



Draft review of environmental factors: Mobile Spot Program Round 5A – Wattamolla



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1. Brief description of the proposal

Proposal name and brief description	The Federal Government's Mobile Black Spot Program Round 5A has identified a need to improve mobile phone service to Wattamolla. The proposal will consist of installing a Telstra 20m monopole, 1 x omni antenna on top of the monopole (overall height 21.8m), 12m x 10m compound area, 2 x oneweb satellite antennas at the base of the monopole, 15 x solar panels to power the site and ancillary equipment.
Location of activity	Latitude: -34.13841 Longitude: 151.11532
Name of NPWS park or reserve	Royal National Park.
Description of any unreserved land	N/A
NPWS Area	Wattamolla Waterfall, Royal National Park.
Council	Sutherland Shire Council
NSW State electorate	Not available
Estimate capital cost of project*	TBC
Estimated duration of project	Approximately 3 weeks
Proposed commencement date	June 2024 (pending approvals)
Proposed completion date	June 2024 (site on air forecast)

Figure 1 **Location of the activity**



Proponent's details

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Position	Senior Town Planner
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Proponent external to NPWS or DPE Environment and Heritage Group (EHG)

Organisation	Telstra Limited c/: Downer EDI Engineering Pty Limited
ACN/ABN	ACN 086 174 781 c/: ABN 66 057 593 503

NPWS proponents

Area Manager or Unit Manager	N/A
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2. Permissibility and assessment pathway

2.1 Permissibility under NSW legislation

The following sections outline how the activity is permissible under applicable NSW legislation.

2.1.1 National Parks and Wildlife Act 1974 (NPW Act)

On land reserved and acquired under the NPW Act

The proposed works are in compliance with s.2A of the Act ensuring the conservation of nature including habitat, biological biodiversity, landforms of significance, landscapes and natural features of significance. The proposed location was selected by Parks as the best location that will service Wattamolla and ensuring conservation to the Park. The current location will be cleared of existing vegetation by Parks and it is understood this vegetation is not of significance.

The proposed works will be in accordance with the principals under s.30E-30K ensuring the protection of National parks, Historic sites, State conservation areas, Regional parks, Karst reserves, nature reserves and Aboriginal areas.

The development falls within the Audley Masterplan, Royal National Park. The Royal National Park, Heathcote National Park and Garawarra State Recreation Area Plan of Management (2000) lists 13 management objectives specific to Royal National Park six of which apply to Audley:

- promote natural and cultural heritage conservation, the work of the Service, and environmental education;
- protect the catchment of the Hacking River;
- conserve the historic recreational settings and cultural landscapes;
- increase public awareness of the history and development of RNP in respect to changes in the philosophy of recreation and conservation management;
- encourage the appropriate use of the park;
- provide outdoor recreation opportunities at existing levels within the established facility areas.

The development supports the above objectives through providing adequate mobile phone coverage to support recreational activities and first response for emergency services. Protection of the existing environment will be maintained and minimal ground disturbance will occur. Therefore, the proposed development will comply with the objectives outlined in the Masterplan.

Assets of intergenerational significance

The site is outside of any current AIS declarations.

Leasing, licensing and easement provisions

NA

2.1.2 Wilderness Act 1987 (for activities in wilderness areas)

NA

2.1.3 Biodiversity Conservation Act 2016 (BC Act)

The development will be consistent with the biodiversity conservation objectives as Park will clear existing vegetation and the works will not impact any undisturbed land. The works will not be within an EEC being an existing developed area.

2.1.4 NSW Reconstruction Authority Act 2022 (NSW RA Act)

The development will have regard to a State disaster mitigation plan where available.

2.1.5 Rural Fires Act 1997 (RF Act)

The development will provide the Wattamolla area with much needed mobile service to contact emergency services during an event (fire). The area surrounding will be maintained for ancillary equipment, further APZ can be implemented if required to ensure the protection of the facility during a fire event.

2.2 Environmental Planning and Assessment Act 1979

2.2.1 Assessment pathway

The works are occurring under the Infrastructure SEPP as the Federal telecommunications low impact schedule does not apply due to location in an Environmentally Sensitive area. The works will be conducted under clause 114 of the ISEPP (Development Permitted without {Planning} consent). The NPWS Environmental Impact Assessment (EIA) requirement for Development Permitted without consent is a REF (which has been submitted) under clause 5.5 of the Environmental Planning and Assessment Act (Duty to consider environmental impact).

2.2.2 Strategic plans

The development is within the Wattamolla Visitor Precinct of the Royal National Park. Upgrades to assist in the increasing use of the natural environment follow the master plan in ensuring the enhancement of the precinct. The proposed development will help support the upgrades to the precinct through providing connectivity for tourism and safety to the area.

2.3 Other relevant NSW legislation

2.3.1 Coal Mine Subsidence Compensation Act 2017

The activity is not taking place in a mine subsidence district.

2.3.2 Fisheries Management Act 1994

The activity will not require notification or approval under the Fisheries Management Act.

2.3.3 Heritage Act 1977

The development not on a listed State Heritage Register (SHR).

2.3.4 Marine Estate Management Act 2014

The activity is not within or affect a marine park or aquatic reserve.

2.4 Commonwealth legislation

2.4.1 Environment Protection and Biodiversity Conservation Act 1999

The activity is within a National Heritage Place – Royal National Park and Garawarra Station Conservation Area listed place and Protected Area under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Given the proposal is within an existing developed area, the activity will not impact any EPBC listed species and no other MNES impacts will occur.

2.4.2 Native Title Act 1993

The activity is identified within Native Title Application NC2017/003. There is no Determination or Land Use Agreement at this location. Being within an existing developed area, the activity is considered not to affect native title and it would not restrict Aboriginal people from practising their culture on the park.

