

20 March 2023

Our Ref: 364313 (NA24068.01)

NSW National Parks & Wildlife Service
Locked Bag 5022
Parramatta NSW 2124
Via email: NPWS.Utilities@environment.nsw.gov.au

Dear Sir/Madam,

**Review of Environmental Factors: Proposal for a New Telecommunications Facility at
Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624
(Previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627)**

On behalf of Amplitel and Telstra, we are submitting the attached Review of Environmental Factors (REF) document for a proposed new telecommunications facility at a new compound located at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624.

The proposed new telecommunications facility is partly funded under the Federal Government's national Mobile Blackspot Program (MBSP), which aims to provide new and upgraded mobile network access to many remote areas all over Australia. In New South Wales, one of the priority areas is Kosciuszko National Park.

The proposed works include:

- The installation of one (1) new 40-metre high Amplitel steel monopole with climbing ladder on bored pier footing,
- The installation of four (4) new Telstra 4G/5G omnidirectional antennas on a new headframe, each not more than 4.5 metres long,
- The installation of one (1) new Telstra equipment shelter, with an area not more than 7.5m²,
- Proposed new Amplitel compound security fence with an area of 60m², with a 3.0m wide double access gate,
- Proposed new Amplitel 3.0m wide access track,
- Proposed new 10m Asset Protection Zone or APZ around the proposed Amplitel compound,
- The installation of approximately 30m of new underground fibre conduits by Infracore, and
- The installation of various Amplitel and Telstra ancillary equipment such as amplifiers, brackets, cable ladders, cabling, combiners, consumer mains, distribution box, feeders, fibre pit, fibre route, a GPS antenna, meter, mounts, remote radio units, safety signs, submains, and other associated equipment necessary to ensure the proper and safe operation of the facility.

The proposed works are deemed as development 'permitted without consent' under clause 2.73(1)(a) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021 or TISEPP 2021* and/or under zone C1 (National Parks and Nature Reserves) of the *Snowy River Local Environmental Plan 2013*. In this instance, development consent is not required however, a **review of environmental factors (REF)** will be undertaken by the NSW National Parks & Wildlife Service (NPWS) in accordance with part 5, division 5.1 of the *Environmental Planning and Assessment Act (1979) or EP&A Act 1979*.

All new equipment will be installed as per original colour and manufacturer's specifications or if required, painted in a colour nominated by the NSW NPWS.

The following REF document has been prepared by Genus services Pty Ltd on behalf of Amplitel and Telstra and is accompanied by the following:

1. Proposal Plans
2. EPBC Act Protected Matters Report
3. AHIMS Report
4. ACS Ecological Impact Survey Report
5. ARPANSA EME Report
6. Summary of Public Consultation

Thank you for your assistance. If you have any further queries in relation to this REF review request, please do not hesitate to contact the undersigned.

Yours faithfully,



Archie Aparicio
Town Planner

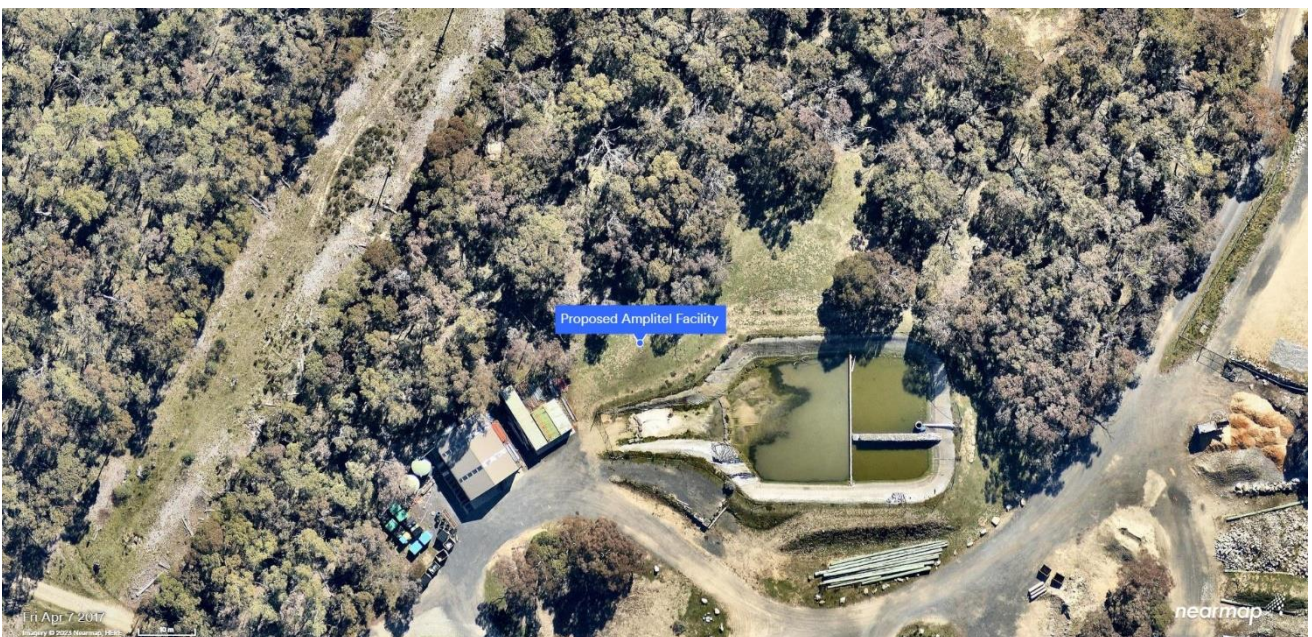
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On Behalf of Amplitel and Telstra

