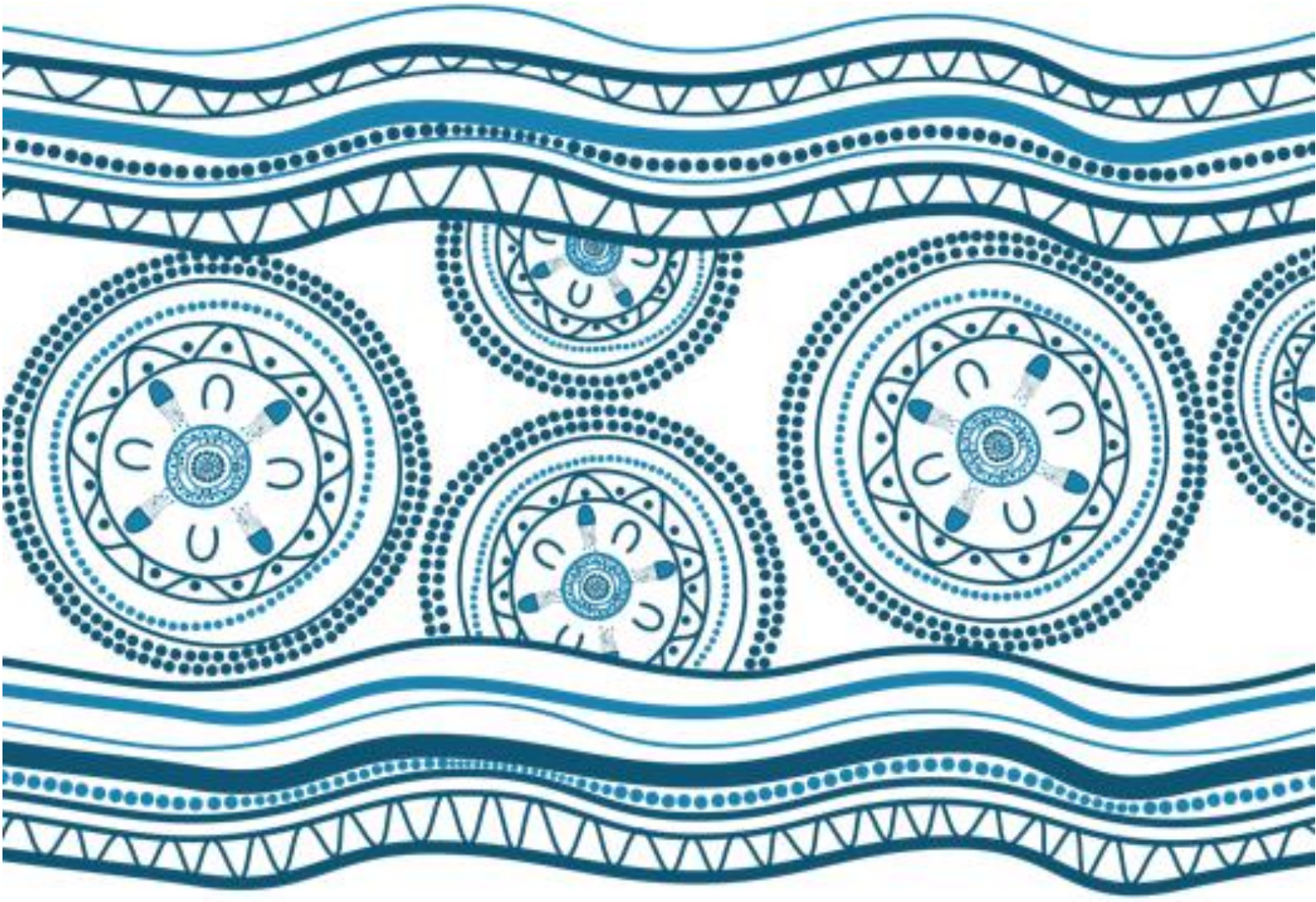
Chapter 27

Project justification and conclusion



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27 Project justification and conclusion

This chapter presents a justification of the project and a conclusion to the EIS. The justification considers how the project balances strategic and project needs against the protection of the environment and planning outcomes outlined in the objects of the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act). This includes ecologically sustainable development (ESD) and community consultation outcomes.

