



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

Att: kurtis.wathen@dpie.nsw.gov.au

Hunter Transmission Project

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 comments as the project directly affects land reserved and acquired 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.

NPWS acknowledges that the project is declared Critical State Significant Infrastructure (CSSI) under Division 5.2 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act).

On review of the *Hunter Transmission Project Environmental Impact Statement prepared by Energy Corporation of NSW, dated August 2025* (EIS) and supporting technical reports, NPWS raises the matters, as set below, with a detailed explanation and figures provided in **Attachments 1 and 2**.

NPWS, in reviewing the EIS, has considered our input to the Secretary's Environmental Assessment Requirements – Attachment B (SEARs ref DOC24/379096-12) as issued on 14 June 2024. Our focus is on the project-based impacts to Jiliby State Conservation Area, Watagans National Park, Corrabare North Flora Reserve and a perpetual lease vested in the Minister for the Environment covering Lot 165 DP755219 Crumps Road, which is also part of Corrabare State Forest. These areas are collectively referred to as 'NPWS estate' in this advice.

NPWS raises these matters as they relate to the application of the NPW Act and Forestry Act, clarity around the project, and acknowledgement of residual impacts and the mitigation measures to be implemented for the NPWS estate. Our focus remains entirely on the protection of the natural, cultural and social values for which the land is reserved, acquired and declared under the NPW Act and Forestry Act.

Where the project affects the NPWS estate, NPWS recommends further information:

1. providing clarity on the statutory considerations of the project under the NPW Act and Forestry Act (Flora Reserves), which are important to the authorisations for the proposal subsequent to it receiving planning approval
2. finalising the project description as it affects the NPWS estate, with confirmation of the full extent of the project's construction and access requirements
3. recognising the project's implications on the full scope of aerial operations on or near the NPWS estate, including park operations and drone use, given aircraft safety requirements

4. delivering the statutory provisions for bushfire management, which are beyond Planning for Bushfire Protection but relate to the management of bushfire risk subject to the *NSW Rural Fires Act 1997*
5. considering the adequacy and condition of the emergency access routes across the NPWS estate, confirming whether those routes are fit for purpose, and ensuring that the impacts of any necessary improvements are considered as part of the EIS
6. acknowledging Aboriginal cultural heritage values are protected as part of the reservation or acquisition of the land under the NPW Act, and appropriately managing impacts in accordance with NPWS policy and conservation procedures in partnership with the Aboriginal community
7. managing the loss of historic and shared heritage values as a result of the project, ensuring there is appropriate acknowledgement of local significance, and retention of partial values and function where applicable by applying adequate mitigation measures
8. recognising the role of both the NPW Act and Forestry Act in the protection and conservation of biodiversity values on lands reserved/acquired or declared under those Acts, and addressing loss of values through offsets that will result in no net loss of biodiversity values on the NPWS estate
9. ensuring sustained environmental quality in the NPWS estate with protection of visitor amenity, and water and air quality by reducing impacts to values.

While we have concerns about the level of information provided in the EIS, NPWS wishes to assure you that we are fully supportive of the project. The above information, particularly those matters listed in points 1 and 2 above – i.e. clarification of the project's description relative to the proposed access, ancillary upgrades and adjustment works on NPWS estate – is essential to ensure the project can be appropriately authorised under the relevant legislation following its planning approval.

NPWS contacts regarding the project and the consultation under the EIS.

- NPWS Manager, Wollemi-Yengo Area, responsible for Corrabare North Flora Reserve and Lot 165 DP755219 can be contacted at npws.wollemiyengo@environment.nsw.gov.au or on 02 65745555.
- NPWS Manager, Central Coast Area, responsible for Jilliby State Conservation Area and Watagans National Park, can be contacted at npws.centralcoast@environment.nsw.gov.au or on 02 49729000.

If you have any further questions, please contact David Crust, the NPWS Director Blue Mountains Branch, assigned primary contact for the project on 02 47847300 or at npws.bluemountainsbranch@environment.nsw.gov.au.

Yours sincerely



Mark Peacock
**A/Executive Director, Park Operations Inland
NSW National Parks and Wildlife Service**

25 September 2025

Enclosure: Attachment 1 – NPWS detailed response
Attachment 2 – NPWS Response - Figures

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NPWS Response – Environmental Impact Statement

NPWS retains a vested interest in the conservation and protection of land reserved and acquired under the NSW *National Parks and Wildlife Act 1974* (NPW Act) and in the land for which NPWS is the declared land manager under the NSW *Forestry Act 2012* (Forestry Act).

In providing this advice, NPWS has considered its role:

- as the park authority for lands reserved under Part 4 of the NPW Act, as Jilliby State Conservation Area (Jilliby SCA) and Watagans National Park (Watagans NP),
- as the park authority for lands acquired under Part 11 of the NPW Act and vested in the NSW Minister for the Environment, as the Ministerial Roads through Watagans NP and the perpetual lease for Lot 165 DP755219, and
- as the appointed land manager for the Corrabare North Flora Reserve (Corrabare North FR) as declared under s.16 of the NSW *Forestry Act 2012* (Forestry Act).

These lands are collectively referred to as ‘NPWS estate’ in this advice.

In providing this advice, NPWS has reviewed the *Hunter Transmission Project Environmental Impact Statement as prepared by Energy Corporation of NSW, dated August 2025* (EIS). NPWS has also considered consistency with the Secretary’s Environmental Assessment Requirements (SEARs), including those elements recommended by the NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) dated 14 June 2024 – available at <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-70610456%2120240819T055450.027%20GMT>.

1. Statutory considerations for the NPWS estate

On review of Part 5 (Statutory Context) of the EIS, NPWS notes that permissibility is not completely described, subject to the NSW *Environmental Planning and Assessment Act 1979*, including its subordinate environmental planning instruments, nor addressed in consistency with the NPW Act or the Forestry Act.

NPWS recommends

As part of the EIS addendum report

1. Consider the statutory context of the NPW Act and Forestry Act, according to the SEARs (as per **Items 16 to 18**), when addressing the requirements critical to enabling project authorisation under the respective Acts.
2. Revise the referencing to the NPWS estate (as environmentally sensitive areas of state significance), explaining the context of land administration, and separating the flora reserve’s description from the areas of state forest administered by the Forestry Corporation of NSW to ensure transparency around project-related impact descriptions. NPWS estate is:
 - a. land reserved under Part 4 of the NPW Act as Jilliby SCA and Watagans NP, as owned by the NSW Minister for the Environment and administered under the NPW Act
 - b. land acquired by, or vested in, the NSW Minister for the Environment, and administered under Part 11 of the NPW Act as Ministerial Roads
 - c. land (Lot 165 DP755219) managed under a perpetual lease which is vested in the Minister for the Environment and managed in accordance with Part 11 of the NPW Act but which also remains part of Corrabare State Forest (refer to **Item 10** below)
 - d. land declared as Corrabare North FR for a conservation purpose under s.16 of the Forestry Act, for which NPWS has been appointed the land manager, as set out in **Item 6** below.