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Review of Environmental Factors

**Proposal for a new Telecommunications Facility at
Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624
(Previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627)**



Prepared by:

Archie Aparicio

Genus Services Pty Ltd (ABN 56 090 105 141)

**on Behalf of Amplitel Pty Ltd as Trustee for Towers Business Operating Trust (ABN 75 357 171 746)
and Telstra Limited (ACN 086 174 781)**

Project No: 364313 (NA24068.01)

March 2024

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Document Quality Control

This report is prepared by:

Genus Services Pty Ltd

ABN 56 090 105 141

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Executive Summary

This Review of Environmental Factors (REF) document has been prepared by Genus Services Pty Ltd (Genus) on behalf of Amplitel Pty Ltd or Amplitel (trading as Trustee for Towers Business Operating Trust) and Telstra Limited (Telstra) in consideration of a proposed new telecommunications facility located at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624 (previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627).

The subject site is located within Kosciuszko National Park or KNP. It is designated as land reserved under the *National Parks and Wildlife Act 1974 (NPW Act)* because of its unique natural environment, high biodiversity, and cultural significance to Australia and its people. KNP is part of a chain of 1.6 million hectares of protected national parks and reserves that make up the Australian alpine areas.

The care, control and management of reserved land, including the KNP, is the responsibility of the NSW National Parks & Wildlife Service or NPWS under the *NPW Act*. The NPWS is also the determining authority, which ensures that proposed 'activities' within all its parks and reserves undergo either a development application process or an environmental assessment under the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, before any work can commence.

Amplitel together with Telstra, are proposing to establish a new telecommunications facility at the above stated address located within Kosciuszko National Park. The facility is partly funded under the Federal Government's national Mobile Blackspot Program (MBSP), which aims to provide new and upgraded mobile network access to many remote areas all over Australia.

In summary, the proposed development includes the establishment of a new telecommunications facility consisting of a new 40-metre monopole by Amplitel together with antennas and associated infrastructure by Telstra. Amplitel is seeking to obtain a new licence agreement for a proposed new compound to host the telecommunications facility from NSW NPWS. Telstra Infracore will be laying down new underground fibre conduits to connect the facility to the network. They will be seeking a separate tenure agreement with NSW NPWS.

Once operational, the proposed facility will provide superfast 4G and 5G mobile network service to benefit park employees and residents of the nearby operational centres and park village accommodation, as well as the thousands of park visitors. In the future, the facility will provide the opportunity for other carriers to co-locate onto the facility and allow to upgrade to new and upcoming technologies.

Amplitel and Telstra consider the proposed works as development 'permitted without consent' under clause 2.73(1)(a) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021 or TISEPP 2021* and/or zone C1 (National Parks and Nature Reserves) of the *Snowy River Local Environmental Plan 2013*. In this instance, development consent is not required however, a **review of environmental factors (REF)** will be undertaken by the NSW National Parks & Wildlife Service (NPWS) in accordance with part 5, division 5.1 of the *Environmental Planning and Assessment Act (1979) or EP&A Act 1979*. Determination of the REF may also include public and community consultation by NSW NPWS.