27.1 Justification

27.1.1 Project justification

Transport for NSW is seeking approval to construct and operate the ferry wharves at La Perouse and Kurnell in Botany Bay. The previous wharves at La Perouse and Kurnell were damaged in a storm in 1974. This limits the potential of both areas and people's ability to easily access the historically and culturally significant areas and restricts the use of the Kamay Botany Bay National Park (the National Park). This was identified as a problem within the Kamay Botany Bay National Park Kurnell Master Plan (NSW Department of Planning, Industry and Environment (DPIE), 2019).

The project would see the reinstatement of multi-user wharves at La Perouse and Kurnell, as well as additional car parking (at La Perouse), landscaped areas and installation of utilities to service the wharves. Once the wharves are constructed and ferry service between La Perouse and Kurnell is operational the improved maritime accessibility is expected to increase the number of people visiting the National Park. It would also improve the cultural and heritage connectivity between the two peninsulas, therefore helping transform the National Park into an iconic destination.

A waterborne transport connection between La Perouse and Kurnell would create new commercial and recreational opportunities for a range of people and user groups. It would help improve accessibility and inclusivity by providing an affordable way for people to travel between the two areas of the National Park and would enhance the arrival experience to the National Park.

A ferry service would help improve walking and cycling along the coastline. It would increase the opportunity for recreational walkers to experience the natural amenity of the coast on both sides of Botany Bay, while cyclists could effectively create an extended loop by connecting two very popular routes.

The proposed new transport link would increase people's likelihood to visit both headlands of the National Park. It is also anticipated that a portion of visitors who previously travelled to the National Park by private vehicle may be inclined to switch modes to active modes and public transport due to the proposed ferry service.

Having a direct connection from La Perouse to Kurnell would allow for improved engagement and recognition of Aboriginal culture at both sites of the National Park. Aboriginal cultural heritage can encompass physical evidence of Aboriginal use of an area as well as culturally or spiritually significant places. The reconnection between the sites would allow greater connection to Country and assist those participating in cultural activities at Kurnell.

The wharves would serve as a physical reminder of the connection between the two sites and help commemorate that connection for the local Aboriginal community.

Recreational boat users would be able to berth at the wharves, as well as recreational fishing from the wharves.

New economic opportunities may be created for La Perouse and Kurnell through the reinstatement of the wharves. This includes potential commercial ferry operators and the subsequent associated jobs created by the project that allows people to engage and participate in the workforce. The

surrounding areas of La Perouse and Kurnell may indirectly benefit from job opportunities and economic growth because of the increased number of people in the area due to the ferry service.

27.1.2 Project objectives

The project objectives are listed in Chapter 4 (Strategic justification and project need). A summary of how the project achieves the objectives if provided in Table 27-1.

Table 27-1: Assessment of project objectives

Objective	Assessment of the project against the objective
Create waterborne access to the National Park for passenger ferries, tourism-related commercial vessels, and recreational vessels.	The project would achieve this by providing two multi-user wharves that would reinstate an inclusive affordable means to travel between the two areas of the National Park, and provide a dedicated berth for tourism-relating commercial vessels and recreational vessels.
Ensure safety is paramount during all project lifecycle phases.	A systematic process was (and will continue to be) followed at all stages of design development and operation to ensure the wharves are designed and operate in accordance with Australian and International safety standards. This includes an independent qualified person carrying out a review of the project's safety.
Adopt a place-led approach to the services in accordance with the Movement and Place Framework (Transport for NSW, 2020k).	The project seeks to achieve a collaborative, spatial, and long-term approach to delivering wharves which better meet the needs of future wharf users including customers and the local community, and the local environment, considering the social, environmental, and economic context. As outlined in Chapter 5 (Project description), the project is aligned with Better Placed (NSW Government Architect, 2017), an integrated design policy for the built environment which aligns with the Movement and Place Framework.
Achieve value for money and efficiency in the development, delivery, and operation of the project.	The project is implementing thorough design development, risk management and value optimisation processes to ensure an efficient use of resources to achieve the project objectives. The project would achieve value for money as the wharves are designed to cater for customer and community requirements identified through stakeholder consultation and market soundings.
Ensure the project is completed within the project budget.	The project scope definition and design development has been progressed and tested through cost estimation to meet the project funding allowance for the project. The design excludes non-essential components that would not deliver value for money without compromising the necessary customer and community requirements for the project.
Complete the project as early as possible.	Feasible and reasonable steps have been taken to reduce the project timeframes. This has included robust program management to optimise the delivery. It also includes building both landside and marine elements and both wharves at the same time. Effective communication and management have been carried out to avoid unforeseen delays, such as early consultation with Department of Planning, Industry and Environment (DPIE) and key agency stakeholders to eliminate surprises throughout the planning approval process.
Ensure full compliance with all planning approvals.	Transport for NSW is committed to environmental performance and management. This is embedded into its charter. It is core to