3. Clarify statutory pathways for authorisation of the proposal under the NPW Act and Forestry Act. Currently, permissibility is not adequately described, consistent with the requirements of s.2.44(1) of TISEPP, in that, for land reserved under the NPW Act, this can only apply if:
 - a. *is authorised by or under that Act*. The EIS has not adequately considered the provisions of the NPW Act to justify that the project is or can be authorised under that Act, and/or
 - b. *is subject to an existing interest under s.39 of the NPW Act*, which may be in part be applicable to the existing Eraring – Kemps Creek 500 kV line on Jilliby SCA but does not apply to new connective or ancillary works, nor to the construction access proposed on the NPWS estate, and/or
 - c. *is carried out within an existing easement that has been granted and is not contrary to the terms of that easement*, which applies to the existing Eraring – Kemps Creek 500 kV line but does not apply to new connective, extension or ancillary works, nor to the construction access on the NPWS estate, and/or
 - d. *is an electricity work to which s.53 of the Electricity Supply Act 1995 applies*, which may apply but has not been adequately explained as part of the permissibility discussion in the EIS.
4. Clarify how a decision to approve the proposal on lands reserved or acquired under the NPW Act would be consistent with the requirements of s.2A(3) of the NPW Act. This section of the Act, which applies to any function under the NPW Act, requires the Minister for the Environment, the DCCEEW Secretary and NPWS to give effect to the following:
 - a. *the public interest in the protection of the values for which land is reserved under this Act* as Jilliby SCA and Watagans NP, and
 - b. *the appropriate management of those lands*, consistent with the management principles for each reservation type (refer to s.30E and s.30G of the Act) and the *Watagans National Park and Jilliby State Conservation Area Plan of Management* (NPWS-DECCW 2010), as the adopted statutory plan under the NPW Act (available at www.environment.nsw.gov.au/publications/watagans-national-park-and-jilliby-state-conservation-area-plan-management), which prevails as per s.81(4) of the NPW Act.
5. Clarify consistency with the Forestry Act, as it relates to Corrabare North FR as state forest declared to be a flora reserve for the preservation of native flora, and with the *Corrabare Flora Reserves (Corrabare North (No.203 and Corrabare South No.204) Site Specific Working Plan* (NPWS-FCNSW 2023) as the approved working plan for the flora reserve (available at www.forestrycorporation.com.au/_data/assets/pdf_file/0009/1497195/frwp-corrabare.pdf).
6. Confirm how the project, including the connection to the new line, remains consistent with the terms of the existing easement held by Transgrid for the Eraring – Kemps Creek (5A1 and 5A2) 500 kV line, or is subject to any extension or variation (temporary or permanent) to this easement. If any permanent modification to the easement is proposed, consider the project under the provisions of s.153 of the NPW Act.
7. Clarify that the authorisation pathway will be under s.151 (as a licence) of the NPW Act for areas reserved under that Act. The licence will enable construction access, permit temporary occupation and exclusive use of land during construction, and allow the proponent to construct, install and modify assets on the NPWS estate. In applying a licence, justification must be provided in accordance with Item 4. Refer to s.151 and s.151A of the NPW Act for clarification.
8. Clarify the authorisation pathway under the Forestry Act to enable those parts of the proposal in Corrabare North FR (including access, occupation, construction and operation of the new transmission line). As stated in the EIS, this initial authorisation was to be subject to a lease under s.33 of the Forestry Act (as it accords with s.62 and s.63 of that Act). Confirm this as the authorisation pathway under the Forestry Act, and document any related requirements under that Act.

9. Confirm how the final easement under [s.34](#) of the Forestry Act will be established post-project construction to authorise the lawful operation of the new transmission line on Corrabare North FR. Confirm the easement process, and the status of its negotiation with Forestry Corporation of NSW.
10. Clarify the implications of the acquisition of perpetual Crown Lease 1937/1 by the Minister for the Environment as an offset under the terms of a Voluntary Planning Agreement (VPA) for MP10_0137 (Huntlee New Town Development). The VPA, made on 3 December 2010, identifies Lot 165 DP755219 as part of the offsets for that previous development's impacts.
11. Confirm the application of [future acts](#) provisions under the *Cth Native Title Act 1993* under the Commonwealth legislation content, ensuring this has been adequately addressed for the NPWS estate, with respect to the upgrade of NPWS assets and in the establishment of new project infrastructure.

2. Project description as it affects the NPWS estate

On review of the EIS Part 4 (Project Description), NPWS acknowledges and appreciates the significant effort to avoid and minimise the project impacts to the land reserved under the NPW Act.

The project's final line alignment will avoid direct transmission line impacts on Watagans NP and several other reserves proximate to the project's impact area. Additionally, the physical connection of the new transmission line to the existing Transgrid line was redefined to minimise further impacts on Jilliby SCA. NPWS recognises that the direct impacts on land reserved and acquired under the NPW Act are limited to access, ancillary upgrades and adjustment works. NPWS also recognises that the project will directly traverse Corrabare North FR.

NPWS raises only minor matters around clarification of the project's description relative to the proposed access, ancillary upgrades, and adjustment works on the NPWS estate. These are set out below. Confirmation of these essential elements will enable authorisation of the future project's access to the NPWS estate.

NPWS recommends

As part of the EIS addendum report, please

12. Identify NPWS estate park roads and management trails. These consist of roads and trails that form part of the reserve (gazetted into the estate) or Ministerial Roads, which are excluded from the reserved land but held under Part 11 of that Act. These are depicted separately in the spatial data available from *NSW SEED National Parks and Wildlife Service (NPWS) All Managed Land* via <https://datasets.seed.nsw.gov.au/dataset/npws-all-managed-land>.
13. Confirm the access requirements through Watagans NP via Watagans Forest Road as part of the project's activity description, as both secondary construction and emergency egress for the project. Project construction access, likely access upgrades, monitoring of road condition and remediation commitments must be addressed as part of the EIS and the project description.
14. Similar to **Item 14**, clarify if upgrades or widening are required to enable the secondary construction access via Harris Trail and Bowmans Road, which are Ministerial Roads managed as part of the Watagans NP and which link with Watagans Forest Road in Watagans NP. Confirm how this interacts with the memorandum of understanding (MOU) between NPWS and Forestry Corporation for the joint maintenance of the major roads and management trails in the Watagans.
15. Confirm the application of a buffer to the NPWS estate, which will be maintained during final micro-siting of the transmission line corridor where it and its towers interface with Watagans NP and Jilliby SCA (off-park project components). The aim is to prevent future encroachment of any construction works or hazardous tree-clearing requirements on the NPWS estate. Ensure

'no clearing zones' are applied to the Watagans NP and Jilliby SCA (outside the agreed impact area).

16. Commit to reducing native vegetation clearing requirements during project construction in Corrabare North FR, in recognition of the aim of its declaration is to preserve significant flora values.
17. Confirm the extent of access, ancillary upgrades and adjustment works on the NPWS estate as a worst-case scenario, with known, likely and possible requirements to enable the project's construction. NPWS requests more detail on the secondary construction access over Watagans NP, access to the new connection and adjustment activities of the existing Eraring – Kemps Creek 500 kV line (including information on new towers or reinforcing works proposed to the existing line). The Figure/s provided as part of this response may assist – refer to:
 - a. Figure 1: NPWS Central Coast Area – Jilliby SCA - Road Network
 - b. Figure 2a and 2b: NPWS Central Coast Area – Watagans NP – Road Network
 - c. Figure 3: NPWS Wollemi-Yengo Area - Corrabare North FR – Road Network
18. Ensure the EIS adequately sets out, as part of the project description, and considers the NPWS park road, management trail and Ministerial road network listed in Table 1 below, confirming use and upgrades (as and if applicable), and associated impacts attached to any road and trail upgrades or realignments.
19. Confirm construction and upgrade standards for all NPWS roads, management trails and Ministerial roads. Where roads or trails are:
 - a. designated fire trails, they must comply with the Central Coast or Lower Hunter Fire Access and Fire Trail Plan (refer to Table 2 below) as adopted under s.59A of the *NSW Rural Fires Act 1997*. Where part of the strategic fire trail network, all upgrades must be compliant with, or exceed (with approval) design standards set out in the *NSW Fire Trail Standards* (RFS, 2023) at https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0009/69552/RFS-Fire-Trail-Standards-Nov2023.pdf and construction standards as set out in the *NSW Rural Fire Service Fire Trail Design, Construction and Maintenance Manual* (DPI Soil Conservation Service, 2017) via https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0009/97569/Fire-Trail-Design-Construction-and-Maintenance-Manual-FINAL_reducedsize.pdf, or
 - b. unsealed roads, as all other park roads and management trails on the NPWS estate (see Tables 1 and 2 below) require the provision of a road design and engineered construction plan prepared in accordance with NPWS standards based on road classification in consultation with NPWS.
20. confirm if the new line connection and adjustments to the existing Eraring – Kemps Creek 500 kV will require partial or whole, temporary or permanent extensions to the existing easement alignment or width. Clarify the scope of the tie-in works and any extensions requiring '*minor localised widening*' as quoted in the EIS on Jilliby SCA. Noting that this supports the installation of new towers and facilitates the connection of the new line. This will assist NPWS in defining and confirming the correct authorisation pathway under the NPW Act.
21. clarify the scope of ancillary works, as the earth wire and communications systems installation on the existing Eraring – Kemps Creek 500 kV line, as it affects the NPWS estate.