Amplitel and Telstra have undertaken its own public consultation for the proposed activity in accordance with section 6 of the *Mobile Phone Base Station Deployment Code 2020*. Public and stakeholder consultation was

conducted between 7 February and 14 March 2024. During this period, one (1) submission was received from an Officer of KNP Educational Centre. Her enquiry relates to the location of the proposed facility. No objections received on the proposed telecommunications facility. A summary of the outcomes of the consultation with final report is included in this report under **appendix 6**.

Once the REF has been assessed, NSW NPWS may recommend the proposed activity or development to proceed. However, the Minister (or a representative) will assess the proposed development under section 153D of the *NPW Act* prior to granting a new licence agreement for the proposed new Amplitel compound.

We are therefore submitting this REF document to NSW NPWS for assessment and review to allow the proposed activity to be granted with the requested licence agreement.

1. Brief Description of the Proposed Activity

Proposal Name and Brief Description	Proposed new telecommunications facility at Kosciuszko National Park. The proposed activity includes the establishment of a new Telstra telecommunications facility within a proposed new Amplitel compound at the address below. Amplitel is seeking a new licence agreement with NSW NPWS for the proposed compound area. Telstra Infracore will seek a separate tenure agreement with NSW NPWS for the proposed underground fibre conduits.
Location of Activity	Physical Address: Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624 (Previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627) Lot Description: N/A GPS Coordinates: -36.34796°, 148.56759° RFNSA Ref Number: 2624006
Name of NPWS Park or Reserve	Kosciuszko National Park or KNP
Description of Any Unreserved Land	Not applicable
NPWS Area	Alpine-Queanbeyan Area
Council	Snowy Monaro Regional Council
NSW State Electorate	Monaro Electorate
Estimated Capital Cost of Project	\$450,000.00
Estimated Duration of Project	Approximately 3 months
Proposed Commencement Date	6 June 2024 (early access agreement preferred).
Proposed Completion Date	6 September 2024

Table 1: Brief Description of Proposed Activity.

2. Proponent's Details

Contact Name	Archie Aparicio of Genus Services Pty Ltd (ABN 56 090 105 141) On behalf of Amplitel Pty Ltd as Trustee for Towers Business Operating Trust (ABN 75 357 171 746) and Telstra Limited (ACN 086 174 781)
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Email	feedback@genus.com.au

Proponent External to NPWS or DPE Environment and Heritage Group (EHG)

Organisation	Genus Services Pty Ltd
ACN/ABN	ACN 56 090 105 141

NPSW/EHG Proponents

Area Manager or Unit Manager	Not applicable. The proposed development is external to NPWS.
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3. Permissibility and Assessment Pathway

3.1 Permissibility under NSW Legislation

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

Telstra is proposing to establish a new telecommunications facility within a proposed new Amplitel compound within Kosciuszko National Park (KNP). The proposed facility is composed of a new 40-metre steel monopole, together with new antennas, and various ancillary equipment necessary for the safe operation of the facility, such as an Asset Protection Zone or APZ, underground fibre conduits, etc. Details of the proposed development can be found under **section 6.2** of this REF document.

All proposed works will take place in a section that forms part of KNP's operational areas. The area has been previously disturbed when existing facilities were established to provide services and amenities to KNP staff. The NSW National Parks and Wildlife Service or NPWS assisted in selecting the proposed host site.

Based on the description above, Amplitel and Telstra consider the use of land to establish a new telecommunications facility as an 'activity' as defined in accordance with section 5.1 of the *EP&A Act*. The proposed activity or development is deemed as development 'permitted without consent' under the following Environmental Planning Instruments (EPIs):

- Clause 2.73(1)(a) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* or *TISEPP 2021* on land reserved under *NPW Act*, or acquired under Part 11 of that Act, if the development is for a use authorised under that Act, and/or
- Zone C1 (National Parks and Nature Reserves) of the *Snowy River Local Environmental Plan 2013* or *Snowy River LEP 2013* for uses authorised under the *NPW Act*.

It is noted that *TISEPP 2021* prevails over the *Snowy River LEP 2013*.

In this instance, development consent is not required however, a **review of environmental factors (REF)** will be undertaken by the NSW National Parks & Wildlife Service (NPWS), as the determining authority, in accordance with part 5, division 5.1 of the *Environmental Planning and Assessment Act (1979)* or *EP&A Act 1979*.

