Our ref: DOC25/726556
Your ref: SSI-70610456

Kurtis Wathen
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
kurtis.wathen@dpie.nsw.gov.au

Dear Kurtis

Re: Hunter Transmission Project Response to Submissions (SSI-70610456)

Thank you for your email request, of 20 February 2026, to Conservation Programs, Heritage and Regulation Group (CPHR) of NSW Department of Climate Change, Energy, the Environment and Water (NSW DCCEEW) inviting comments on the Response to Submissions report (RTS) for the Hunter Transmission Project (HTP).

CPHR is working with EnergyCo to address issues raised from our review of the exhibited Environmental Impact Statement (EIS) and Biodiversity Development Assessment Report (BDAR). The remaining matters to be addressed are detailed in **Attachment A** and relate to:

- survey results for 9 threatened species which are currently being compiled - EnergyCo will provide these for CPHR review, including the species polygons when finalised
- species polygons for threatened owls updated to include contiguous vegetation zones
- species polygon for *Rhizanthella slateri* reduced to reflect refined areas of suitable habitat
- identification of the impact of machinery tracking through derived native grassland in Disturbance Area B to clear woody vegetation.

By addressing these issues, CPHR considers that there are no further outstanding issues and that EnergyCo will have finalised its BDAR in accordance with the *Biodiversity Conservation Act 2016* and the Biodiversity Assessment Method.

In relation to serious and irreversible impacts (SAII), a summary in relation to each SAII entity is provided in **Attachment B**. This provides advice to DPHI about each species to support its decision on whether the proposed impact meets the statutory definition of a serious and irreversible impact, which is when an impact is likely to contribute significantly to the risk of a threatened species or ecological community becoming extinct. CPHR notes EnergyCo's significant work to avoid and reduce impacts on threatened frog species including:

- addition and relocation of several transmission towers to increase heights and spans across waterways and breeding habitat
- establishment of no-clearance areas around waterways
- removal of the Tower 6 stringing site to avoid direct impacts to breeding habitat
- introduction of sensitive hand-clearing zones and buffers at waterway crossings to minimise disturbance
- commitment to an amphibian management plan and comprehensive erosion and sediment controls

- avoidance of 60 of 62 artificial breeding ponds established by University of Newcastle and funding of species resilience actions proposed by University of Newcastle
- commitment to supplementary habitat installation encouraging connectivity within the switching station footprint.

CPHR's review of our EIS recommendations relating to flood risk management and surface water assessment compared to the RTS documents is included in **Attachment C.**

If you have any questions about this advice, please do not hesitate to contact Dr Michelle Cox, Manager Biodiversity Assessment Method and Renewable Energy Biodiversity Support via michelle.cox@dcceew.nsw.gov.au or 02 9995 6733.

Yours sincerely

Dr Louisa Mamouney
Executive Director, Conservation Planning and Offsets

Conservation Programs, Heritage and Regulation Group

13 March 2026

Attachment A – CPHR Review of the of the Response to Submissions

Attachment B – CPHR Impact Summary on Serious and Irreversible Impact (SAII) Entities

Attachment C – CPHR Review of Flood Risk Management and Surface Water Assessment

ATTACHMENT A: CPHR Review of the of the Response to Submissions Biodiversity Development Assessment Report

Recommendation 1: Amend and finalise some species polygons

Survey results are being collated for the following threatened species:

- Long-nosed Potoroo
- Squirrel Glider
- *Rhodamnia rubescens*
- Parma Wallaby
- Brush-tailed Phascogale
- *Senne acclinis*
- Eastern Pygmy-possum
- Common Planigale
- *Prostanthera cineolifera*

CPHR will review these updated polygons for these species and the updated BDAR prior to project approval.

The species polygons for barking owl, powerful owl, masked owl and sooty owl are to be updated to include all suitable breeding habitat that intersects with the specified breeding habitat buffer. For contiguous vegetation zones, the species polygon should be extended to the boundary of a non-contiguous vegetation zone.