2.4.3 Telecommunications Act 1998

Telstra, as a licensed telecommunications carrier, must operate under the provisions of the Telecommunications Act 1997 and the Telecommunications Code of Practice 1997. In some instances, the 1997 Act exempts carriers from the requirements of State and Territory planning legislation when the proposed facility is compliant with the Telecommunications (Low Impact Facilities) Determination 2018 (Determination). In this instance the proposal is not compliant with the Determination being located within an area of environmental significance (National Park) and therefore requires consent from the National Park.

2.5 Summary of licences and approvals

2.5.1 Approval under the National Parks and Wildlife Act

The development seeks approval under NPW Act s 153D, Leases, licences and easements for telco facilities.

2.5.2 Other approvals

Not required.

2.5.3 Publication triggers

Triggers for publication of the Review of Environmental Factors

Permit or approval	Applicable?
Fisheries Management Act, sections 144, 200, 205 or 219	No
Heritage Act, section 57 (commonly known as a section 60)	No
National Parks and Wildlife Act, section 90 (AHIP)	No
Protection of the Environment Operations Act 1997, sections 47–49 or 122	No

REF does not need to be published.

3. Consultation – general

Consultation with National Parks and other stakeholder recommended by National Parks to ensure permissibility of this REF.

3.1 Statutory consultation

The Transport and Infrastructure SEPP requires consultation with relevant authorities as identified in the following table.

Consultation triggers under the Transport and Infrastructure SEPP

Authority (TISEPP section)	Trigger	Applicable to proposal?
Consultation with local council (s 2.10)	Development with impacts on council infrastructure or services (such as stormwater, sewer, water, roads and footpaths)	No
Consultation with local council (s 2.11)	Development with impacts on heritage items listed under the local environmental plan (LEP)	No
Consultation with local council (s 2.12)	Development that will change flood patterns on flood-labile land	No
Consultation with State Emergency Service (s 2.13)	Development on flood-labile land	No
Consultation with local council (s 2.14)	Development that is inconsistent with a certified coastal management program affecting land within the mapped coastal vulnerability area.	No
Consultation with NPWS (s 2.15(2)(a))	Development adjacent to land reserved or acquired under the NPW Act	No
Consultation with NPWS (s 2.15(2)(b))	Development on land in Zone C1 that is yet to be reserved under the NPW Act	No
Consultation with Transport for NSW (s 2.15(2)(c))	Development comprising a fixed or floating structure in or over navigable waters	No

Authority (TISEPP section)	Trigger	Applicable to proposal?
Consultation with the Director of the Siding Spring Observatory (s 2.15(2)(d))	Development that may increase the amount of artificial light in the night sky and that is on land within the mapped dark sky region	No
Consultation with the Cth Department of Defence (s 2.15(2)(e))	Development located within the buffer around the defence communications facility near Morundah as mapped under the Lockhart, Narrandera or Urana LEPs	No
Consultation with the Subsidence Advisory NSW (s 2.15(2)(f))	Development on land in a mine subsidence district.	No
Consultation with the Willandra Lakes Region World Heritage Advisory Committee and Heritage NSW (s 2.15(2)(g))	Development on, or reasonably likely to have an impact on, a part of the Willandra Lakes Region World Heritage Property	No
Consultation with the Western Parkland City Authority (s 2.15(2)(h))	Development within a Western City operational area (Western Parkland City Authority Act 2018, Schedule 2) with a capital investment value of \$30 million or more	No
Consultation with Transport for NSW (s 2.221)	Traffic-generating development listed in Schedule 3	No

Details of required consultation

Consultation with Sutherland Shire Council and community in accordance with Section 5.2 of the *Mobile Phone Base Station Deployment Code 2020 (Code)*. This includes a letter emailed to council detailing the proposal with the opportunity for council to provide any feedback or comments. A site notice will also be organised with Parks onsite rangers, the notice is generally displayed on a notice board or main reception area where visitors of the park can view it. The notification period will be 10 business days in accordance with the Code.

3.2 Targeted consultation

3.1.1 Adjacent landowners

Not applicable.

3.1.2 Wider community consultation and/or notification of works

Not applicable.

3.1.3 Interest groups and/or notification

None identified.

4. Consultation – Aboriginal communities

4.1 Native title notification requirements

1. Is the land subject to an Indigenous land use agreement (ILUA)? No

If relevant, provide details of the ILUA, its procedures and how these requirements have been completed.

2. Has native title been **extinguished**? No or unclear
3. Has there been a determination of native title applicable to the land or is there a native title claim pending (check the National Native Title Tribunal website)? No
4. If native title is not confirmed as extinguished, is the activity occurring on land reserved as park on or before 23 December 1996 **and** is an act in accordance with the purpose of reservation **and**
 - a. is either a 'public work' as per subdivision 24J of the Native Title Act (e.g. a building or other structure that is fixed to the landscape, a road or bridge, a well or a bore, or involves major earthworks, carried out by a public authority)
or
 - b. involves the grant of a lease or easement?

No

5. If native title is not confirmed as extinguished and the circumstances of Question 4 do not otherwise apply, is the activity either:
 - a. a facility for service to the public (as defined in subdivision 24K of the Native Title Act)
or
 - b. a low-level activity (as defined in subdivision 24L of the Native Title Act)?

Yes

The notification requirements under the Native Title Act do not apply.

4.2 Parks under other joint management arrangements

Is the park's management subject to another joint management arrangement such as a memorandum of understanding? No

5. Proposed activity (or activities)

5.1 Location of activity

Description of location	Proposed location behind public toilets and water tanks buffered by existing vegetation and located within the utilities/facilities area.
Site commonly known as If applicable	n/a
Park name Lands reserved under NPW Act	Wattamolla Falls, Royal National Park.
Other tenures Include lands acquired under Part 11 of the NPW Act	n/a
Lot/DP If available	Lot 20/-/DP752018
Street address If available	326 Wattamolla Road, Wattamolla NSW 2232
Site reference	-34.13841, 151.11532.