Objective	Assessment of the project against the objective
	its policies and responsibilities as one of the key NSW Government agencies. Transport for NSW has set up a very clear set of guidance documents, performance specifications and quality assurance processes to manage environmental performance to comply with, and ideally exceed, statutory requirements. An environmental assessment process has been carried out, as reported in this EIS, to ensure the project's impacts are identified, assessed, and managed 'to the fullest extent possible' to avoid and minimise any adverse environmental outcomes. This is a core to the object of the EP&A Act (refer to Table 27-2 below). Consultation has been carried out over the project's life to identify, manage, and mitigate issues, and the EIS has been reviewed by a certified environmental impact assessment practitioner. DPIE and Department of Agriculture, Water and Environment will review these factors in deciding whether to approve the project under State and Commonwealth legislation. Both agencies will also set their own conditions of approval to supplement the EIS mitigation measures. These will become legally binding and Transport for NSW will need to comply with these requirements. Any contractors and sub-consultants will be contractually held to account to ensure they also comply with planning requirements. They will need to implement management and monitoring plans while keeping track of their performance of over the life of their involvement on the project. Separately, Transport for NSW will monitor and audit the contractor performance. Finally, DPIE will approve an independent environmental representative to oversee the construction work to ensure compliance. This will be underpinned by a corrective action, complaints management, and continuous improvement process. Collectively, these measures provide a standard, proven and effective way to fully comply with all planning approvals.
Make the best use of available resources from private and public sectors.	Collaboration between public and private sectors has been integral throughout all stages of the project development including ongoing stakeholder engagement and market soundings with various public and private sectors. The integrated project team consists of public and private consultants which capitalises on specialist technical expertise and experience from both sectors.
Ensure robust, accountable, and transparent governance systems and structures are implemented.	Comprehensive governance arrangements are in place for the project. Transport for NSW is engaged by National Parks and Wildlife Service to manage the development and delivery of the project. The project is therefore accountable to several Governance Committees at various stages of the project lifecycle. A Project Working Group is active as a cross-agency decision-making body for the project. The Kamay 2020 Project Board ultimately oversees the implementation of the project which includes senior representatives from Commonwealth, State, and Local Governments, and the Chairperson of the La Perouse Local Aboriginal Land Council.
Ensure meaningful engagement with the Aboriginal community and that	The project has involved continued engagement with the Aboriginal community as described in Chapter 6 (Consultation).

Objective	Assessment of the project against the objective
culturally sensitive outcomes are implemented.	The design has responded to Aboriginal community responses to ensure culturally sensitive outcomes are implemented. An example of this includes the consultation and design of the La Perouse landscaping area which impacts Timbery Reserve. In consultation with the Aboriginal community, the design responded to issues raised and proposes to incorporate the existing plaque, include specific planting selection and improve seating. Aboriginal Cultural Interpretation Services are currently being procured to facilitate the meaningful integration of 'artwork' into the built fabric of the wharves. This strategy will be developed and integrated into the design.
Meet the needs and expectation of end users, community, and key stakeholders.	The wharves have been designed to meet the customer and community requirements based on thorough consultation and engagement with the community and stakeholders throughout the project development and design process. This includes designing the wharves to be compliant with the *Disability Discrimination Act 1992* (Cth), multi-user friendly, and sympathetic to the historical and cultural importance of Kamay Botany Bay.
Ensure the project promotes ecologically sustainable development principles.	ESD principles are considered in section 27.1.5.

27.1.3 Objects of the EP&A Act

The objects (purpose) of the EP&A Act provide a framework for which the justification of the project can be considered. A summary of this assessment is provided in Table 27-2.