Recommendation 2: Revise the *Rhizanthella slateri* species polygon

The assumed presence species polygon for *Rhizanthella slateri*, is to be revised based on application of the *Remote assessment of biodiversity values – Biodiversity Assessment Method guide.* CPHR will review the updated polygon for this species and the updated BDAR prior to project approval

Recommendation 3: Include areas in species polygons where survey for threatened flora has not occurred

Relevant species include: *Corybas dowlingii*, *Pterostylis chaetophora*, *Pterostylis gibbosa*, *Prasophyllum petilum*, *Velleia perfoliata*, *Zieria involucrata*, *Tetratheca juncea*, *Grammitis stenophylla* and *Olearia cordata.* Species polygons should be updated in accordance with advice provided by CPHR on 12 December 2025.

Recommendation 4: Describe the impact to derived native grassland (DNG) zones in Disturbance Area B to access non-DNG veg zones for clearing

Where scattered trees surrounded by DNG are to be removed in Disturbance Area B describe in the BDAR how clearing of these trees will occur with no impact to surrounding DNG, or identify tracks for machinery access through the DNG to access the trees requiring clearing and update the BDAR, BAM-C and spatial data accordingly.

ATTACHMENT B: Impact Summary for species that need to be considered for Serious and Irreversible Impact (SAII)

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
Regent Honeyeater (*Anthochaera phrygia*)	The Regent Honeyeater is considered under SAII Principles 1 and 2, as the species has experienced >80% population decline and has an extremely small population (<250 mature individuals). The proposed project will directly impact 96.91 ha of Mapped Important Habitat for the species and 536.64 ha of general habitat. The project is unlikely to reduce the Area of Occupancy (AOO) or Extent of Occupancy (EOO) for the species but will contribute to cumulative loss of habitat which is linked to population declines. The project will impact nectar producing feed trees ranked among the highest in regional importance within one of only 4 key breeding areas (KBA), (Hunter Valley KBA), which constitutes habitat critical to the survival of the species. During flowering events the subject land could potentially support the remaining population, acknowledging the species is nomadic, wide-ranging, and would move to other locations once the flower and nectar sources have been used. However, the impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	96.91	The proposed transmission line has been co-located with existing transmission infrastructure to minimise fragmentation of woodland habitat in the Singleton Military Area (SMA) in the Hunter Valley KBA. The BDAR indicates that further avoidance and minimisation may occur through micro-siting, pre-clearance surveys and maintaining no-go zones during the breeding period.
Large-eared Pied Bat (*Chalinolobus dwyeri*)	The Large-eared Pied Bat is considered under SAII Principle 4 as the caves, cliffs and escarpments used by this species for breeding cannot be offset (i.e. readily re-created or existing caves enhanced). The proposed project will impact 5.25 ha of known breeding habitat and 2.55 ha of assumed breeding habitat for the Large-eared Pied Bat. An additional 574.24 ha of foraging habitat will also be impacted. The project will not directly impact any caves identified as Large-eared Pied Bat breeding habitat. The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	7.8	The proposed project avoids direct impacts to any caves identified as Large-eared Pied Bat breeding habitat. The construction of the project may result in temporary increased indirect impacts to cave structures, including increased noise and vibrations. To minimise indirect impacts, ecologists will conduct assessments in areas within 100m of breeding habitat prior to any construction or clearing activity commencing. Mitigation measures identified in the BDAR include potentially halting activity during the breeding season or employing alternative clearing equipment. A microbat sub-plan will be prepared and implemented during construction as part of the Biodiversity Management Plan and the monitoring outcomes of microbat occupation and activity will be provided.