Table 1: NPWS estate park road and management trail network

Road	Identifier
Lot 165 DP755219 NPWS as the Perpetual Lease Holder	
<i>Crumps Road (southern section)</i>	<i>Forestry Road</i>
<i>Crumps Road (northern section)</i>	<i>Forestry Road</i>

Road	Identifier
Jilliby SCA (area around the existing Transgrids line section)	
<i>Martinsville Hill Rd (Primary and Public Access)</i>	<i>Ministerial Road</i>
<i>Cut Rock Fire Trail</i>	<i>Management Trail</i>
<i>Middle Ridge Road</i>	<i>Management Trail</i>
<i>Null Road on Jilliby SCA (which has 4 unnamed trails used for easement purposes)</i>	<i>Management Trail</i>
<i>Unnamed 04 Trail</i>	<i>Management Trail</i>
<i>Woodwards Point Road</i>	<i>Management Trail (Easement)</i>
<i>Stockyard Point Road</i>	<i>Management Trail (Easement)</i>
<i>Watagan Forest Road (Primary and Public Access) on Jilliby SCA (southern section)</i>	<i>Park Road</i>
<i>Prickly Ridge Rd (Primary and Public Access)</i>	<i>Ministerial Road</i>
<i>Watagan Forest Road (Primary and Public Access) on Jilliby SCA (north section)</i>	<i>Ministerial Road</i>
<i>Transgrid Rd Management Trail</i>	<i>Ministerial Road</i>
<i>Tin Dog Point Road</i>	<i>Management trail</i>
<i>Dormant trails as Carroll's Meadow Road and Stockyard Point Road (management trail only, not maintained, and is unused by NPWS).</i>	<i>Management trail</i>
<i>CPT76/3 Road</i>	<i>Management Trail (Easement)</i>
<i>CPT76/4 Road</i>	<i>Management Trail (Easement)</i>
<i>CPT 74/2 Road</i>	<i>Management Trail (Easement)</i>
<i>Collection of unnamed roads as shown in Figure 1</i>	<i>Management Trail</i>
Watagans NP (identified as secondary construction access)	
<i>Bowmans Road</i>	<i>Ministerial Road</i>
<i>Harris Trail (goes into Bowmans Road)</i>	<i>Ministerial Road</i>
<i>Watagan Forest Road (Primary and Public Access) on Watagans NP</i>	<i>Park Road</i>
Corrabare North FR	
<i>North Road</i>	<i>Forestry Road</i>
<i>Jurds Road</i>	<i>Forestry Road</i>
<i>Jacobs Road</i>	<i>Forestry Road</i>
<i>Hawkins Road</i>	<i>Forestry Road</i>

3. Aviation-based operations on, and proximate to, the NPWS estate

On review of the EIS and *Technical Report 16 - Hunter Transmission Project Aviation Impact Assessment Version 2.1 (AIA)*, prepared by Aviation Projects, dated 9 July 2025, NPWS raises the matters below, focusing on the NPWS estate and the agency's aerial operations. NPWS recognises that CASA requires consideration of an area of interest covering 10 km from the project impact area with respect to non-certified aerodromes (NCA) and helicopter landing sites (HLS).

In summary, the EIS acknowledges that the project will affect aerial operations and the use of aircraft in the location of the transmission lines. However, due to the tower size, they will be highly

visible structures readily identified by pilots at a sufficient distance to be avoided during the day, with the transmission lines recognised as less visible and representing the greatest risk.

The EIS and AIA, in considering impacts to NPWS and its park management operations, only recognised aerial baiting with helicopters, which, unfortunately, is not a true representation of the full scope of aerial operations conducted by the agency.

NPWS recommends

As part of the EIS addendum report to:

22. recognise the NPWS HLS-helipads on the NPWS estate which occur within the 10Km area of interest associated with the project's impact area at the Sawmill site off Martinsville Road and McCanns Ridge along Watagans Forest Road on Watagans NP.
23. consider the impacts of the project associated with the HLS-helipads location and use on the NPWS estate.
24. recognise that NPWS can construct and utilise helipads on the NPWS estate during emergency or incident-based situations anywhere at any time.

As part of the AIA addendum report to:

25. confirm the aviation requirements and standards in relation NPWS estate, which has, and use both helicopters and fixed-wing aircraft in park management operations.
26. clarify and assess the implications on the HLS-helipads located on the NPWS estate at the Sawmill site off Martinsville Road, latitude -33.08286 longitude, 151.35807, and McCanns Ridge along Watagans Forest Road, latitude -33.0082 longitude, 151.3936, on Watagans NP.
27. consider NPWS as an agency that operates its own aircraft on NPWS estate, and as a relevant stakeholder in all aviation planning as it affects the NPWS estate, and within 8km of our estate's legal boundary. As NPWS retains a statutory obligation to respond to threats to its estate, originating outside its area of administration.
28. confirm that NPWS undertakes a number of complex and low-level flight operations on the NPWS estate, and proximate to the estate, such as aerial firefighting, baiting and spraying, vertebrate pest and fauna surveys, emergency response and infrastructure construction and servicing. NPWS highlights that some of the aerial operations will, and do occur in low light and visibility conditions at lower levels than discussed in the AIA.
29. recognise risk to NPWS HLS operation and aircraft use on the NPWS estate during both construction and operation of the transmission line, setting out effective long-term strategies to maintain safe operations of aircraft. NPWS, as a public land manager, would like to request the following for its estate:
 - a. installation of line marker balls, subject to AS3891 - Air Navigation - Cables on overhead infrastructure, as a visual warning.
 - b. obstacle lighting on towers to reduce the risk of collision during low visibility operations on the NPWS estate, but only if lighting can be operated, generally remaining off with the ability to be switched on during emergency operations.

As part of any future operational plans and conditions to:

30. consider the use of drones and aircraft as it affects the NPWS estate, taking into account the *NPWS Drones in parks policy* (NPWS, 2016) via <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-policies/drones-in-parks> and if any project-based filming is to occur on the NPWS estate under the *NPWS Filming and Photography Policy* (NPWS, 2010) via <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-policies/filming-and-photography>.