Amplitel is seeking for a new licence agreement with NSW NPWS for the proposed new telecommunications facility compound, with an area of 61.61m² (10.1m x 6.1m). Once the REF has been assessed, NSW NPWS may recommend the proposed activity or development to proceed. However, the Minister (or a representative) is required to assess the proposed development under section 153D of the *NPW Act* prior to granting a new licence agreement for the proposed new Amplitel compound.

Telstra Infracore will be installing approximately 30 metres of underground fibre conduits running from the pit to the proposed equipment shelter. In this case, Telstra Infracore will be seeking a separate tenure agreement with NSW NPWS for the proposed underground cable works.

3.1.1 National Parks and Wildlife Act 1974 (NPW Act) and NPW Regulation

The proposed activity is permissible under the *NPW Act* as it is considered to be consistent with the objects of said Act, which generally relates to the conservation of natural or cultural enjoyment or for public use and enjoyment. The reasons for this are provided in the following sections.

Objects of the Act and Reserve Management Principles

Sections 2A and 30E of the *NPW Act* specify the purpose of setting aside reserve land, such as national parks, for the conservation of natural habitats, ecosystems, biological diversity, landscape and places of historical and cultural significance, among others, with the overall goal of nature conservation.

The proposed activity is consistent with sections 2A and 30E of the *NPW Act* as it meets the set objectives and guidelines for National Parks. By consciously selecting a host site within an area that has been previously disturbed by existing development or 'activities', it is able to provide mobile network service to the intended target community while ensuring further protection and conservation of undeveloped and untouched reserved land within Kosciuszko National Park.

Many areas of KP are known to be bushfire prone areas, including the host site. The ability to connect to mobile phone service is vital in these areas as it can connect the community to emergency services, when needed. Access to fast and reliable communication service will ensure KNP can be further protected from environmental damage.

Plan of Management

Title and relevant sections of plan of management or statement of management intent

As prescribed by section 81 of the NPW Act, a Plan of Management (PoM) must be adopted for the management of national parks, nature reserves and conservations areas. In this case, the 2006 Plan of Management of Kosciuszko National Park or *Plan* (as amended in 2010, 2014 and 2021) applies to the subject site.

Amplitel and Telstra believe the proposed telecommunications facility is consistent with the 2006 Plan of Management of Kosciuszko National Park. The *Plan* for KNP highlights the significance of the park on an international, national and regional level with its very unique individual qualities. In summary, the *Plan* aims to accommodate the many needs of people using the park by allowing certain uses and activities within identified zones to better manage and control development inside KNP.

The proposed new facility will be established in a previously developed area of KNP, located at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2627 (coordinates -36.34796°, 148.56759°). The host site is on the verge of an area zoned under the *Plan* as 'Visitors Services Zone.' This zone includes the four (4) major alpine resorts and nine (9) additional areas, including the Sawpit Creek precinct where the host site is located. Various amenities can be found in this precinct, which includes the campground, education centre and offices, car parks, landfill and a former service station. The *Plan's* objective for this zone is to provide short-duration recreational opportunities for visitors to experience, enjoy and understand the values of the park while catering to their various needs and interests in a natural setting.

Notwithstanding, park employees and visitors still need to be connected to a reliable mobile phone network service especially in secluded areas of the park. This is most essential when there is a need to access emergency services such as ambulance, fire, police and rescue. Amplitel and Telstra believe the proposed telecommunications facility is suitably sited at this location as it will not only use land in an appropriately zoned area, but it can also provide optimum mobile phone coverage.

Conservation Action Plan (CAP)

Title and relevant section of any applicable conservation action plan (CAP) for an asset of intergenerational significance (AIS) and the relevant AIS site number.

No Conservation Action Plan (CAP) applies to the proposed development.

Leasing, Licensing and Easement

Leasing, licensing and easement provisions ([Part 12](#))

Amplitel is seeking to obtain a new licence for the proposed telecommunications compound to host the new Telstra facility from NSW NPWS under section 153D of the *NPW Act*. The proposed activity meets the requirements under s.153 of the *NPW Act* as it will provide new and upgraded mobile phone network and emergency connectivity services to the immediate and surrounding areas of the facility. Once operational, the new service will benefit park employees, residents of the village accommodation areas and visitors to the area.

Note: Telstra Infracore will be seeking a separate tenure agreement with NSW NPW under the *NPW Act* for the proposed underground fibre conduit, connecting the facility to the rest of the network.

Internal NPWS/EHG Projects

(for internal NPWS/EHG projects only) NPWS/EHG management powers and responsibilities ([s 8](#) and [s 12](#))

Not Applicable, the proposed development is not an internal NPWS/EHG project.