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
Hunter Valley Delma (*Delma vescolineata*)	The Hunter Valley Delma has been nominated for inclusion on the department's list of species at risk of SAII. This nomination is currently under review. The species is known to occur almost entirely in the Hunter Valley, with an additional outlying record from the Liverpool Plains. The AOO for this species is estimated at 48 km^2 and the EOO is estimated at 1,825 km^2. The proposed project will remove 281.36 ha of suitable habitat and an additional 72.17 ha of habitat in Disturbance Area B will be subject to partial impacts. This species occurs in secondary native grassland remaining after the removal or dieback of previous woody canopy vegetation in association with sparse box-gum woodland and heavily disturbed agricultural land (NSW Threatened Species Scientific Committee Final Determination 2024[1]). The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	72.17	281.36	Areas of retained suitable habitat adjoining the proposed impact areas will be delineated and protected. Unexpected and incidental finds protocol, as detailed in the BDAR, will be enacted if the species is recorded in pre-clearing surveys.
Broken Back Ironbark (*Eucalyptus fracta*)	The Broken Back Ironbark is considered under SAII Principle 3 as the species has a limited geographic distribution (i.e EOO 233 km2 and AOO 52 km2). A total of 13.1 ha of habitat will be removed, of which 4.62 ha is habitat where the species has been recorded and 8.48 ha where presence has been assumed to be present. A total of 66 individuals will be removed from a total population estimated to contain 3,539–3,639 individuals across three subpopulations. The Broken Back Range subpopulation is currently estimated to have at least 3,039–3,139 plants. The impact is unlikely to alter the current extent of occurrence or area of occupancy. The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	13.1	Areas adjoining the proposed impact in which the species has been recorded will be retained, delineated and protected. Possible micro-siting will occur within proposed impact areas to avoid impacts on mapped threatened species. Unexpected and incidental finds protocol, as detailed in the BDAR, will be enacted if the species is recorded in pre-clearing surveys. Biosecurity protocols included in the BDAR will help limit the spread of weeds, *Phytophthora cinnamomi* and myrtle rust.

[1] NSW Threatened Species Scientific Committee (2024). Notice of and reasons for the Final Determination- Hunter Valley delma *Delma vescolineata* Endangered Species Listing.

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
Charmhaven Midge Orchid (*Genoplesium branwhiteorum*)	The Charmhaven Midge Orchid is considered under SAII Principle 1 and Principle 3 as there is evidence of a rapid rate of decline and a very limited geographic distribution. The species has undergone a reduction in numbers because of land use changes such as clearing of native vegetation unrelated to this project. The species was not recorded during survey, however the species has been assumed to be present over an area of 6.12 ha which was not surveyed. The current extent of occurrence is estimated to be 76.2 km^2 and its area of occupancy is 40 km^2 based on all documented records (Renner 2022[2]). The number of individuals to be impacted by the project is uncertain but likely to be low. Given this, the impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	6.12	Areas of retained suitable habitat adjoining the proposed impact areas will be retained, delineated and protected. Unexpected and incidental finds protocol, as detailed in the BDAR, will be enacted if the species is recorded in pre-clearing surveys. Biosecurity protocols included in the BDAR will help limit the spread of weeds.
Variable Midge Orchid (*Genoplesium insigne*)	The Variable Midge Orchid is considered under SAII Principle 3 as there is evidence of a very limited geographic distribution (3 extant populations and EOO <100 km^2). Additional populations have since been identified and the EOO was recalculated to 210 km^2 and an AOO of 576 km^2 (Towe 2022[3]). A total of 10.67 ha of habitat will be removed, of which 4.25 ha is habitat where the species was recorded and 6.42 ha where it is assumed to be present due to lack of surveys. A total of 15 individuals will be removed from a total estimated population of 432 individuals across 14 sub-populations (Towe 2022). The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	10.67	As above
Swift Parrot (*Lathamus discolor*)	The Swift Parrot is considered under SAII Principle 1, having undergone a population decline >80% over three generations. The project would result in the removal of 45.32 ha of Mapped Important Habitat and a further 743.75 ha of general habitat. For the species overall, more than 70% of its wintering habitat has been cleared, with ongoing losses of approximately 40 ha per year in the Hunter–Central Coast region (Crates *et al*., 2025[4]) unrelated to this project. While the subject land has the capacity to support at least 25% of the species population during winter when seasonal resources are available, there are large areas of similar habitat surrounding the development footprint. The	-	45.32	The proposed transmission line has been co-located with existing transmission infrastructure to minimise fragmentation of woodland habitat in the Singleton Military Area which has been identified as a Key Biodiversity Area for the species.