31. identify NPWS as a key agency during the preparation of all key construction environmental management plans, relevant emergency planning, and aerial operations planning associated with the project.
32. recognise risk to NPWS HLS and aerial operations conducted on the NPWS estate during project construction, setting out effective strategies to maintain safe operations associated with the project.
 - a. confirming that NPWS is a bushfire firefighting authority operating its own aircraft for this purpose, and as part of general park management operations. Noting that aerial operations will, and do occur in low light and visibility conditions at low levels.
 - b. ensuring NPWS is provided with the final transmission line design and tower placement data as a georeferenced spatial file, with recorded coordinates of all transmission tower locations, crane operational areas and line alignment with allocated restricted (flight) areas. Before construction commences.
 - c. ensuring notification to NPWS of any tower location siting modification occurring during construction with updated data provision (as per **Item 32(b)**).
 - d. notifying NPWS before tower construction commences, and construction location updates where use of the cranes occurs for tower installation, or any at-height construction assets, including any safety cabling, framework or meteorological masts.
 - e. notifying NPWS of project flight plans, to ensure helicopter and drone operations (including wire installation) are communicated and coordinated during construction where the operations are on the NPWS estate and/or within 8km of the NPWS estate boundary.
 - f. notification to NPWS should be directed to:
 - i. NPWS Aviation Duty Officer, phone (02) 9895 6455 or via email npws.aviation@environment.nsw.gov.au, and
 - g. NPWS Manager, Wollemi – Yengo Area, responsible for Corrabare North FR and Lot 165 DP755219, via area mailbox: npws.wollemiyengo@environment.nsw.gov.au or office phone: 02 6574 5555, or
 - h. NPWS Manager, Central Coast Area, responsible for Jilliby SCA and Watagans NP, via area mailbox npws.centralcoast@environment.nsw.gov.au, or office phone: 02 4972 9000.

4. Bushfire management on the NPWS estate

On review of the EIS and *Technical Report 14 - Hunter Transmission Project Bushfire Risk Assessment (BFRA) Revision 4, prepared by GHD Pty Ltd dated 15 February 2025*, NPWS raises the following matters, focusing on the NPWS estate, NPWS's role as public land manager and requirements of the *NSW Rural Fires Act 1997*.

Currently, the BFRA focuses on the application of *Australian Standard AS3959:2018 Construction of buildings in bushfire-prone areas*, risks attached to the Pokolbin, Corrabare and Olney State Forest areas, impacts on public safety and the environment. The consultation in the preparation of the BFRA appears to be restricted to FCNSW. FCNSW had the opportunity to provide a strategic insight into firefighting operations and its strategic fire trails.

NPWS recommends

As part of the EIS addendum report to:

33. confirm and set out the application of the *Rural Fires Act 1997*, with respect to the management of bushfires on the NPWS estate as public land, covering risks and the statutory application of the *NSW Rural Fires Act 1997*.

As part of the BFRA addendum report to:

34. consider the project as it affects the NPWS estate in the context of the Central Coast and Lower Hunter published *Bush Fire Risk Management Plans* and the supplementary Central Coast and Lower Hunter *Fire Access and Fire Trail Plan* (FAFT Plans).
35. complete an assessment of the strategic fire trail network, implications for wildfire response and hazard reduction works for the management of bushfire operations on the NPWS estate.
36. consider bushfire management implications and protection of sensitive areas on the NPWS estate associated with the published NPWS estate reserve fire management strategies, as:
 - a. *Jilliby State Conservation Area Fire Management Strategy* (DEC, 2006)
 - b. *Watagans National Park Reserve Fire Management Strategy* (DEC, 2006)
37. recognise the NPWS estate strategic fire trail network, highlighting fire trail designation and category as set out in the relevant FAFT Plan, refer to Table 2 below.
38. confirm designated fire trails under either the Central Coast or Lower Hunter *Fire Access and Fire Trail Plan* (refer to Table 2 below) as adopted under s.59A of the *NSW Rural Fires Act 1997* and identify the NPWS estate strategic fire trail, all upgrades must be compliant with, or exceed (with approval) the *NSW Fire Trail Standards* (RFS, 2023) via https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0009/69552/RFS-Fire-Trail-Standards-Nov2023.pdf with construction standards as set out in the *NSW Rural Fire Service Fire Trail Design, Construction and Maintenance Manual* (DPI Soil Conservation Service, 2017) via https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0009/97569/Fire-Trail-Design-Construction-and-Maintenance-Manual-FINAL_reducedsize.pdf.
39. confirm that NPWS estate access will be retained to ensure NPWS can adequately react to bushfire emergencies. Noting that retention of strategic fire trail access is critical, and blocking or closing access is an offence under Division 7, Part 3B of the *Rural Fires Act*, ensure arrangements are in place before construction commences.

As part of any future emergency or bushfire management plan, and condition to:

40. identify NPWS as a key agency during the preparation of all key construction environmental management plans, relevant emergency planning, with respect to bushfire planning and associated with the project.

Table 2 – NPWS estate strategic fire trail network

Road	Designation	Category
<i>Crumps Road</i>	<i>Strategic</i>	<i>Category 1</i>
<i>Crumps Road (northern section)</i>	<i>Tactical</i>	<i>Category 1</i>
<i>Martinsville Hill Rd (Primary and Public Access)</i>	<i>Strategic</i>	<i>Category 1</i>
<i>Middle Ridge Road</i>	<i>Strategic</i>	<i>Category 1</i>
<i>Prickly Ridge Rd (Primary and Public Access)</i>	<i>Strategic</i>	<i>Category 1</i>
<i>Watagan Forest Rd (Primary and Public Access)</i>	<i>Strategic</i>	<i>Category 1</i>
<i>Tin Dog Point Road</i>	<i>Tactical</i>	<i>Category 1</i>
<i>Harris Fire Rd Secondary Access Road (Public Access)</i>	<i>Strategic</i>	<i>Category 1</i>
<i>Bowmans Road</i>	<i>Strategic</i>	<i>Category 7</i>
<i>North Road (or Sweetmans Creek Road)</i>	<i>Tactical</i>	<i>Category 7</i>

5. Emergency access across the NPWS estate

On review of the EIS Section 21 (Hazards and Risks), NPWS raises the following matters, focusing on the NPWS estate and use of emergency evacuation routes as they affect Watagans NP. Noting that the nominated emergency evacuation routes and any emergency helipad construction, as identified in the emergency scenarios, do not form part of the EIS.

NPWS recommends

As part of the EIS addendum report to:

41. Confirm that the emergency evacuation routes are fit for purpose, requiring no further environmental assessment under the EIS. If upgrades or maintenance works are required, consider as part of the EIS. As this route affects the Watagans NP, confirmation is required as part of the project's authorisation.
42. Clarify the park roads, and/or ministerial roads, that are included in the emergency evacuation route identification. Is this just Watagan Forest Road on Watagans NP, or the ministerial roads known as Harris Trail and Bowmans Road?
43. Confirm the procedures for the creation of emergency helipads should these be required within the NP estate.

6. Conservation of Aboriginal cultural heritage values on the NPWS estate

On review of the EIS and *Technical Report 2 - Aboriginal Cultural Heritage Assessment - Hunter Transmission Project Version 6 (ACHA)*, prepared by EMM Consulting Pty Ltd, dated 4 August 2025, NPWS raises awareness that for land administered under the NPW Act, the agency has a role in the protection and conservation of Aboriginal cultural heritage. NPWS, in the matters raised below, would like to improve management around the in-situ retention and protection, application of mitigation measures, and the respectful management of Aboriginal objects on the NPWS estate where impacts are attributed to the project.

Heritage NSW remains responsible for the statutory application of Part 6 of the NPW Act and all off-park requirements.

NPWS recommends

As part of the EIS addendum report to:

44. Confirm that NSW DCCEEW Heritage is the responsible authority for Aboriginal cultural heritage and the application of Part 6 of the NPW Act. NPWS's role is in the protection and conservation of cultural values with respect to land administered under the NPW Act.