Table 27-2: Objects of the EP&A Act

EP&A Act object	Comment
To promote the social and economic welfare of the community and a better environment by the proper management, development, and conservation of the State's natural and other resources.	The project would promote social and economic welfare by reinstating a ferry service between La Perouse and Kurnell, improving accessibility, enhancing visitor experiences, and providing for increased economic opportunities.
To facilitate ecologically sustainable development by integrating relevant economic, environmental, and social considerations in decision-making about environmental planning and assessment.	ESD principles are considered in section 27.1.5.
To promote the orderly and economic use and development of land.	The project would reinstate wharves in the same location as they were prior to 1974. This is an orderly and economic use of land within the National Park and reduces impacts by avoiding previously undisturbed ground.
To promote the delivery and maintenance of affordable housing.	The project neither includes nor impacts on affordable housing.
To protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities, and their habitats.	The project is designed to avoid and minimise impacts on biodiversity where possible. Where terrestrial and marine biodiversity impacts are unavoidable, mitigation measures would reduce impacts on species and habitats. Biodiversity offsets would be implemented for the project's marine impacts where impacts cannot be avoided.
To promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage).	The project has been designed to avoid and minimise impacts on Aboriginal and non-Aboriginal heritage both on land and underwater. Management measures would ensure potential impacts are avoided and minimised during construction. The

EP&A Act object	Comment
	wharves would increase accessibility to the culturally significance sites within the National Park, and support in preserving the heritage and cultural education legacy for current and future generations.
To promote good design and amenity of the built environment.	Design principles were established through feedback from community consultation and aligns with Beyond the Pavement (Transport for NSW, 2020a), Better Placed (NSW Government Architect, 2017) and Connecting with Country (NSW Government Architect, 2020) policy objectives. The wharves are designed to avoid impacts on amenity and integrate with the surrounding environment, with a 'light touch' principle being adopted.
To promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants.	The constructability of the wharves has been considered throughout design development to ensure the wharves can be constructed safely and with the least environmental impacts. Maintenance of the wharves would ensure the ongoing safety for future users.
To promote the sharing of the responsibility for environmental planning and assessment between the different levels of Government in the State.	Consultation has been undertaken with Local, State and National Government agencies throughout the development of the project and the preparation of the EIS. All levels of Government have been encouraged to be actively involved in, and to contribute to, the development of the project and this EIS through historical and continuing consultation activities.
To provide increased opportunity for community participation in environmental planning and assessment.	Community consultation and engagement has been ongoing throughout the project development. The plan for ongoing consultation is detailed in Chapter 6 (Consultation).

27.1.4 Objects and principles of the *National Parks and Wildlife Act 1974*

As the project is located within Kamay Botany Bay National Park the objects and reserve management principles of the *National Parks and Wildlife Act 1974* (NSW) must be considered.

Table 27-3: Objects and principles of the *National Parks and Wildlife Act 1974*

Objects	Comment
2A Objects of Act	
(a) The conservation of nature, including, but not limited to, the conservation of: (i) habitat, ecosystems, and ecosystem processes (ii) biological diversity at the community, species, and genetic levels (iii) landforms of significance, including geological features and processes (iv) landscapes and natural features of significance including wilderness and wild rivers	There would be some unavoidable biodiversity impacts on the ecological values of the National Park in reinstating the wharves (refer to Chapter 11 (Terrestrial biodiversity)). However, the impacts have been minimised through an effective design and supplemented by various mitigation measures (refer to Appendix A (Project synthesis and summary of environmental management measures)). Importantly, there is predicted to be no significant residual impact on any ecological values within the National Park (refer to Chapter 26 (Environmental risk analysis)). The proposed mitigation is also assessed as being effective in minimising impacts to levels considered acceptable under NSW and Commonwealth guidelines. The project would have no impact on National Park's geological features, values, or processes. While there would be localised shoreline impacts (refer to Chapter 18 (Coastal processes)) the associated modelling predicts that there would be no material change to the area's coastline or coastal processes. The project would reinstate the wharves within the setting of the National Park. While this would change the area's natural