5.2 Description of the proposed activity

The proposal will install one Telstra 20m monopole, 1 x omni antenna on top of the monopole (overall height 21.8m), 12m x 10m compound area, 2 x oneweb satellite antennas at the base of the monopole, 15 x solar panels to power the site and ancillary equipment. See proposed plans attached with this REF.

5.2.1 The proposed activity: pre-construction, construction, operation and remediation

Road/vehicular access including proximity to major state roads	Access is provided to site by the existing access track off Wattamolla Road.
Surrounding land use and landscape (include vegetation type, waterways, topography)	The proposed site is located within the Royal National Park, Wattamolla Waterfall visitor area. Work area will be cleared by Parks. The closest waterway is Cootie Creek approximately 80m north of the site. The site is surrounded by dense vegetation, ocean inlet into the river and cliff coastal line. The vegetation type surrounding is considered mature and is mapped as environmentally important.
Size of proposed activity footprint and description of proposal location within or adjacent the existing compound	The proposed activity footprint will be located within the 12m x 10m work area. All works and minor ground disturbance will be within this area. A temporary 'works area' on the site would be required to store construction equipment. The

	<p>equipment will include trucks, work utes, EWP and/or small crane. The equipment will be stored in the works area temporarily for 3-4 days.</p> <p>The removal of weeds/grasses within the work areas will be whipper sniped/mowed to create visibility and a safe area for the proposed works. Bog mats will be laid down for delivery trucks and the crane to ensure minimal damage to the existing ground.</p>
<p>Proposed construction method, including area and depth of proposed earthworks, scaffolding, footings etc... and details of method to install the tower (i.e. scaffolding, riggers or crane)</p>	<p>The proposal would require minor excavation of the ground surface for the pad footing to support Monopole, 2x One-Web antenna mounts, and cabinet, Solar panels will be on concrete footing. Fence will be around the site to restrict access.</p> <p>The excavation for the concrete footings would be at a depth of about 100mm simply to level and clear the earth under the footing. Minor excavation for fence, conduits for earthing electrical feeders.</p> <p>Excavated soil removed from site. These works would be minor and would not create erosion and sediment control issues post construction. Further mitigation measures can be utilised if required.</p> <p>The installation of the footing would be undertaken using a crane set-up in the proposed area within the temporary works area. There is sufficient cleared space for the set-up of this equipment.</p>
<p>Materials and equipment proposed to be used for the proposal</p>	<p>Materials to be used on site would include:</p> <ul style="list-style-type: none"> • Equipment cabinet • Satellite antennas • Antenna • Racks / Cabinets • Cables • Cable tray • 50mm & 100mm PVC Conduits • Batteries • Excavation & pour onsite, concrete plant 40min away <p>Construction equipment and plant that are likely to be used during construction of the proposal may include but are not limited to:</p> <ul style="list-style-type: none"> • Concrete truck • Truck mounted EWP • 1 x crane • 2 x Flatbed Trucks with Hyab for delivery of skids and equipment • Skip bin • 2.5-5 tonne Excavator • Chain block

	<ul style="list-style-type: none"> • Utility vehicles • Portable amenities • Underground asset locating device
Receipt, storage and on-site management for materials and equipment including number of trucks and other vehicles accessing the site	<p>Materials, including the equipment cabinet, satellite antennas, antenna, racks, radio equipment and ancillary equipment would be delivered to site on trucks and stored within the temporary 'works area'.</p> <p>All excavated soil would be re-used for back-fill or removed from site within the work area.</p>
Site clearing including extent of vegetation to be removed (ie. for an Asset Protection Zone)	<p>No vegetation clearing is proposed to be undertaken other than trimming overgrown weeds/grasses with a whipper snipper or mower to create visibility, as mentioned above.</p>
Solar power requirements/power supply	<p>Solar is proposed to power this site.</p>
Public utility adjustments	<p>All services required for the ongoing operation of the proposal are capable of being provided without impacting on the supply or reliability of these services to any existing consumers in the locality.</p> <p>No stormwater, sewerage or waste management facilities are required.</p>
Any adjustment or earthworks required for access roads or traffic	<p>The existing access track is proposed to be used for both construction and maintenance. This track is suitable for these activities and no upgrade is required.</p>
Storage and disposal of waste material	<p>All waste materials would be stored within the construction area. Excess material such as equipment packaging and rubbish would be disposed of, at an appropriately licensed facility.</p>
Description of ancillary activities, for example, a 'works area', signage, generators etc.	<p>During construction, a temporary 'works area' would be required and will require provision for:</p> <ul style="list-style-type: none"> • Crane set-up • Vehicle parking. • Equipment and plant set down area. • Materials unloading and storage. • Exclusion zones for working at heights. • Temporary work site fencing.
Timeframe, duration, construction hours of operation, workforce	<p>Construction is anticipated to take approximately 2-3 weeks to complete, commencing 2024 should no unforeseen issues arise.</p> <p>Construction of the activity would occur within the following workhours:</p> <ul style="list-style-type: none"> • Monday to Friday: 7am to 6pm. • Saturday: 8am to 1pm. <p>No works would be carried out on Sundays, public holidays or outside standard working hours (unless the impacts of the activity are assessed as minor or inconsequential and approval is obtained by the Delivery Contractor from the Authority).</p>

	<p>The amenity of the vehicles and equipment sitting outside the proposed area within the temporary works area will not be significantly impacted. The works area is temporary necessary for the construction of the upgrade with an estimated total time of 5-7 days. The vehicles and equipment as noted above will not peak above the tree line so public views from adjoining properties and roads will not be impact at any time.</p> <p>All equipment left overnight will be locked within the existing compound area. Should any vehicle remain on site overnight, they will be bunted off with bollards and flagging. This storage method will ensure the safety of any visitors to the site while unattended during the construction period. The storing of vehicles and equipment for this short period of time (1 week) will not impact the amenity of the site when viewed from the access road and adjoining roads and properties.</p>
<p>Demobilisation works</p>	<p>Once the construction is complete the demobilisation would include removing equipment, machinery and waste materials. The site would be left in a clean and tidy condition. No disturbance to the surrounding area is anticipated when demobilising the site.</p>

6. Reasons for the activity and consideration of alternatives

6.1 Objectives and reasons for the proposal

The Federal Government's Mobile Black Spot Program has identified a need to improve mobile phone service to Wattamolla.