[2] Renner, M. (2022). Two new species of *Genoplesium* R.Br. sensu lato (Orchidaceae: Prasophyllinae) from the Central Coast of New South Wales. Telopea, 25, 285–299. doi: https://doi.org/10.7751/telopea15648

[3] Towe, Brian. (2022). Reproductive success and rarity of the variable midge orchid *Genoplesium insigne*. *Cunninghamia*.

[4] Crates, R., Ruser, N. & Heinsohn, R. (2025). Quantifying past and predicting future cumulative loss of habitat for a critically endangered nomadic bird. Austral Ecology, 50(2). https://doi.org/10.1111/aec.70030

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
	project will impact part of the Singleton Military Area, that is important habitat and has supported Swift Parrots over multiple years, including large aggregations of up to 200 individuals (2015–2020), demonstrating the importance of these areas. The project is unlikely to reduce the Area of Occupancy (AOO) or Extent of Occupancy (EOO), however cumulative losses are of particular concern given the species' small population size and dependence on ephemeral foraging resources. The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.			
Littlejohns Tree Frog (*Litoria littlejohni*)	Littlejohns Tree Frog has been nominated for inclusion on the Department's list of species at risk of SAII. This nomination is currently under review. The species is susceptible to infection by amphibian chytrid causing the disease chytridiomycosis. The species will be considered under SAII Principle 4. This species is also known from only three locations and has declined historically, now persisting in three regions: the Central Coast Range (Watagan Mountains), Blue Mountains, and Woronora Plateau (NSWSC 2022[5]; Stock *et al*. (2023)[6]. The population estimates in the BDAR are between 659 -1318 mature individuals across NSW, with a genetic (effective) population size of 340 individuals (Stock *et al*. 2023). The project will impact 70.34 ha of habitat for this species, which represents 6% of the estimated suitable habitat available to the Watagans' population. The BDAR estimates direct mortality of up to 15 mature individuals based on the proportion of habitat lost and a minimum population estimate of 250 mature individuals for the Watagan Mountains (WSP 2026). This is not likely to contribute significantly to the risk of the species becoming extinct, however DPHI should carefully consider this species, and CPHR can provide further information should it be required.	-	70.34	Impacts proposed by the project to core breeding habitats have been reduced by 9.29 ha through design amendments, resulting in the retention of 9 non-disturbance areas where the alignment crosses key breeding habitat in waterways and the removal of a stringing site. The project has also avoided 60 of 62 artificial breeding ponds constructed by the University of Newcastle for this species. During construction, sensitive hand clearing zones will be established for waterways where clearing is required, and an amphibian hygiene protocol will be implemented as part of the Biodiversity Management Plan to mitigate potential spread of chytrid fungus during construction. EnergyCo have also proposed $250,000 of funding to target activities under the conservation strategy for the species.
Stuttering Frog (*Mixophyes balbus*)	The Stuttering Frog is considered under SAII Principle 4, as the ability to control the key threatening process 'Infection of frogs by amphibian chytrid causing the disease chytridiomycosis' is negligible at the site scale. Recent taxonomic work has proposed splitting the species into two species, however this is yet to be recognised under the *Biodiversity Conservation Act 2016.*		191.99	Impacts to core breeding habitats have been reduced by 8.69 ha through design amendments resulting in the retention of 9 non-disturbance areas where the alignment crosses key breeding habitat in waterways and the removal of a stringing site. During construction, sensitive hand clearing zones will be

[5] NSW Threatened Species Scientific Committee (2022). Final Determination: Littlejohn's Tree Frog *Litoria littlejohni* listed as an Endangered Species. NSW Department of Planning and Environment, Sydney. Available at: https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2022/littlejohns-tree-frog-litoria-littlejohni (Accessed: 3 March 2026)

[6] Stock, S.E., Klop-Toker, K., Wallace, S., Kelly, O., Callen, A., Seeto, R., Mahony, S.V., Hayward, M.W. & Mahony, M.J. (2023). Uncovering inbreeding, small populations, and strong genetic isolation in an Australian threatened frog, *Litoria littlejohni*. *Conservation Genetics*, 24, pp. 575–588. https://doi.org/10.1007/s10592-023-01522-5