Objects	Comment
	landscape setting, the reintroduction would help shape the area's cultural setting. The scale of the wharves within Botany Bay would not materially impact on, or distract from, the core landscape values of the National Park. Also, the project's landside components have been designed to be of a scale, nature and type that would reinforce the built infrastructure that already exists in the National Park. This is reinforced by the selective use of building materials, treatments and finishes that replicate what is used in the National Park. The project also has no impact on wilderness areas or wild rivers as defined under the NSW *National Parks and Wildlife Act 1974.*
(b) The conservation of objects, places, or features (including biological diversity) of cultural value within the landscape, including, but not limited to: (i) places, objects, and features of significance to Aboriginal people, and (ii) places of social value to the people of NSW (iii) places of historic, architectural, or scientific significance	The project would be built in an area of important cultural significance and value. A process of Aboriginal community consultation and participation has helped shape the project as described in Chapter 6 (Consultation). This has been with the aim of improving access to the National Park and helping create a Connection to Country between the headlands. This will improve access to the area allowing people to better appreciate the cultural and social value and history of Kamay from an Aboriginal and non-Aboriginal perspective. Choosing to build the wharves in their previous location would limit their material impact on Aboriginal objects and features. However, in order to build the wharves, there would be some impact to the area's heritage values (refer to Chapter 7 (Aboriginal heritage) and Chapter 8 (Non-Aboriginal heritage)). These impacts are being managed and minimised in accordance with NSW Guidelines, at the heart of which is engagement and consultation with registered Aboriginal parties to ensure the project's overall design has focussed on conserving the heritage record and minimising any unavoidable impacts. At the same time the project has also included measures to improve the connection between places of Aboriginal cultural, historical, and social significance. Finally, the project would have no impact on any architectural or scientifically significant values in the National Park.
(c) Fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation	As noted above, the project would help more people gain a better understanding of the area's Aboriginal and non-Aboriginal cultural heritage by: • Improving movement and connection across Botany Bay • Including heritage interpretation within the project's design to reflect the area's cultural heritage • Improving access to the Kurnell Visitor Centre.
(d) Providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.	Addressed in 30E National Park reserve management principles below.
30E National Park reserve management principles	
(1) The purpose of reserving land as a National Park is to identify, protect, and conserve areas containing outstanding or representative ecosystems, natural or cultural features or landscapes or phenomena that provide opportunities for public appreciation and inspiration and	As noted above, the project's design has been developed to either avoid or minimise impacts on the National Park's ecosystems, natural, and cultural features. While this is the case, there are certain impacts that cannot be avoided if the project is built. These impacts can be mitigated using a series of effective measures that are proven and tested.

Objects	Comment
sustainable visitor or tourist use and enjoyment so as to enable those areas to be managed in accordance with subsection (2).	In building the project it offers the benefit of increasing access to the National Park for more people. This is especially true of the southern side of the National Park, which is currently harder to reach, especially for those people living closer to Sydney. This means more people would be able to appreciate the National Park in a sustainable way.
(2) A National Park is to be managed in accordance with the following principles: (a) the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena and the maintenance of natural landscapes (b) the conservation of places, objects, features, and landscapes of cultural value (c) the protection of the ecological integrity of one or more ecosystems for present and future generations (d) the promotion of public appreciation and understanding of the National Park's natural and cultural values, (e) provision for sustainable visitor or tourist use and enjoyment that is compatible with the conservation of the National Park's natural and cultural values (f) provision for the sustainable use (including adaptive reuse) of any buildings or structures or modified natural areas having regard to the conservation of the National Park's natural and cultural values (g) provision for the carrying out of development in any part of a special area (within the meaning of the NSW *Hunter Water Act 1991*) in the National Park that is permitted under section 185A having regard to the conservation of the National Park's natural and cultural values (h) provision for appropriate research and monitoring.	The project has considered the management principles throughout its history. This is founded in the project being part of the Kamay Botany Bay National Park Kurnell Master Plan (NSW DPIE, 2019), and recognition in being key to helping improve the use of, access to, and enjoyment of Kamay. As the project developed, its ability to help support cultural learning became a key focus. This resulted in a design that was developed in collaboration with, and with input from, the Aboriginal community. Once the EIS progressed, a key focus was to ensure that its impacts could be managed effectively without compromising the values and features of the National Park. While there will be various temporary and permanent impacts, the EIS has concluded that these could be effectively mitigated, and that any residual impacts would be acceptable in the context of the benefits the project delivers for current and future generations. The project is part of Stage 1 of the Kamay Botany Bay National Park Kurnell Master Plan (NSW DPIE, 2019). Therefore, it is inherently consistent with the National Park's management principles.