3.1.2 Wilderness Act 1987 (for activities in wilderness areas)

This section does not apply to the proposed ‘activity’ as the subject site is not located in a wilderness area.

3.1.3 Biodiversity Conservation Act 2016 (BC Act)

A Vegetation Pre-clearance Ecological Impact Survey report was organised by the team at Amplitel and Telstra through ACS Environmental Pty Ltd (ACS) to assess the impact of the proposed development in relation to flora and fauna species found within the subject site.

The Ecological Impact Survey concludes that the proposed works are not expected to impact any naturally occurring threatened ecological communities or any threatened native flora or fauna species under the *Biodiversity Conservation Act 2016 (BC Act)*. Based on the survey findings, the proposed telecommunications facility is permissible under section 7.3 of the *BC Act*.

A copy of the Ecological Impact Survey report by ACS is attached as **appendix 4**.

3.1.4 Rural Fires Act 1997 (RF Act)

The subject site is located in an area that is considered bushfire prone land under the NSW Planning Portal as shown in **figure 1** below.

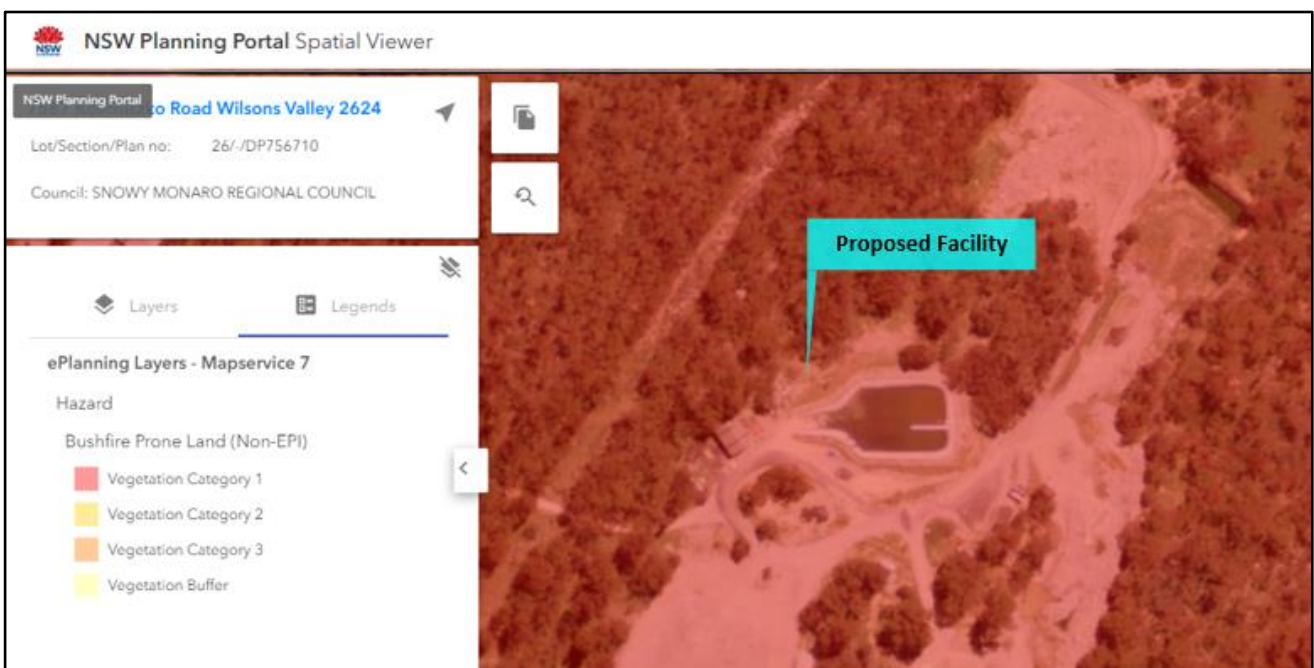


Figure 1: Bushfire Prone Land Map (Source: NSW Planning Portal).

In particular, the subject site and surrounding areas are identified as Vegetation Category 1. The NSW Rural Fire Service (RFS) describes this category as the “highest combustibility and likelihood of forming fully developed fires including heavy ember production.”

Amplitel is proposing a 10.0-metre Asset Protection Zone or APZ around the facility as part of the proposed development to ensure the protection of the proposed compound and all equipment. The host site has already been previously cleared of vegetation however, some existing trees, shrubs and other vegetation inside the proposed APZ needs to be cleared.