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
	This species has declined historically, with the declines concentrated to the southern population which occurs from the Hunter River, south to Victoria, noting it has not been seen in Victoria for the past two decades (Mahoney *et al*., 2023[7]). The southern subpopulation is now largely concentrated between Gosford and the Watagan Mountains, as the historical distribution south of Sydney has heavily declined due to occurrence mostly within cool, moist habitats that favour chytrid persistence and transmission. The project will impact 191.99 ha of habitat for this species. Most of the records within the development footprint are located between towers 1 to 10 (WSP 2026). It is likely that there will be a loss of some individuals through mortality due to direct and indirect impacts. The BDAR identifies the extent of impacts proposed will affect 5% of the associated habitat available in the study area for the estimated population in the Watagan Mountains of 50 to 250 individuals. This is not likely to contribute significantly to the risk of the species becoming extinct, however DPHI should carefully consider this species, and CPHR can provide further information should it be required.			established for waterways where clearing is required. An amphibian hygiene protocol will also be implemented as part of the Biodiversity Management Plan to mitigate potential spread of chytrid fungus during construction. EnergyCo have also proposed $250,000 of funding to target activities under the conservation strategy for the species.
Brush-tailed Rock-wallaby (*Petrogale pencillata*)	The Brush-tailed Rock-wallaby is considered under SAII Principle 4 as the caves, cliffs and escarpments used by this species for habitat cannot be offset (i.e. readily re-created or existing caves enhanced). The proposed project will impact 114.84 ha of known Brush-tailed Rock-wallaby habitat in Disturbance Area A and 49.12 ha of known habitat will be partially impacted in Disturbance Area B and Disturbance Area Hazard tree Zone. Most direct impacts to caves and dens have been avoided, however some disturbance areas are located above, or adjoining, cave structures which are used by the species. The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	49.12	114.84	Direct impacts to caves with significant habitat for the Brush-tailed Rock Wallaby colony in the Pokolbin and Watagan State Forests have been avoided. The construction of the project may result in temporary increased indirect impacts to cave structures, including increased noise and vibrations. A terrestrial mammal sub-plan will be prepared.
Eastern Underground Orchid (*Rhizanthella slateri*)	The Eastern Underground Orchid is considered under SAII Principle 2 as it has a small population size, known from fewer than 14 subpopulations, each containing only a few individuals up to a maximum of about 75. It grows almost entirely below the soil surface, and flowers occasionally (above ground). Despite its small population size, its EOO is ~17,050 km² and occurs from Nowra to Bulahdelah. The species was assumed present in 81.37ha of suitable habitat, although this currently being revised and it is expected to reduce this to 4.27 ha of habitat	-	4.27	Areas of retained suitable habitat adjoining the proposed impact areas will be delineated and protected. The unexpected and incidental finds protocol, as detailed in the BDAR, will be enacted if the species is recorded in pre-clearing surveys. Biosecurity protocols included in the BDAR will help limit the spread of weeds and plant pathogens.

[7] Mahony, M.J., Bertozzi, T., Guzinski, J., Hines, H.B. and Donnellan, S.C. (2023) *A new species of barred frog, Mixophyes (Anura: Myobatrachidae) from southeastern Australia identified by molecular genetic analyses*. **Zootaxa**, 5297(3), pp. 301–336. https://doi.org/10.11646/zootaxa.5297.3.