This program will deliver mobile coverage to a large number of regional and remote communities who, for the first time, will be able to access fast mobile voice and data services. The improved coverage is increasing access to new technologies for key regional sectors like agriculture, transport, mining and tourism – technologies which rely on a fast, reliable and affordable mobile network.

The Mobile Black Spot Program builds upon significant investments already undertaken by Telstra to expand and upgrade our mobile network.

Telstra's partnership with the Federal Government will involve Telstra investing up to \$290 million of their own funds to build over 880 new sites under all rounds of the Mobile Black Spot Program. This is over and above the billions of dollars Telstra have spent on our mobile network in recent years.

Telstra have worked with State and Local Governments, to attract tens of millions of dollars in additional targeted funding. This means we're able to deliver a combined investment of over \$640 million for regional telecommunications under the program.

Telstra is committed to providing improved mobile coverage to regional and remote Australia. In the five years to end June 2020, Telstra invested \$7.5bn in our mobile network nationally with \$3bn of that invested in regional areas alone.

In addition to the Mobile Black Spot Program, Telstra has also delivered over 200 small cells in selected areas where appropriate infrastructure is available, which will bring high speed 4G data services to small country towns.

Telstra continues to invest significantly in maintaining and expanding our mobile network across Australia.

By way of a background:

Mobile phones and mobile broadband devices continue to play an important role in the lives of Australians. This includes providing the fundamental ability to be in contact with family and friends, operating businesses more efficiently and effectively as well as dialing triple 0 during a natural disaster or other emergency.

Because of the ever-growing demand for more data and better reception, mobile phone carriers such as Telstra continually have to upgrade and expand mobile phone networks to eliminate coverage black spots and to keep up with the demands and expectations placed upon them by the community.

6.2 Consideration of alternatives

The initial investigation eliminated new site locations through consultation with National Parks. Advice from Parks and a site investigation identified the proposed location as the best location for a new Telstra small cell. Alternate locations within the immediate Wattamolla Waterfall area may impede on the use and/or function of the area. Locating within the main entrance and park area off Wattamolla Road could impact on amenity and the area is not prescribed for utility type uses. The existing carpark does not provide sufficient space without the loss of required car spaces and access. Off-park locations are not preferred as the small cell solution would not provide adequate coverage to the desired location due to distance.

6.3 Justification for preferred option

The proposed location is the preferred option being located within existing utility area including public toilets and water tank facilities. The location is also hidden away amongst existing vegetation protecting the existing amenity of the Park. The location provides existing access within the existing developed area, removing the need to disturb new land. Furthermore, the preferred option is located close enough to the visitor area in ensure mobile coverage is achieved.

6.4 Site suitability

Site character	Developed area within existing utilities/facilities area of visitor park.
Landscape context	Already disturbed
Application of site suitability matrix	n/a
Strategic site assessment (if required by the matrix)	n/a

7. Description of the existing environment

7.1 Overview of the project area

The development is within the Royal National Park, Wattamolla Waterfall. The existing environment is made up of mature dense vegetation, ocean inlet into the river and cliff coastal line. The immediate area surrounding the site provides existing access paths and pre-disturbed space for the proposed development. The development will be adequately separated from any significant environment.

7.2 Natural values

7.2.1 Geology, geomorphology, Soils and topography

The existing ground has not been investigated to a depth as the development will only require minimal land levelling to make it flat. No depth drilling or anchoring is required. As the development is only leveling the ground and utilising an existing developed area, no further in-depth investigation is required. The topography of the site is generally flat, given the small scale in area, major cut and fill is not required.

There are existing waterways within the area. The development is situated adequately to ensure the protection of the existing waterways. No major works are proposed that could impact any waterway or catchment.

7.2.2 Biodiversity

Overview of terrestrial and aquatic biodiversity

Discussions with Park rangers identify the proposed location as non-significant vegetation and removal of this vegetation would not need further consent. A full ecological assessment is not required.

7.3 Cultural values

7.3.1 Aboriginal cultural heritage

A search of Heritage NSW AHIMS (Aboriginal Heritage Information Management System) has shown 5 Aboriginal sites within a 200m buffer of the site. Both locations close to the site are within vegetated areas not within close proximity to the proposed location. As the development will be located within an existing developed area and will utilise the existing access track, no new ground disturbance is proposed. Therefore, it is unlikely that the proposal will have any impact on these Aboriginal places. Furthermore, any existing agreement or advice from Parks in regards to the Aboriginal places, can be applied to this development or otherwise advised. AHIMS search report attached with this REF.

7.4 Social values

7.4.1 Recreation values

As mentioned in section 6.1, Mobile phones and mobile broadband devices continue to play an important role in the lives of Australians. This includes providing the fundamental ability to be in contact with family and friends, operating businesses more efficiently and effectively as well as

dialling triple 0 during a natural disaster or other emergency. Because of the ever-growing demand for more data and better reception, mobile phone carriers such as Telstra continually have to upgrade and expand mobile phone networks to eliminate coverage black spots and to keep up with the demands and expectations placed upon them by the community. Connectivity within the Wattamolla area will assist with the current recreational values and support tourism and safety within the area.

7.4.2 Scenic and visually significant areas

The development will not impact any scenic amenity within the area providing adequate separation to sensitive uses.