27.1.5 Ecologically sustainable development

Ecologically sustainable development (ESD) is development that improves the total quality of life, both now and in the future, in a way that maintains the ecological processes on which life depends. The principles of ESD have been an integral consideration throughout the development of the project.

ESD requires the effective integration of economic and environmental considerations in decision-making processes. The four main principles supporting the achievement of ESD are discussed below.

Precautionary principle

The precautionary principle deals with reconciling scientific uncertainty about environmental impacts with certainty in decision-making. It provides that where there is a threat of serious or

irreversible environmental damage, the absence of full scientific certainty should not be used as a reason to postpone measures to prevent environmental degradation.

This principle was considered during options development (refer to Chapter 4 (Project development and alternatives)). The precautionary principle has guided the assessment of environmental impacts for this EIS and the development of mitigation measures.

Significant environmental impacts on biodiversity and heritage have been avoided or minimised throughout the development of the project. The project seeks to construct the wharves in the same location as the previous wharves prior to 1974. This location was selected to avoid large areas of sensitive seagrass and existing heritage artefacts and features. Further impacts to biodiversity have been minimised as far as possible through refinement of the wharves' footprint and minimising seabed and land disturbance. A biodiversity offset strategy would be implemented to offset any unavoidable impacts.

The precautionary principle has continued to guide the assessment of environmental impacts for this EIS and the development of mitigation measures. The EIS was prepared using a conservative approach, which included assessing the worst-case impacts and scenarios. It has been carried out using the best available technical information and has adopted best practice environmental standards and measures to minimise environmental risks.

Inter-generational equity

Social equity is concerned with the distribution of economic, social, and environmental costs and benefits. Inter-generational equity introduces a time element with a focus on minimising the distribution of costs to future generations.

The project has been designed with future customer and community requirements in mind, taking into consideration how people will use and enjoy the wharves for future generations to come. The wharves are designed to be multi-user wharves with the ability to berth various vessel sizes, allowing flexibility for future use by ferry operators, private users, and other commercial vessel users.

If the project was not carried out, there would be continued disconnect between the La Perouse and Kurnell parts of the National Park. The wharves and ferry service would improve accessibility and connectivity for current and future generations.

The project would provide increased accessibility to culturally significant places for both Aboriginal and non-Aboriginal history. This would benefit current and future generations ability to share and understand important events of Australian history.

While some short-term negative impacts are identified, management measures to mitigate any adverse impacts have been considered and included in Appendix A (Project synthesis and summary of environmental management measures). The implementation of these measures would ensure the principles of inter-generational equity is met.

Conservation of biological diversity and ecological integrity

Conservation of biological diversity and ecological integrity has been a fundamental consideration of design development. As described in Chapter 4 (Project development and alternatives), initial location options were considered based on biodiversity constraints and to avoid impacts on sensitive ecological communities. The land-based elements of the project have been refined to avoid vegetation clearing. The marine elements such as the position, length, and number of piles of wharves has been refined to avoid impacts on seagrass and other sensitive habitats where possible. The construction boundaries of the project have been refined to reduce and avoid impacts on sensitive communities.

A terrestrial and marine biodiversity assessment was carried out to identify potential adverse impacts on biodiversity (refer to Chapter 10 (Marine biodiversity), Appendix H (Marine Biodiversity

Assessment Report), Chapter 11 (Terrestrial biodiversity) and Appendix I (Biodiversity Development Assessment Report)). These assessments identify potential impacts on biodiversity and provide a range of mitigation measures to further avoid and minimise potential impacts. Where impacts would be unavoidable, a range of management and mitigation measures have been identified. These measures include construction exclusion zones and no-anchoring zones, measures to limit sediment disturbance, vessel movements, vessel strike and monitoring. A biodiversity offset strategy will be implemented to offset the impacts.

Improved valuation and pricing of environmental resources

The principle of internalising environmental costs into decision making requires consideration of all environmental resources which may be affected by the carrying out of a project, including air, water, land and living things.

This ESD principle was developed in response to a series of valuation and pricing mechanisms to help define environmental values and costs. Each is briefly discussed below in Table 27-4.