As previously mentioned, a Vegetation Pre-clearance Ecological Impact Survey report was completed by ACS on behalf of Amplitel and Telstra to assess the native flora and fauna that may be affected by the proposed new telecommunications facility and Asset Protection Zone (APZ).

ACS reports that although the proposed area for the facility and APZ are mostly cleared of vegetation, the following were found to exist on site and would require removal:

- Snow Gum (*Eucalyptus pauciflora*) would be removed from a 10m band of woodland surrounding the site to the north-east, north, north-west and west to form an APZ where the canopy species would be reduced to about 15% cover. This may require the removal of approximately 15 small individuals of Snow Gum as protection from bushfires and
- Some small tussocks of *Poa labillardierei* and *Juncus phaenthus* to be cut to a height of about 100mm,

Materials removed are recommended to be used as mulch onsite and spread evenly within the bushland.

ACS notes PCT 3382 or 'Kosciuszko Eastern Slopes Mountain Gum Forest' as the ecological plant community occurring at the subject site. It is not listed as a threatened ecological community on either registers of the BC Act (2016) or the Commonwealth EPBC Act (1999). No Threatened Ecological Community (TEC) associated with this PCT.

This means that none of the individual species recorded within the construction footprint of the facility and APZ are rare or threatened species.

Once the APZ is established, it will be maintained for the life of the facility.

The Ecological Impact Survey report by ACS is attached as **appendix 4**.

3.2 Environmental Planning and Assessment Act 1979 (EP&A Act)

3.2.1 Assessment Pathway

It is confirmed that a REF is the applicable assessment pathway if each of the following apply.

The activity may be undertaken without development consent under the provisions of s 2.73(1)(a) of the Transport and Infrastructure SEPP as it is:

on land reserved under the NPW Act or acquired under Part 11 of the NPW Act, **and**

for a purpose authorised under the NPW Act.

- The activity is not designated development under Schedule 3 of the Environmental Planning and Assessment Regulation 2021
- The activity is not state significant infrastructure under Schedule 3(7) of the Planning Systems SEPP.
- The activity is not designated development under the s 2.7(2) of the Resilience and Hazards SEPP as:
- it is not on land mapped as littoral rainforest or coastal wetland, **or**
 - it is on land mapped as littoral rainforest or coastal wetland, **and** that land is reserved (not acquired) under the NPW Act, **and** the activity is consistent with the adopted plan of management (s 2.7(6) of the Resilience and Hazards SEPP), **or**
 - it is on land mapped as littoral rainforest or coastal wetland, **and** the activity is routine maintenance with adverse effects restricted to the minimum possible (s 2.7(4) of Transport and Infrastructure SEPP), **or**
 - it is coastal protection works by a public authority and is either identified in a coastal management program, or is beach nourishment, temporary placement of sandbags or routine maintenance and repair of existing coastal protection works (s 2.16(2)(a) of Resilience and Hazards SEPP).
- The activity is not declared to be exempt development under an environmental planning instrument or fails to fully meet the requirements for exempt development.

Overall, the proposed activity or development is deemed to be 'permitted without consent' under:

- Clause 2.73(1)(a) of *TISEPP 2021* on land reserved under NPW Act, or acquired under Part 11 of that Act, if the development is for a use authorised under that Act, and/or
- Zone C1 (National Parks and Nature Reserves) of the *Snowy River LEP 2013* for uses authorised under the *NPW Act*.

It is also considered permissible and consistent with the aims, objectives and provisions of the *NPW Act* and *NPW Regulation*. An environmental impact assessment of the proposal will be completed by NSW National Parks & Wildlife Service through a Review of Environmental Factors (REF) under division 5.1 of the *EP&A Act*.

The REF determination by NSW NPWS will be considered by the Minister when assessing the proposed development prior to granting a new licence under section 153D of the NPW Act for the proposed new compound by Amplitel and the underground conduits by Telstra Infracore.

3.2.2 Strategic Plans

Is the activity proposed on land covered by a local strategic planning statement, regional strategic plan or district strategic plan made under Division 3.1 of the Act?

No

Yes

3.3 Other Relevant NSW Legislation

3.3.1 Coal Mine Subsidence Compensation Act 2017

Not applicable. The proposed telecommunications facility does not involve works or is not located in an area identified as mine subsidence district.