7.5 Matters of National Environmental Significance

The activity is within a National Heritage Place listed place and Protected Area under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Given the proposal is in an existing developed area and no significant vegetation will be removed, the activity will not impact any EPBC listed species and no other MNES impacts will occur. EPBC Act Protected Matters Report attached to this REF. Further safeguard measures are implemented to ensure the protection of the significance (Section 8).

8. Impact assessment

This section aims to identify potential impacts of the proposal (including access, construction and ongoing maintenance works) to the existing environment and recommend safeguards to mitigate any environmental risks.

8.1 Physical and chemical impacts during construction and operation

Environmental aspect	Existing environmental, potential impact and recommended safeguards
Is the proposal likely to impact on soil quality or land stability?	<p>The proposal would require minor excavation of the ground surface for the pad footing to support Monopole, 2x One-Web antenna mounts, and cabinet, Solar panels will be on concrete footing.</p> <p>All excavation and/or ground disturbance for the proposal would be kept to a minimum and the proposal site would be progressively restored through the duration of the works. Erosion and sediment controls would be installed and maintained in line with the requirements of Managing Urban Stormwater: Soils and Construction published by Landcom 2004, ('the Blue Book') and in accordance with the safeguards in Section 7. Upon completion of the works, all disturbed areas would be restored to their preworks or an improved condition.</p>
Is the activity likely to affect a waterbody, watercourse, wetland or natural drainage system?	No. Provided the erosion and sediment controls identified are implemented, there would be no impacts to any watercourse.
Is the activity likely to change flood or tidal regimes, or be affected by flooding?	No. As above.
Is the activity likely to affect coastal processes and coastal hazards, including those projected by climate change (e.g. sea level rise)?	No. As above.
Does the activity involve the use, storage, or transport of hazardous substances or the use or generation of chemicals, which may build up residues in the environment?	NA

Environmental aspect	Existing environmental, potential impact and recommended safeguards
Does the activity involve the generation or disposal of gaseous, liquid or solid wastes or emissions?	NA
Will the activity involve the emission of dust, odours, noise, vibration or radiation in the proximity of residential or urban areas or other sensitive locations?	<p>There are no residential properties within close proximity. Given the proximity to sensitive receivers, no noise or air emissions are anticipated to affect sensitive receivers.</p> <p>The following two mechanisms have the potential to impact air quality:</p> <ul style="list-style-type: none"> • Dust from excavation works. • Exhaust fumes and odours. <p>Some dust may be generated as a result of excavation and vehicle movements associated with the construction. However, given the distance to the nearest sensitive receivers, it is unlikely to cause an impact. Air emissions may be generated by machinery operation during construction. These emissions would be minimal and temporary. Any impacts on air quality as a result of the proposal would be localised and short term. The impacts can be adequately minimised by implementation of recommended mitigation measures, as outlined below. Operation of the proposal would therefore have a minimal impact on air quality.</p>

8.2 Biological impacts during construction and operation

Environmental aspect	Existing environmental, potential impact and recommended safeguards
Is any vegetation to be cleared or modified? (includes vegetation of conservation significance or cultural landscape value)	Vegetation will be removed by Parks, identified as non-significant.
Is the activity likely to have a significant effect on threatened flora species, populations, or their habitats, or area of outstanding biodiversity value?	<p>The proposal is unlikely to impact on threatened flora or fauna species, populations, ecological communities or their habitats.</p> <p>A search of the EPBC Act Protected Matters Report indicates there may be the following species within a one kilometre radius of the development:</p> <ul style="list-style-type: none"> • 5 x Listed threatened ecological community • 104 x Listed threatened species • 60 x Listed migratory species <p>Whilst the database searches indicate a high number of threatened species within the locality, the site has been disturbed for facilities purposes. A site inspection has been undertaken which confirmed that the site area is unlikely to</p>

Environmental aspect	Existing environmental, potential impact and recommended safeguards
	provide habitat for threatened flora and fauna. There would be no anticipated detrimental impacts to native vegetation threatened flora or fauna species, populations, ecological communities or their habitats. (The results of the Protected Matters search and the NSW Wildlife Atlas are provided in Appendix B).
Does the activity have the potential to endanger, displace or disturb fauna (including fauna of conservation significance) or create a barrier to their movement?	The proposal is unlikely to endanger, displace or disturb any fauna as the proposal does not include additional fencing or barriers.
Is the activity likely to impact on an ecological community of conservation significance?	No, the proposed works are considered low-impact. All works will be contained within the disturbed area.
Is the activity likely to cause a threat to the biological diversity or ecological integrity of an ecological community?	No, the works will be contained within the existing area. Existing development identifies the subject works will not interfere, impact or threaten the ecological community.
Is the activity likely to introduce noxious weeds, vermin, feral species or genetically modified organisms into an area?	The proposal does not involve the clearing of any weeds and noxious weeds being transported to the site.
Is the activity likely to affect any declared area of outstanding biodiversity value?	The proposal is not anticipated to have any impact on a declared area of outstanding biodiversity value.
Is the activity likely to affect any joint management agreement under the BC Act?	No, as mentioned above the site has been disturbed. Location selection and negotiation with Parks ranger has confirmed that the site works area is unlikely to provide habitat for threatened flora and fauna. There would be no anticipated detrimental impacts to native vegetation threatened flora or fauna species, populations, ecological communities or their habitats.