As part of the ACHAR addendum report to:

45. Include as part of the 'ACHAR Summary', recognition of the NPWS estate impacts consistent with the SEARs. The ACHA should acknowledge that the project will directly affect the NPWS estate in accordance with **Item 2** above.
46. Confirm NPWS's role is in the protection and conservation of cultural values with respect to land administered under the NPW Act.
47. Consider the statutory obligations under the NPW Act, with a review of Sec.A.2.2 in Appendix A of the ACHA, addressing the provisions of the NPW Act and NPW Regulation (subject to **Item 4** above) with respect to protection of cultural values on the NPWS estate.
48. Ensure consideration is given to the avoidance and in-situ management of rock shelters on the NPWS estate. NPWS requests avoidance of impacts to cultural values through micro-siting the towers on Corrabare North FR and, where avoidance is not possible, controlled movement of

objects to preserve cultural values (refer to Table 4 below). For the NPWS estate, consider a conservation hierarchy with the Registered Aboriginal Parties for the project, focusing on the priority in-situ conservation of burials, rock shelters, scar trees, grinding grooves and extensive artefact scatters, followed by the controlled movement of artefact scatters or isolated finds to ensure preservation of values.

49. Reconsider and confirm how '*isolated finds and low-density artefact scatters*', as described in the ACHAR, will be managed where they occur on the NPWS estate. Currently, the ACHA states that no management is afforded. NPWS will only accept this type of action if justified under the ACHA, under the direction of the Registered Aboriginal Parties (RAPs). As the intent of the NPW Act is to conserve Aboriginal objects on land administered under that Act, NPWS wishes to focus on in-situ protection. As the land manager for Corrabare North FR, NPWS apply the principles consistently across all managed lands. Values identified or known on the NPWS estate are recognised in Tables 3 and 4, this does not cover the likely risk of unexpected finds occurring during the project's construction. All management of Aboriginal objects on the NPWS estate is to involve, and as a decision made by the RAPs for the project.
50. Reconsider and confirm management of what is defined as '*background scatter sites*' forming HTP-S-BS1 on the NPWS estate. In the ACHA, this is the broader scatter of isolated Aboriginal objects and/or low-density artefact scatters (<20 per square metre) found disparately across the project now, and during construction (as HTP-N-BS1; HTP-C-BS1; HTP-S-BS1). The ACHA again states no management is recommended, noting that recovery of such material has limited scientific value. NPWS questions this position as scientific value is very different from cultural significance or value. The Aboriginal objects referred to often have deep meaning to the Aboriginal community. So, for the NPWS estate, it will remain the decision of the RAPs to identify, confirm cultural significance, and advise on the treatment of Aboriginal objects recovered from the NPWS estate.
51. Consider management options for Aboriginal objects recovered or displaced during construction on the NPWS estate, with one of four scenarios:
 - a. retention of Aboriginal objects and sites, with protection in situ. With protection and conservation actions set out under a conservation plan, including methods for retaining, stabilising sites, and monitoring construction activities. In-situ protection should also consider and detail any ongoing preservation, asset management actions and data recording.
 - b. moving Aboriginal objects outside of the project's impact area into selected restricted areas, before works commence. Include methods, the involvement of Aboriginal community representatives, and protection measures, with recording of receiving sites.
 - c. relocation or repatriation to an identified safekeeping place as determined by the RAPs. Ensuring archival recording and management are subject to Heritage NSW and NPWS guidelines and procedures. This includes appropriate environmental assessment and recording of receiving sites.
 - d. Aboriginal objects can be held under safekeeping by an Aboriginal person or organisation subject to a care agreement. If Aboriginal owners wish to take ownership, this can be done under a transfer agreement. Refer to the NSW Environment and Heritage website - <https://www.environment.nsw.gov.au/topics/heritage/apply-for-heritage-approvals-and-permits/aboriginal-objects-and-places/apply-care-agreement-transfer-objects>.
52. Ensure that any salvage operations identified in the ACHA relating to the NPWS estate result in either Aboriginal objects being retained and assessed on the estate or subject to a care agreement. NPWS does not support the removal of Aboriginal objects from the NPWS estate without agreement from the Aboriginal community and approval from the relevant NPWS Director. If any archaeological excavation of cultural deposits, for scientific or archival recording purposes, is conducted, then analysis of these is to be completed on the NPWS estate unless it is specific dating or microanalysis.

53. Ensure any removal or relocation of any culturally modified trees (refer to Table 4 below) on NPWS estate, either in its entirety and/or via the removal of the 'scar' portion of the tree, is undertaken by a Level 5 Qualified Arboriculturist only once a conservation plan has been prepared by a heritage consultant with input from the Aboriginal community and with approval from the relevant NPWS Director. The plan must detail the method of removal, relocation site details, methods for the long-term curation and conservation, and any preservation actions are to be set out as required.
54. Revise Sec A.1.3 *Native Title Act 1993* Appendix A (Legislation), which references the application of future Acts around the rights and interests over lands and waters by Aboriginal people, but does not address the actual project implications of the [future acts](#) regime. Ensure this is adequately addressed for the NPWS estate.

As part of the future preparation of the Aboriginal Cultural Heritage Management Plan (ACHMP)

55. Identify NPWS as a key agency in the preparation and implementation of actions under the ACHMP where those actions affect the NPWS estate. Use of the NPWS estate in the delivery of the options listed in **Item 51** requires approval from the relevant NPWS Director.
56. Ensure that the ACHA and future ACHMP are uploaded to the NSW Aboriginal Heritage Information Management System (AHIMS), where new sites are created, or records modified on the NPWS estate. This ensures continuity in information associated with projects that have occurred on the NPWS estate.
57. Ensure any future ACHMP addresses:
 - a. matters raised about representatives for the Darkinjung people, around the management of the risk of ancestral burial site/s occurrence on Jilliby SCA. Identifying areas of likely harm, risk management, and migration measures are in place.
 - b. priority criteria for micro-siting of the project tower and ancillary construction requirements on the NPWS estate to ensure in-situ protection and conservation as a priority.
 - c. movement or repatriation of displaced or excavated archaeological material on the NPWS estate is to comply with NPWS guidelines and procedures.
 - d. ensure all Aboriginal objects retained in situ, moved, or relocated are recorded on AHIMS through an AHIMS site card update or site card impact form as soon as possible.
 - e. ensure the provision of a translocation plan to support the relocation of key species attached to the actions associated with Aboriginal resource and gathering values, as per Tables 3 and 4 below, accord with the NSW Translocation policy and procedure - <https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/programs-legislation-and-framework/translocation>.

Table 3 – Jilliby SCA – Project impact area

Site ID/Name	Type	Description/Info
45-3-2460	Isolated find	1 flake on Martinsville Road
45-3-2453	Artefact Scatter	5 artefacts (exposed) recorded as a low-density artifact scatter on Martinsville Road
45-3-2452	Artefact Scatter	4 artefacts (exposed) recorded as a low-density artifact scatter on Martinsville Road
45-3-2458	Artefact Scatter	2 artefacts (exposed) recorded as a low-density artifact scatter on the TransGrid line access – Stockyard Point Road.
45-3-2465	Isolated find	1 flake on the management trail south of Prickly Ridge Road leading to Tin Dog Point Road.

Site ID/Name	Type	Description/Info
45-3-2466	Isolated find	1 flake on (exposed) recorded as a low-density artifact scatter on the TransGrid line access point, which is identified as " <i>Unnamed Trail – 04</i> " – a Transmission line access trail called CPT 76/4 Road leading to Tin Dog Point Road.
45-3-3174/ 45-3-3175	Grinding Grooves	9 grinding grooves, and a water hole (well) located near the headwaters of an ephemeral drainage line, east of Tin Dog Point Road. • AHIMS #45-3-3174 records 4 grinding grooves and a well, • AHIMS#45-3-3175 records 5 grinding grooves
45-3-2467	Isolated find	1 flake on the management trail surface at Tin Dog Point Road
HTP-S-CS01	Wishing well	Constructed well on Martinsville Road over spring, shared cultural heritage value – Contemporary site.
45-3-2457	Artefact Scatter	3 artefacts (exposed) recorded as a low-density artifact scatter on Prickly Ridge Road
HTP-S-AR01	Aboriginal resource and gathering	1 former spring that may have been used by Aboriginal people in the past. Complete loss of value and complete harm – trimming activities and ancillary activities at Becketts Road – plan to recover and relocate key species, Aboriginal resources, and gathering
HTP-S-BS1	background scatter sites	A stone artefact background scatter that is predicted to occur intermittently across the project impact area and extending beyond its limits, within which disparate low to moderate artefact densities of $\leq 20/m^2$ may be expected intermixed with culturally sterile zones.