Table 27-4: Improved valuation and pricing of environmental resources

Valuation and pricing principles	Comment
Best available technologies	
Where there is the need to use feasible controls to avoid or minimise impacts that are both reasonably available and economically viable locally.	Appendix A (Project synthesis and summary of environmental management measures) describes the range of measures that the project would commit to during construction and operation to avoid and minimise impacts. Most of these are widely used because they are proven at being effective in mitigating impacts. They are supported by additional management plans and monitoring requirements to ensure they remain effective throughout the project's life. This means the measures are reasonably available and proven in being economically viable in NSW at managing environmental performance.
Lifecycle cost principles	
Where total up and downstream environmental, ecological, and social impacts are accounted for.	The EIS reports the predicted direct and indirect impacts from building and operating the project. This includes the impacts from transporting, using, and recovering/disposing of materials/waste. A key element for the project is promoting low embodied carbon materials that are durable to reduce the project's lifecycle impact; especially when considering total maintenance costs. Another element of the project is developing a long-term legacy that helps improve cultural awareness, education, and connection to the National Park that is socially inclusive. The project has therefore considered its lifecycle impacts and benefits.
Polluter pays principle	
Where there is the need to remain liable for any pollution and environmental damage over a project's life.	The mitigation measures in Appendix A (Project synthesis and summary of environmental management measures) describe the provisions to avoid and minimise pollution when building and operating the project. As described above, these measures are routinely introduced to manage impacts as they are proven to be effective. They would be controlled and monitored under a CEMP and through Transport for NSW's operating systems. This means the potential for causing actual harm or damage over the project's life would be managed to an acceptably low level. Regardless, the appointed contractor and operator would be responsible for any pollution or environmental damage in line with its obligations under the *Protection of the Environment Operations Act 1997* (NSW).
Best practical environmental option	
Where there is the need to provide the most benefit for the least environmental, social, and cultural impact at an acceptable cost in both the short and long-term.	Chapter 4 (Project development and alternatives) describes the alternatives that were considered in developing the project. Options for a bridge, tunnel, upgrading existing wharves and provision of additional transport services were discounted for being prohibitively expensive, having greater adverse impacts and not meeting the project objectives. The preferred option was considered the best solution to providing a connection between La Perouse and Kurnell, whilst avoiding impacts to the environment and achieving the project objectives.

Valuation and pricing principles	Comment
	While there would be project-related impacts, these can either be avoided or mitigated to acceptable levels. Where there is still some uncertainty about impacts, the proposal to manage and audit the environmental performance onsite means that the overall outcome provides the best-balanced practical option environmentally. It does this by providing a solution to deliver long-term social and cultural benefits while effectively mitigating and offsetting the project's impacts for current and future generations.
Environmental goals	
Where measures are established and implemented to maximise benefits and minimise associated environmental, economic, cultural and/or societal costs.	As described in Table 27-1 above, a key project objective is to deliver value for money reflecting this being a public project that is Government funded. This means the benefit of reinstating the ferry service must outweigh the project's impacts. This was tested in the project's business case, which demonstrated that the wider social and cultural benefits identified in Chapter 3 (Strategic justification and project need) are of value against the ability to mitigate and offset the impacts. More specifically, the Kamay Botany Bay National Park Kurnell Master Plan (NSW DPIE, 2019) establishes the aims and objectives to realise the maximum cultural and social benefits in the area; factors that have carried through into the project's objectives. Equally, the project's mitigation measures establish the means to minimise environmental, economic, cultural, and social impacts.

27.2 Conclusion

This environmental assessment has addressed the key issues identified in the SEARs issued under Division 5.2 of the EP&A Act and the relevant provisions of Schedule 2 of the NSW Environmental Planning and Assessment Regulation 2000 (refer to Appendix C (Environmental Planning and Assessment Regulation 2000 checklist)). The Commonwealth requirements have also been addressed. A checklist showing where the SEARs and Commonwealth requirements are addressed in this environmental assessment is provided in Appendix B (Secretary's environmental assessment requirements and Commonwealth assessment requirements).

The potential impacts have been avoided or minimised in developing the project. As described in Table 27-1 and Table 27-2 above, the project meets its objectives and the objects (purpose) of the EP&A Act and the NPW Act. However, there would still be some temporary and permanent impacts.

Management measures detailed in this EIS would mitigate or minimise predicted impacts. Any residual impacts are considered acceptable on balance with the benefits of the project, and as such the project is considered appropriate and justified.