8.3 Community impacts during construction and operation

Environmental aspect	Existing environmental, potential impact and recommended safeguards
Is the activity likely to affect community services or infrastructure?	No, the proposal will use satellite transmission and solar to operate the facility. Existing services and infrastructure will not be impacted.
Does the activity affect sites of importance to local or the broader community for their recreational or other values or access to these sites?	No, the site is adequately separated from recreational area however the coverage will support recreational activities for the precinct.
Is the activity likely to affect economic factors, including employment, industry and property value?	No, the site is minor and will not impact existing economic factors.
Is the activity likely to have an impact on the safety of the community?	<p>The proposal complies with the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) Radio Frequency Standard (refer to Appendix C). The report shows that the maximum predicted EME would equate to 0.08% of the maximum exposure limit. This is substantially less than the maximum allowable exposure limit (where 100% of the limit is still considered to be safe).</p> <p>The existing compound is completely fenced and signed to restrict access.</p>
Is the activity likely to cause a bushfire risk?	The facility will not emit sparks or anything that would increase the risk of fire. The area surrounding the site can be maintained as requested. No vegetation clearing is proposed to be undertaken and further specialist Bushfire Risk Assessment is not required.
Will the activity affect the visual or scenic landscape?	No, the works are not within proximity to any sensitive uses, additionally the public will only partially see the structure from certain view points. Dense mature vegetation surrounds the site creating a natural buffer between roads and the community.
Is the activity likely to cause noise, pollution, visual impact, loss of privacy, glare or overshadowing to members of the community, particularly adjoining landowners?	No, the proposal will not emit noise, pollution, visual impact, loss of privacy or overshadowing to the community. The existing mature vegetation creates a buffer to ensure the existing community is not impacted.

8.4 Natural resource impacts during construction and operation

Environmental aspect	Existing environmental, potential impact and recommended safeguards
Is the activity likely to result in the degradation of the park or any other area reserved for conservation purposes?	No, proposal will be completely contained within the existing development area. All works are considered small scale.
Is the activity likely to affect the use of, or the community's ability to use, natural resources?	No, the works will not use or impact the existing natural resources.
Is the activity likely to involve the use, wastage, destruction or depletion of natural resources including water, fuels, timber or extractive materials? This should include opportunities to utilise recycled or alternative products.	No, the works will not use or impact the existing natural resources.
Does the activity provide for the sustainable and efficient use of water and energy? Where relevant to the proposal, this should include consideration of high efficiency fittings, appliances, insulation, lighting, rainwater tanks, hot water and electricity supply.	Yes, the proposal will use the existing solar power and satellite to operate the facility.

8.5 Aboriginal cultural heritage and State Heritage impacts during construction and operation

Environmental aspect	Existing environmental, potential impact and recommended safeguards
<p>Will the activity disturb the ground surface or any culturally modified trees?</p>	<p>An AHIMS search identified 5 items within a 200m buffer area, see Appendix C.</p> <p>If during the activity:</p> <ul style="list-style-type: none"> • any Aboriginal objects defined under the NPW Act are uncovered or discovered; and/or • any relics defined under the Heritage Act 1977 are uncovered or discovered; <p>The applicant must cease work immediately and notify OEH, unless the objects and/or relics are subject to a valid Aboriginal Heritage Impact Permit or Heritage Permit. Work must not recommence until advice to do so has been provided by the OEH.</p> <p>Any archaeological sites found are to be clearly marked, fenced off and signage installed to prevent access (including people and machinery). The barriers and fencing should remain in place until all works are complete and the tower is functional. If a previously unidentified Aboriginal site or suspected object is located, work should immediately cease in the area and reported to the nominated Environmental Manager.</p> <p>Physical work and ground disturbance are to be kept to a minimum. All workers should be briefed on the specific site restrictions and their obligations prior to commencement, with daily pre-start meetings and toolbox talks to include reminders of the restrictions. Daily checks of the barriers will be undertaken to ensure they are intact, and entry is restricted.</p>
<p>Does the activity affect known Aboriginal objects or Aboriginal places?</p> <p>Include all known sources of information on the likely presence of Aboriginal objects or places, including AHIMS search results.</p>	<p>As above.</p>
<p>Is the activity located within, or will it affect, areas:</p> <ul style="list-style-type: none"> • within 200m of waters* • within a sand dune system* • on a ridge top, ridge line or headland 	<p>The proposal is not located in an area that has high archaeological potential. The land has been previously disturbed and cleared of most significant vegetation. It is unlikely that any items of archaeological potential would be found within the proposed site compound or in the immediate surrounding area.</p> <p>If during the activity:</p> <ul style="list-style-type: none"> • any Aboriginal objects defined under the NPW Act are uncovered or discovered; and/or • any relics defined under the Heritage Act 1977 are uncovered or discovered;

Environmental aspect	Existing environmental, potential impact and recommended safeguards
<ul style="list-style-type: none"> • within 200m below or above a cliff face • within 20m of or in a cave, rock shelter or a cave mouth? 	<p>The applicant must cease work immediately and notify OEH, unless the objects and/or relics are subject to a valid Aboriginal Heritage Impact Permit or Heritage Permit. Work must not recommence until advice to do so has been provided by the OEH.</p> <p>Any archaeological sites found are to be clearly marked, fenced off and signage installed to prevent access (including people and machinery). The barriers and fencing should remain in place until all works are complete and the tower is functional. If a previously unidentified Aboriginal site or suspected object is located, work should immediately cease in the area and reported to the nominated Environmental Manager.</p> <p>Physical work and ground disturbance are to be kept to a minimum. All workers should be briefed on the specific site restrictions and their obligations prior to commencement, with daily pre-start meetings and toolbox talks to include reminders of the restrictions. Daily checks of the barriers will be undertaken to ensure they are intact, and entry is restricted.</p>
<p>If Aboriginal objects or landscape features are present, can impacts be avoided?</p>	<p>If during the activity:</p> <ul style="list-style-type: none"> • any Aboriginal objects defined under the NPW Act are uncovered or discovered; and/or • any relics defined under the Heritage Act 1977 are uncovered or discovered; <p>The applicant must cease work immediately and notify OEH, unless the objects and/or relics are subject to a valid Aboriginal Heritage Impact Permit or Heritage Permit. Work must not recommence until advice to do so has been provided by the OEH.</p> <p>Any archaeological sites found are to be clearly marked, fenced off and signage installed to prevent access (including people and machinery). The barriers and fencing should remain in place until all works are complete and the tower is functional. If a previously unidentified Aboriginal site or suspected object is located, work should immediately cease in the area and reported to the nominated Environmental Manager.</p> <p>Physical work and ground disturbance are to be kept to a minimum. All workers should be briefed on the specific site restrictions and their obligations prior to commencement, with daily pre-start meetings and toolbox talks to include reminders of the restrictions. Daily checks of the barriers will be undertaken to ensure they are intact, and entry is restricted.</p>
<p>Is the activity likely to affect wild resources or access to these resources, which are used or valued by the Aboriginal community?</p>	<p>No, the site is existing utilising an existing track. The proposal is not anticipated to affect wild resources in the area.</p>
<p>Is the activity likely to affect State Heritage items?</p>	<p>No, an NSW State Heritage database search resulted in no heritage items within or nearby the development site.</p> <p>Any archaeological sites found are to be clearly marked, fenced off and signage installed to prevent access (including people and machinery). The barriers and fencing should remain in place until all works are complete and the tower is</p>