Table 4 – Corrabare North FR – Project impacts (HTP corridor and management trails)

Site ID/Name	Type	Description
HTP-C-CMT05	Scarred Tree	1 confirmed culturally modified Turpentine <i>Syncarpia glomulifera</i> , considered to denote a traditional boundary marker, single east-facing scar recorded at the base of a gully 10 m west of an unnamed creek and 260 m east of North Road. Complete loss from Corrabare North FR
HTP-C-RS02	Rock Shelter	low overhang, no art or surface deposits located and no deposit, but accords with the definition of archaeological rock shelter site. Located 200 m west of the junction of Hawkins Road and Sweetmans Creek Road. Complete loss from Corrabare North FR
HTP-C-AR03	Aboriginal resource and gathering	Complete loss of value and complete harm - plan to recover and relocate key species, Aboriginal resources, and gathering sites
HTP-C-RS18	Rock Shelter	A potential east-facing rock shelter situated on a gently inclined hillslope. No surface artefacts were identified. No art or evidence of charcoal, however, is considered by RAPs as a good vantage point looking over the creek line. A small hole in the north wall is also considered to aerate smoke from fires within the shelter. NPWS advises caution, investigation and in situ protection
HTP-C-RS01	Rock Shelter	A potential north-facing sandstone overhang is located 90 m northwest of Hawkins Road and 140 m northeast of a drainage channel at the top of a steep rise. The exposed shelter floor was

Site ID/Name	Type	Description
		mostly bedrock with extensive weathering noted throughout. No cultural markers were identified at the time of the survey. NPWS advises caution, investigation and in situ protection
HTP-C-RS03	Rock Shelter	A potential south-easterly facing rock shelter situated on a steep slope. No art or artefacts were noted at the time of the survey. There is considered to be a PAD at this site. NPWS advises caution, investigation and in situ protection

7. Historic and shared heritage values on the NPWS estate

On review of the EIS and *Technical Report 7 - Hunter Transmission Project – Historic Heritage Impact Statement (HHIS)*, prepared by Biosis Pty Ltd, Version 4 (final), dated February 2025, NPWS provides the following advice on impacts to heritage values.

NPWS recommends

Including as part of the EIS addendum report to:

58. Recognise the formal protection of cultural values under the NPW Act and the NSW *National Parks and Wildlife Regulation 2019* (NPW Regulation) for items on the NPWS estate.
59. Recognise NPWS heritage assets as listed on the Historic Heritage Information Management System (HHIMS), as items on the NPWS s.170 *Heritage Act 1977* Heritage Conservation Register. Those items applicable to the NPWS estate:
 - a. Wishing Well (Osf 26) as HHIMS Item ID 630 will be impacted by the project.
 - b. Original Forest House (Osf 15) as HHIMS item ID 653, and
60. Recognise the sawmill site on the Cnr Martinsville Hill Road and other heritage values attached to Watagans NP and Jilliby SCA depicted on Figure 3 (European Heritage) under the adopted *Watagans National Park and Jilliby State Conservation Area Plan of Management* (DECCW, 2010), as the adopted statutory plan, refer to <https://www.environment.nsw.gov.au/publications/watagans-national-park-and-jiliby-state-conservation-area-plan-management> and in the application of the NPW Act.
61. Confirm outcomes for the Wishing Well, the attached spring, archival processes and mitigation measures to ensure significance is not entirely lost.

Including as part of the HHIS addendum report to:

62. Recognise the formal protection of cultural values under the NPW Act and the NSW *National Parks and Wildlife Regulation 2019* (NPW Regulation) on the NPWS estate. Consider the statutory obligations with the protection of heritage under the NPW Act (as per **Item 4** above).
63. Include a formal heritage assessment of the Wishing Well.
64. Confirm protection and mitigation measures for heritage items in the vicinity of the construction works, ensure no loss of the items' significance, or loss of important historical values associated with the Original Forest House (Osf 15) as HHIMS item ID 653, and the Sawmill site on Jilliby SCA.
65. Confirm loss and management of HHIMS Item ID 630 (Wishing Well) and detected impacts to the sawmill site, committing to:
 - retention and protection of the spring as a functional water supply, and address future access post-project construction. Confirm the effect of the proposed “*widening and upgrades to*” Martinsville Road to a 30m wide corridor. Providing the retention/redesign of the spring as part of the upgraded road concept / engineered design.

- protocols for management of artefacts or relics (heritage) associated with the sites in accordance with Heritage NSW guidelines
- archival processes for the recording of cultural values, both in their landscape, and historic and shared heritage context in accordance with Heritage NSW guidelines, as supported by the requested assessment (see **Item 62**).
- discussion on community feedback on the loss of the Wishing Well.
- relocation and reconstruction of the Wishing Well structure to the preferred heritage precinct site attached to the sawmill on Jilliby SCA, with implementation of an interpretive package informed by the Heritage Assessment. The relocation will need to accord with heritage conservation best practice and ensure the receiving site is adequately assessed in accordance with NPWS environmental impacts and risk assessment procedures.
- set out processes under the Heritage Act to remove the s.170 heritage register item from the NPWS register, and commence processes soon after removal.
- management of unexpected finds as historical archaeological relics if deposits or relics not identified and considered as part of the HHIS or EIS are discovered on the NPWS estate. All work must cease in the affected area(s), with Heritage NSW and the Heritage Council of NSW notified.

As part of the future historic heritage management plan (HHMP), condition:

66. Ensure NPWS is identified as a key agency in the preparation of the HHMP, where it addresses heritage impact management and mitigation measures for values occurring on the NPWS estate.
67. Preparation of the HHMP is to consider and adhere to NPWS guidelines in the management of heritage values on the NPWS estate.

8. Recognition of biodiversity loss on the NPWS estate

On review of the EIS and the *Technical Report 1 - Hunter Transmission Project Biodiversity Development Assessment Report* (BDAR), prepared by WSP, Alex Cockerill, Accredited Assessor, BAM BAAS1700, dated 21 August 2025, NPWS raises the following statutory considerations of the NPW Act in the recognition of likely impacts to natural values afforded protection under that Act.

NPWS recommends

Including as part of the EIS addendum report to:

68. Recognise Jilliby SCA as an environmentally sensitive area of state significance as defined in [s.2.2](#) of the *State Environmental Planning Policy (Planning Systems) 2021*.
69. Recognise the NPW Act as NSW legislation that protects and conserves natural values (landscapes and biodiversity) on land administered under that Act (refer to **Item 4** above).

Including as part of the BDAR addendum report to:

70. Accord with the SEARs as issued with respect to the NPWS Estate (refer to **Item 2** above).
71. Recognise that the NPW Act is NSW legislation that protects and conserves natural values as landscapes and biodiversity on land administered under that Act (refer to **Item 4** above).
72. Recognise Corrabare North FR, and the reserve's role in the delivery of the NSW Government's stated commitments under the *NSW Koala Strategy 2018* and in its purpose in the protection of significant native flora and habitat values relevant to its declaration as a flora reserve under the Forestry Act.
73. Recognise Lot 165 DP755219 as offset lands, with the perpetual lease vested in the NSW Minister for the Environment consistent with the terms of the Voluntary Planning Agreement

accepted as part of a Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) planning approval. Consider the implications of the project (including the scope of works proposed for the Crumps Road works) on the offset lands, and calculate the residual impact under the BDAR – refer to **Item 10** above.