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
	where it is assumed to be present. The number of individuals likely to be impacted is uncertain as targeted survey was not undertaken in these areas. However given its broad distribution and the small area of assumed presence habitat, the impact of this project is considered not likely to contribute significantly to the risk of the species becoming extinct.			
Scrub Turpentine (*Rhodamnia rubescens*)	The Scrub Turpentine is considered under SAII Principles 1 and 4 as the population in NSW has already undergone, or is projected to undergo, a ≥80% decline within 10 years or three generations due to myrtle rust infection (*Austropuccina psidii*). Rapid decline is occurring across the species' entire range, and all individuals recorded in the subject land show signs of infection. Over the next three generations (30–40 years), the species is projected to decline by 96–99%, based on documented mortality rates. It is still known to flower and set seed but seedling recruitment is being impacted by myrtle rust. A very small number of infected individuals have been observed since the RTS-BDAR was lodged. The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	85.64 (1528 count)	Areas containing the species adjoining the proposed impact areas will be retained, delineated and protected. Possible micro-siting will occur within proposed impact areas to avoid threatened species. The unexpected and incidental finds protocol, as detailed in the BDAR, will be enacted if the species is recorded in pre-clearing surveys. Biosecurity protocols included in the BDAR will help limit the spread of weeds, *Phytophthora cinnamomi* and myrtle rust.
Native Guava (*Rhodomyrtus psidioides*)	The Native Guava population is considered under SAII Principles 1 and 4 as the NSW population has already undergone, or is projected to undergo, a ≥80% decline within 10 years or three generations due to severe myrtle rust infection. A 57% mortality across the species range, because of myrtle rust, has been documented over 3–3.5 years. The species is known to flower and set seed but seedling recruitment is impacted by myrtle rust. A species polygon of 17.87 ha has been identified with 1.8 ha of recorded habitat (4 individuals) and 16.07 ha where the species is assumed to be present. The impact of this project is not likely to contribute significantly to the risk of the species becoming extinct.	-	17.87	As above
Wyong Sun Orchid (*Thelymitra adorata*)	The Wyong Sun Orchid is considered under SAII Principles 2 and 3 the species has a small population size and limited geographic range (i.e. EOO 5 km^2 and AOO <4 $km^{2)}$. Monitoring of extant populations recorded approximately 50–200 individuals (Saving our Species Monitoring 2022–23). In 2013, both the extent of occurrence and area of occupancy were estimated to be <10 km^2, based on fewer than 50 flowering plants recorded across five locations on public and private land (Branwhite, pers. comm., 2013). This project would impact 0.79 ha of habitat where the species is assumed to be present. If present, the number of individuals occurring in this location is uncertain due to the lack of targeted survey. The species was not detected elsewhere on the subject land. Given this, it is not expected that this project is likely to contribute significantly to the risk of the species becoming extinct.	-	0.79	Areas of retained suitable habitat adjoining the proposed impact areas will be retained, delineated and protected. The unexpected and incidental finds protocol, as detailed in the BDAR, will be enacted if the species is recorded in pre-clearing surveys. Biosecurity protocols included in the BDAR will help limit the spread of weeds and plant pathogens.

SAII entity	Overview	Area of impact (ha)		Proposed minimisation and mitigation measures
		Partial loss	Total loss	
Sooty Owl (*Tyto tenebricosa*)	The Sooty Owl is considered under SAII Principle 4 as the caves, cliffs and escarpments used as breeding site cannot be offset (i.e. readily re-created or existing caves enhanced). The proposed project will impact 293.43 ha of Sooty Owl habitat, however there will be no direct impacts to the cave breeding habitat observed in Corrabare State Forest. Given the project is not impacting irreplaceable cave breeding sites for this species, the impact of this project is not likely to contribute significantly to the risk of the species becoming extinct under SAII Principle 4.	-	293.43	Direct impacts to the Sooty Owl breeding site in a cave in Corrabare State Forest have been avoided. The construction of the project may result in temporary increased indirect impacts to cave structures, including increased noise and vibrations. The BDAR indicates impact minimisation will occur through installation of bird diverters, and implementation of unexpected and incidental finds protocol if the species is recorded.

ATTACHMENT C: CPHR Review of Flood Risk Management and Surface Water Assessment

- Recommendations 15 and 16 from CPHR's EIS response have been addressed.
- The Amendment Report acknowledges flood risks to ancillary sites and access tracks and indicates that detailed construction planning will consider flood risk and mitigation measures (FL1). However, the response does not explicitly commit to preparing site-specific flood management plans for construction sites and access tracks located on flood-affected land.
- DCCEEW recommends that detailed flood management plans be prepared during detailed design for sites and access tracks within flood-affected areas.