Environmental aspect	Existing environmental, potential impact and recommended safeguards
	<p>functional. If a previously unidentified Aboriginal site or suspected object is located, work should immediately cease in the area and reported to the nominated Environmental Manager.</p> <p>Physical work and ground disturbance are to be kept to a minimum. All workers should be briefed on the specific site restrictions and their obligations prior to commencement, with daily pre-start meetings and toolbox talks to include reminders of the restrictions. Daily checks of the barriers will be undertaken to ensure they are intact, and entry is restricted.</p>

8.6 Other cultural heritage impacts during construction or operation

Environmental aspect	Existing environmental, potential impact and recommended safeguards
<p>What is the impact on places, buildings, landscapes or moveable heritage items?</p>	<p>No impact, any archaeological sites found are to be clearly marked, fenced off and signage installed to prevent access (including people and machinery). The barriers and fencing should remain in place until all works are complete and the tower is functional. If a previously unidentified Aboriginal site or suspected object is located, work should immediately cease in the area and reported to the nominated Environmental Manager.</p> <p>Physical work and ground disturbance are to be kept to a minimum. All workers should be briefed on the specific site restrictions and their obligations prior to commencement, with daily pre-start meetings and toolbox talks to include reminders of the restrictions. Daily checks of the barriers will be undertaken to ensure they are intact, and entry is restricted.</p>
<p>Is any vegetation of cultural landscape value likely to be affected (e.g. gardens and settings, introduced exotic species, or evidence of broader remnant land uses)?</p>	<p>The development location is not identified as a cultural landscape value.</p>

8.7 Matters of national environmental significance under the EPBC Act

Environmental aspect	Existing environmental, potential impact and recommended safeguards
<p>Is the proposal likely to impact on matters of national environmental significance as follows:</p> <ul style="list-style-type: none"> • listed threatened species or ecological communities • listed migratory species • the ecology of Ramsar wetlands • Commonwealth marine environment • world heritage values of world heritage properties • the national heritage values of national heritage places 	<p>The proposal is within an EPBC Protected area. The proposed works will be within a developed area and is considered not be a significant impact.</p>

8.8 Cumulative impacts during all stages of the activity

There is no known other development currently occurring or proposed within the Wattamolla precinct. Therefore, no further cumulative impact assessment is required.

9. Proposals requiring additional information

9.1 Lease or licence proposals under s 151 National Parks and Wildlife Act

9.1.1 Sustainability of the proposal

Only relevant to section 151 of the NPW Act- not 153D in this case.

9.1.2 Consultation requirements

N/A

9.2 Telecommunications facilities

9.2.1 Consideration of matters listed under s 153D National Parks and Wildlife Act

Factors requiring consideration	Response
1. Are there feasible alternative sites for the facility on land that is not reserved under the NPW Act?	No. The site is the best location as selected by Parks.
2. Does the site of any aboveground facility cover the minimum area possible?	Yes, all above ground equipment is kept to a minimum.
3. Is the facility to be designed and constructed to minimise risk of damage to the facility from bushfires?	Yes, area provides adequate separation from dense vegetation.
4. Has the site and construction of the facility been selected to, as far as practicable, minimise visual impact?	Yes, there will be no visual impact to the community.
5. Is it feasible to use an existing means of access to the site?	Yes, existing access will be utilised.
6. Is the facility essential for the provision of telecommunications services for land reserved under the NPW Act or for surrounding areas to be served by the facility?	Yes, Wattamolla has been identified as a black spot for mobile phone service under the Federal Government's Black Spot Program.
7. Will the facility be removed and the site restored as soon as possible after the facility becomes redundant (e.g. due to changes in technology)?	Yes.
8. Has the site been selected after taking into account the objectives set out in any plan of management relating to the land?	Yes.
9. If feasible, will the facility be co-located with an existing structure or located at a site that is already disturbed by an existing lease, licence, easement or right of way. If co-location is proposed, please indicate if: <ul style="list-style-type: none"> ○ the proponent will be the owner of the facility ○ the proponent will be a co-user of the facility. 	Yes.

9.2.2 Provision and maintenance of an asset protection zone

NPWS requires telecommunication facilities to be protected by asset protection zones (APZs) consistent with the *Telecommunications Towers in Bush Fire Prone Areas – Practice Note 1/11*, unless the Rural Fire Service (RFS) endorses a different approach (e.g. no APZ or a lesser APZ).

1. Is the proposed telecommunication facility protected by an APZ that is already consistent with the RFS Practice Note? No

If relevant, provide details and a map of the existing APZ.

2. Does the activity's scope include establishment of an APZ consistent with the RFS Practice Note? No

The proposal is within existing facilities and amenities development and will utilise the existing bushfire management. Further mitigation measures can be implemented if required.