Consider as part of the Strategic Offset Delivery Agreement (SODA) preparation

74. Recognise NPWS as a key agency in the preparation of the SODA, so that the agreement will specifically address offset obligations associated with the loss of land and natural values on the NPWS estate, including the perpetual lease acquired as an offset for MP10_0137.
75. Consider the NPWS policy and procedures in the acquisition and reservation of potential areas suitable for addition to the NPWS estate.
76. Ensure, consistent with the nature-positive provisions of the *Biodiversity Conservation Act 2016*, that the SODA considers species focused programs for the koala to account for the loss of forest in Corrabare North FR which was protected as part of the *NSW Koala Strategy 2018*.

9. Environmental quality on the NPWS estate

On review of the EIS, and the Technical Reports listed below for air quality, noise and visual amenity, NPWS confirms that impacts on air quality, noise, surface and groundwater as part of the project. Their severity and longevity were considered against the values attributed to the NPWS estate. NPWS requested consideration of the NPWS estate as a sensitive receiver as both a ‘*public recreational areas*’ and one supporting significant biodiversity values (an ecological receiver) with effects attributed to dust, noise, vibration, erodible soils, surface and groundwater flow changes.

- *Technical Report 3 - Hunter Transmission Project - Landscape character and visual impact assessment (LCVIA) (Parts 1-4) prepared by IRIS Visual Planning and Design, dated August 2025.*
- *Technical Report 8 - Hunter Transmission Project – Noise and vibration impact assessment (NVIA) prepared by SLR Consulting Australia, dated August 2025.*
- *Technical Report 9 - Hunter Transmission Project – Soil and Land Resource Assessment, final Version 3, prepared by Minesoils Pty Ltd, dated July 2025.*
- *Technical Report 10 - Hunter Transmission Project – Surface Water Impact Assessment, Version 6, prepared by EMM Consulting Pty Ltd, dated 6 August 2025.*
- *Technical Report 11 - Hunter Transmission Project – Groundwater Impact Assessment, Version 7, prepared by EMM Consulting Pty Ltd, dated 8 July 2025.*
- *Technical Report 18 - Hunter Transmission Project - Air quality and greenhouse gas impact assessment (AQGHIA) Version 7, prepared by EMM Consulting Pty Ltd, dated 4 August 2025.*

NPWS recommends

Including as part of the EIS addendum report to:

77. Confirm consideration of park users and visitors on the NPWS estate as ‘sensitive human receivers’.
78. Confirm that the NPWS estate forms part of the ‘sensitive ecological receiver’ definition.

Including as part of the NVIA addendum report to:

79. Confirm consideration of park users and visitors on the NPWS estate as ‘sensitive human receivers’, and the recreational/social values attributed to nature-based recreational values of the NPWS estate.

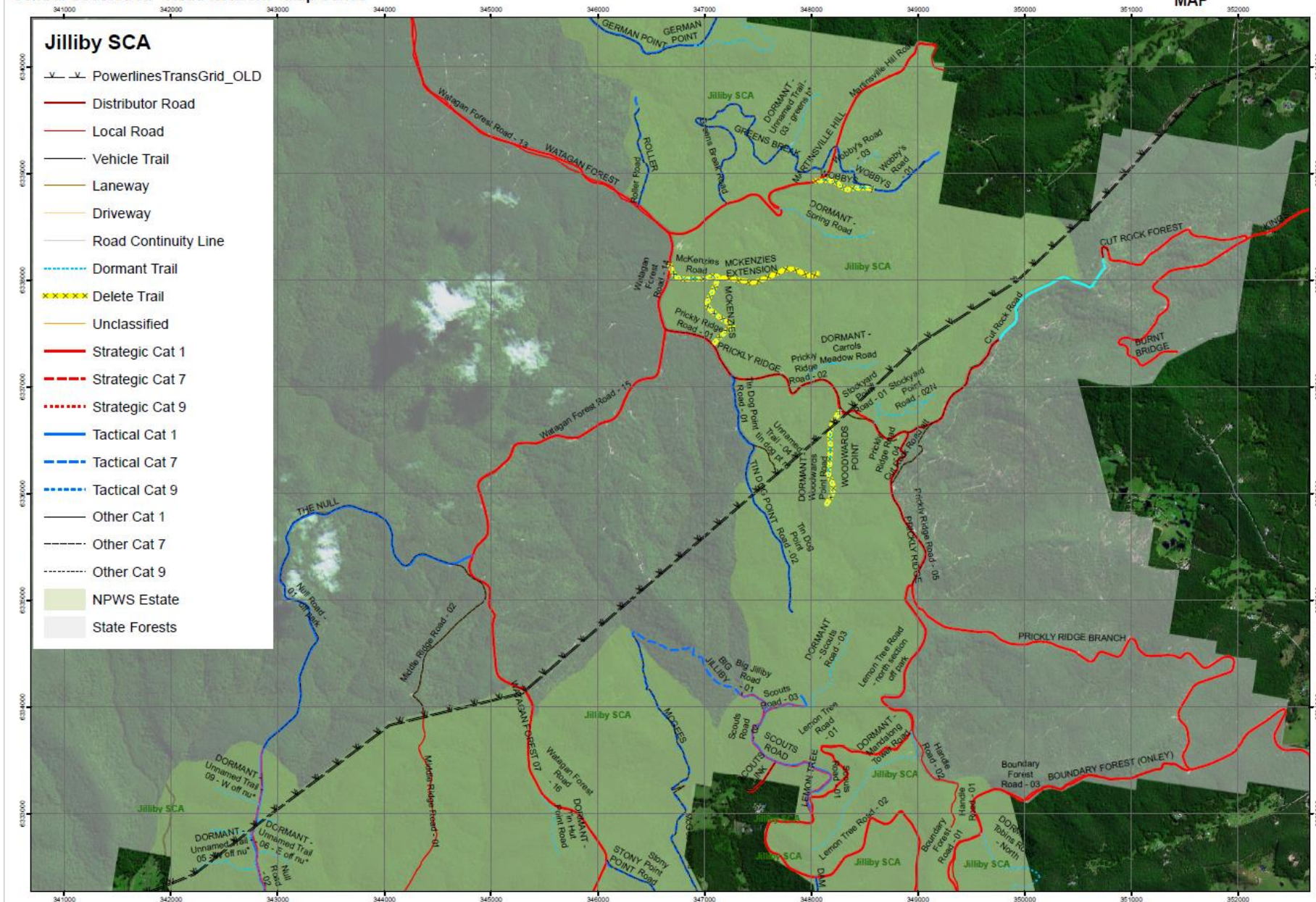
80. Confirm that the NPWS estate was considered as part of the sensitive ecological receiver, and explain how this was considered with predicted noise levels over 40dBA, which are known to affect and displace wildlife. Include an explanation of adequate mitigation to acknowledge and monitor biodiversity impacts for noise and vibration.
81. Consider application of the NPWS Policy Landslides and rockfall policy and procedures as part of the vibration impacts and management of risk as it relates to the NPWS estate (see <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/park-policies/landslides-and-rockfalls>).

Including as part of the LCVIA addendum report to:

82. Consider the impacts of dust deposition on the frog ponds in Jilliby SCA (as a specific example of a sensitive ecological receiver on the NPWS estate).

Including as part of the future environmental management planning, conditions:

83. Ensure NPWS is identified as a key agency in the preparation of environmental management plans where construction will affect the NPWS estate.