3.3.2 Fisheries Management Act 1994

Not applicable. The proposed telecommunications facility will not involve works that will affect fish, fish habitat or marine vegetation.

3.3.3 Heritage Act 1977

Not applicable. The subject site is not an item or located in an area listed under the State Heritage Register (SHR).

3.3.4 Marine Estate Management Act 2014

Not applicable. The proposed telecommunications facility will not take place in an area that will affect a marine park or aquatic reserve.

3.4 Does Commonwealth Legislation Apply?

3.4.1 Environmental Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) applies as the activity is on land that contains the following, or the activity may affect:

The EPBC Act does not apply as the activity will not affect any of the following:

- world heritage or national heritage values of a place on the World Heritage List or National Heritage List
- the ecology of a Ramsar wetland
- nationally listed threatened species and ecological communities or listed migratory species.

Overall, Amplitel and Telstra believe that the *EPBC Act* does not apply as the proposed telecommunications facility will have no significant impact on the Matters of National Environment Significance under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The subject site has been mostly cleared with very minimal expected disturbance to KNP, relative to its size. No naturally occurring threatened ecological communities, or any threatened native flora or fauna species will be impacted by the proposed works at the subject site. Migratory species known to occur within the area are considered highly mobile, and none would be impacted by the proposal.

Refer to **sections 8.5** and **9.7** of this REF document for a full assessment of the proposal under the *EPBC Act*.

3.5 Consistency with NPWS Policy

The following NPWS policy applies to the proposed telecommunications facility.

Policy Name	How Proposal is Consistent
2006 Plan of Management Kosciuszko National Park (as amended in 2010, 2014 and 2021)	The proposed telecommunications facility by Amplitel and Telstra is consistent with the Plan of Management for Kosciuszko National Park. The proposed telecommunications facility will be established in an appropriately zoned area under the Plan that has already been previously disturbed with established structures. This will ensure that untouched areas or wilderness areas of the KNP will remain protected.

Table 2: Consistency with NPWS Policy.

3.6 Summary of Licences and Approvals

3.6.1 Approval under the National Parks and Wildlife Act

Telstra is proposing to install a new telecommunications facility within a new Amplitel compound and is seeking a new licence agreement from NPWS under section 153D of the *NPW Act*.

Section/Clause	Short Title	Type of Approval (summary only)
NPW Act s. 153D	Leases, licences and easements for broadcasting or telecommunications facilities.	For the purpose of the erection, use or maintenance of broadcasting or telecommunications (telco) facilities, the Minister may grant leases, licences or easements or rights of way through, on or in certain lands reserved under this Act, subject to such terms and conditions as the Minister may determine.

Table 3: Approval under the National Parks and Wildlife Act.

3.6.2 Other Approvals

No other approvals are being sought that apply under this section.

3.6.3 Publication Triggers

Trigger	Applicable?
The activity has a capital investment value of more than \$5million.	Does not apply. The total cost of the project is estimated at \$450,000.00
The activity requires the approval of permit as referred to in any of the following provisions before it may be carried out: <ul style="list-style-type: none"> ▪ <i>Fisheries Management Act 1994</i>, sections 144, 200, 205 or 219, ▪ <i>Heritage Act 1977</i>, section 57, ▪ <i>National Parks and Wildlife Act 1974</i>, section 90, ▪ <i>Protection of the Environment Operations Act 1997</i>, sections 47–49 or 122, or 	Does not apply. The proposed telecommunications facility is not affected by any of the listed provisions.
The determining authority considers that it is in the public interest to publish the review.	NSW NPWS requires the public exhibition of proposals for telecommunications facilities under section 153D of the <i>NPW Act</i> . It will help raise public awareness of the proposal and assist in assessing its environmental impacts, prior to determination.

Table 4: Publication Triggers.

Amplitel and Telstra supports the public exhibition of its proposal for a new telecommunications facility and compound at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2627, to allow the public to provide their comments prior to determination of the REF.

4. Consultation – General

4.1 Consultation Required Under Transport and Infrastructure State and Environmental Planning Policy

Consultation with the following authorities is required as the proposal will affect the items ticked below.

4.1.1 Local Councils (sections 2.10, 2.11, 2.12 and 2.14)

- local council infrastructure or services (such as stormwater, sewer, roads and footpaths)
- heritage items listed under the local environmental plan (LEP)
- flood patterns on flood-liaible land
- land within the mapped coastal vulnerability area and the activity is inconsistent with a certified coastal management program for the land.