3. If the proposed facility will not have an APZ consistent with the RFS Practice Note, has consultation occurred with the RFS? No

Further consultation can be initiated if required.

9.3 Activities within regulated catchments

The development is not within any regulated catchment.

9.4 Activities in River Murray riverine land

The development is not within the River Murray riverine lands.

10. Summary of impacts and conclusions

Environmental factor	Consideration	Significance of impact*
(a) the environmental impact on the community	Social, economic and cultural impacts as described in sections 9.3, 9.5 and 9.6	Not significant
(b) the transformation of the locality	Human and non-human environment as described in sections 9.1, 9.2 and 9.4	Not significant
(c) the environmental impact on the ecosystems of the locality	Amount of clearing, loss of ecological integrity, habitat connectivity/ fragmentation and changes to hydrology (both surface and groundwater) as described in sections 9.1, 9.2 and 9.4 and, for nationally listed threatened ecological communities, in section 9.7.	Not significant
(d) reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality	Visual, recreational, scientific and other impacts as described in section 9.3.	Not significant
(e) the effects on any locality, place or building that has— (i) aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance, or (ii) other special value for present or future generations	Impacts to Aboriginal and historic heritage associated with a locality (including intangible cultural significance), architectural heritage, social/community values and identity, scenic values and others, as described in sections 9.3, 9.5 and 9.6 and (for MNES heritage places) section 9.7.	Not significant
(f) the impact on the habitat of protected animals, within the meaning of the Biodiversity Conservation Act	Impacts to all native terrestrial species, including but not limited to threatened species, and their habitat requirements, as described in section 9.2.	Not significant
(g) the endangering of a species of animal, plant or other form of life, whether living on land, in water or in the air	Impacts to all listed terrestrial and aquatic species, and whether the proposal increases the impact of key threatening processes, as described in section 9.2	Not significant
(h) long-term effects on the environment	Long-term residual impacts to ecological, social and economic values as described in all parts of section 9.	Not significant
(i) degradation of the quality of the environment	Ongoing residual impacts to ecological, social and economic as described in section 9.4.	Not significant
(j) risk to the safety of the environment	Impacts to public and work health and safety, from contamination, bushfires, sea level rise, flood, storm surge, wind speeds, extreme heat, rockfall and landslip, and other risks likely to increase due to climate change as described in sections 9.1, 9.3 and 9.4.	Not significant
(k) reduction in the range of beneficial uses of the environment	Impacts to natural resources, community resources and existing uses as described in sections 9.3 and 9.4.	Not significant

Environmental factor	Consideration	Significance of impact*
(l) pollution of the environment	Impacts due to air pollution (including odours and greenhouse gases); water pollution (water quality health); soil contamination; noise and vibration (including consideration of sensitive receptors); or light pollution, as described in sections 9.1 and 9.3.	Not significant
(m) environmental problems associated with the disposal of waste	Transportation, disposal and contamination impacts as described in section 9.3.	Not significant
(n) increased demands on natural or other resources that are, or are likely to become, in short supply	Impacts to land, soil, water, gravel, minerals and energy supply as described in section 9.4.	Not significant
(o) the cumulative environmental effect with other existing or likely future activities	The negative synergisms with existing development or future activities as considered in section 9.8.	Not significant
(p) the impact on coastal processes and coastal hazards, including those under projected climate change conditions	Impacts arising from the proposed activity on coastal processes, and impacts on the proposed activity from those coastal processes and hazards, both current and future, as considered in section 9.1.	Not significant
(q) applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	Inconsistency with the objectives, policies and actions identified in local, district and regional plans, as considered in section 3.2.2.	Not significant
(r) other relevant environmental factors.	Any other factors relevant in assessing impacts on the environment to the fullest extent, such as native title.	Not significant

In conclusion:

- There **is not** likely to be a significant effect on the environment and an environmental impact.
Reason(s): Locating in developed area recommended by Parks. No significant vegetation will be removed or impacted.
- There **is not** likely to be a significant effect on threatened species, populations, ecological communities or their habitats and a species impact.
Reason(s): Locating in developed area recommended by Parks. No significant vegetation will be removed or impacted.
- The activity **is not** likely to have a significant impact on matters of national environmental significance listed under the Cwth Environment Protection and Biodiversity Conservation Act
Reason(s): Locating in developed area recommended by Parks. No significant vegetation will be removed or impacted.
- The activity **will not** require certification to the Building Code of Australia, Disability (Access to Premises – Buildings) Standards 2010 or Australian Standards in accordance with the NPWS Construction Assessment Procedures

11. Supporting documentation

Please provide details of documentation included with this application.

Note: Supporting information may include, but is not limited to, a sustainability assessment (for proposals requiring a lease of licence under s 151A NPW Act); threatened species assessments; AHIMS search; engineering plans and/or maps; specialist studies etc.

Document title	Author	Date
1. Proposed plans	Downer	5/03/2024
2. AHIMS search	NSW Gov	29/02/2024
3. EPBC Act Protected Matters Report	Australian Gov	29/02/2024
4. Telstra EME Report	Downer	12/03/2024

12. Fees for external proponents


Parks to confirm any fees.

13. Declarations

As the person responsible for the preparation of the REF, I certify that, to the best of my knowledge, this REF is in accordance with the EP&A Act, the EP&A Regs and the Guidelines approved under section 170 of the EP&A Regs, and the information it contains is neither false nor misleading.

Signature	
Name (printed)	Liz Mansell
Position	Senior Town Planner, Downer.
Date	15/03/2024

By endorsing the REF, the proponent confirms that the information in the REF is accurate and adequate to ensure that all potential impacts of the activity can be identified.

Signature	
Name (printed)	Steven Bishop
Position	Senior Town Planner, Downer
Date	15/03/2024