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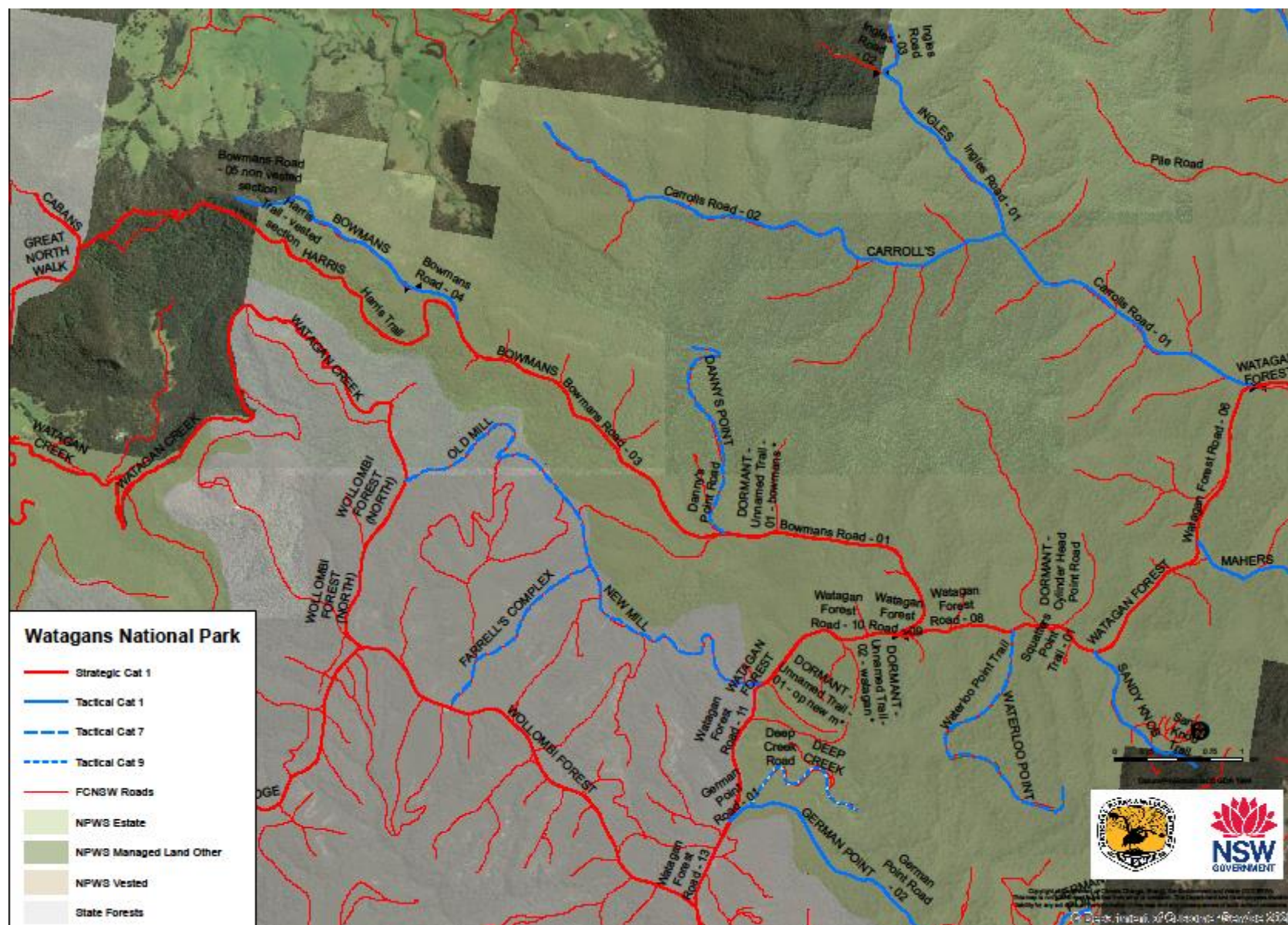


Figure 2b: NPWS Central Coast Area – Watagans NP – Road Network (showing Bowmans Road, Harris Trail)

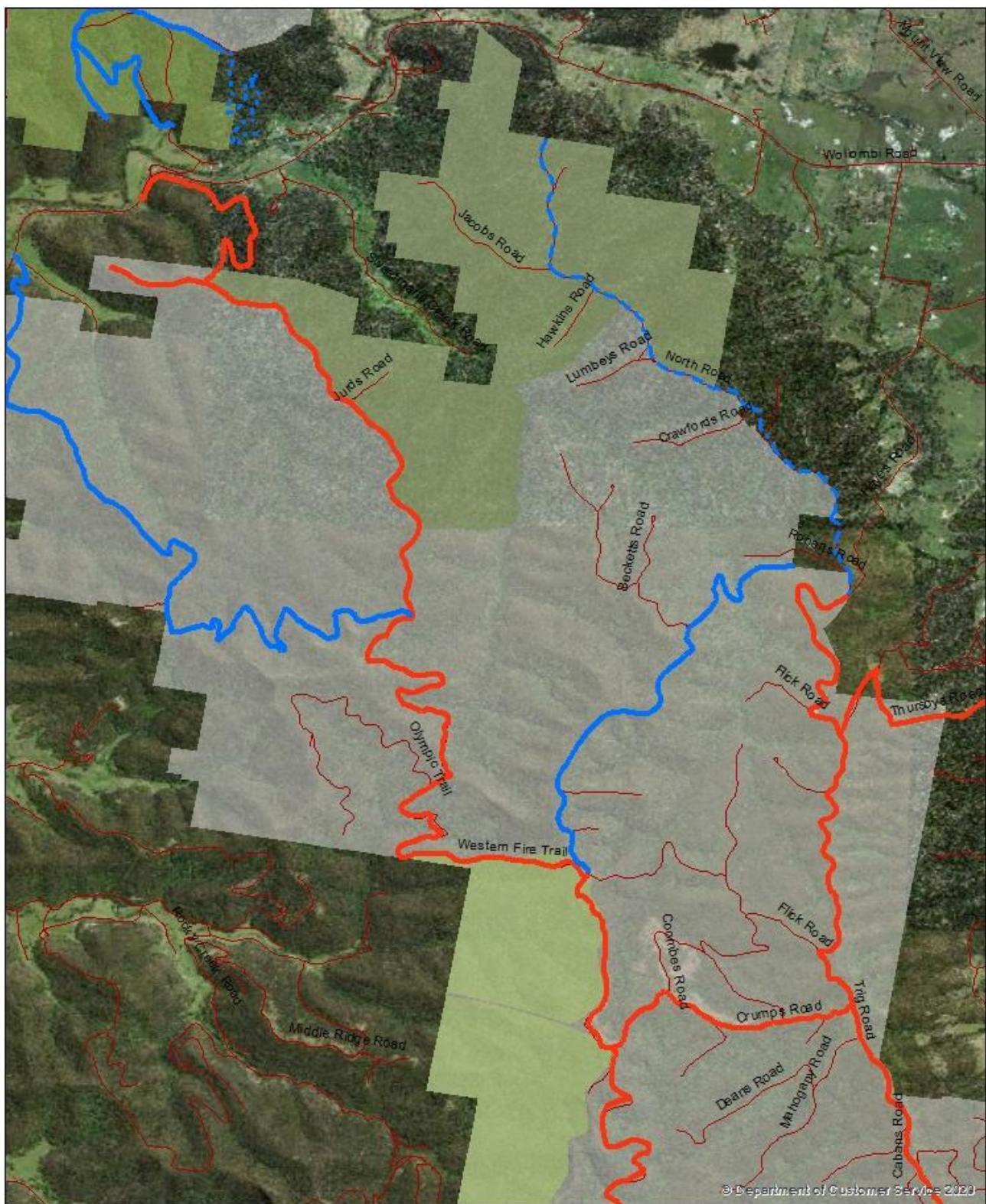


Figure 3: NPWS Wollemi Yengo Area - Corrabare North Flora Reserve and Lot 165 DP755219 – Road Network