None of items above apply to the proposed activity. Consultation is not required as the proposed telecommunications facility does not affect any of the items presented under this section. The proposal will not affect local Council infrastructure services, is not a heritage listed item or place under the Snowy River LEP 2013, not located in a flood prone area, and is not located in a coastal zone.

However, Amplitel and Telstra have undertaken its own community and stakeholder consultation in accordance with section 6 of the *C564:2020 Mobile Phone Base Station Deployment Code or Industry Code*. The consultation period commenced on 7 February 2024 and closed on 14 March 2024 for a total of 26 business days. This is over and above the recommended consultation period under the *Industry Code* of up to 20 business days.

A full summary of the consultation process and outcome is provided in this REF document under **appendix 6**.

The results of the consultation process will form part of this REF document.

4.1.2 National Park and Other C1-zoned land (sections 2.15(2)(a) and 2.15(2)(b))

- land zoned C1 (formerly E1) or on/adjacent to land reserved or acquired under the NPW Act

Outcomes of consultation with NPWS:

Amplitel and Telstra have been in consultation with Project Officers of the Utilities, Access, Licensing and Easements and Utilities EIA Advice teams of the NSW National Parks and Wildlife Service in selecting candidate sites. The proposed host site was chosen through recommendations from both teams, and consideration of

various factors such as network coverage, engineering, radio frequency, community, environmental, and other objectives.

4.1.3 Roads or Maritime (sections 2.15(2)(c) or Schedule 3)

Is the activity:

- a fixed or floating structure in navigable waters
- traffic-generating development on main roads?

This section does not apply. The proposed telecommunications facility is not a floating structure and will not generate traffic on main roads.

4.1.4 Sliding Spring Observatory (section 2.15(2)(d))

- increase the amount of artificial light in the dark night sky within 200 kilometres of the Siding Spring Observatory

This section does not apply. The proposed telecommunications facility will not increase the amount of artificial light in the dark night sky.

4.1.5 Defence Communications Buffer (section 2.15(2)(e))

- located within the buffer around the defence communications facility near Morundah as mapped under the Lockhart, Narrandera or Urana LEPs

This section does not apply. The proposed telecommunications facility is not located within or around the defence communications facility near Morundah.

4.1.6 Mine Subsidence Area (section 2.15(2)(f))

- land in a mine subsidence district within the meaning of the [Coal Mine Subsidence Compensation Act 2017](#).

This section does not apply. The proposed telecommunications facility is not located in a mine subsidence district.

4.2 Consultation Requirements Under National Parks and Wildlife Act for Leases and Licences

If the activity requires a lease or licence under s 151 or s 151H of the NPW Act, indicate if it requires:

- public consultation under [s 151F](#)
- referral to the NPW Advisory Council or another advisory committee under [s 151G](#).

Section 4.2 does not apply. The proposed telecommunications facility does not require a lease or licence under section 151 or 151H of the *NPW Act*.

4.3 Targeted Consultation

4.3.1 Adjacent Landowners

This section does not apply to the proposed telecommunications facility. The subject site is contained within lands under the management of the NSW NPWS. There are no adjacent landowners. However, interested and affected parties (IAPs) located within the immediate vicinity of the proposed new Amplitel and Telstra facility were notified under the community consultation.

A complete list of said IAPs are provided under **section 6** of this report.

4.3.2 Wider Community Consultation and/or Notification of Works

As part of the consultation under the Industry Code discussed under **section 4.1.1** of this REF document, the wider community was notified of the proposed telecommunications facility by placing an advertisement in The Monaro Post on 7 February 2024. Signs were also placed at two (2) locations, at the entrance of the access road leading to the site along Kosciuszko Road and on the fence near the host site.

A full summary of the consultation process and outcome is provided in this REF document. **Appendix 6** includes all relevant documents for this process.

4.3.3 Interest Groups and/or Notification

As part of the consultation under the Industry Code discussed under **section 4.1.1** of this REF document, interested affected parties (IAPs) were individually notified of the proposed telecommunications facility.

A full summary of the consultation process and outcome is provided in this REF document. **Appendix 6** includes all relevant documents for this process.

5. Consultation – Aboriginal Communities

5.1 Native Title Notification Requirements

1. Is the land subject to an [Indigenous land use agreement \(ILUA\)](#)?
 No ([Go to Question 2](#))
 Yes
2. Has native title been **extinguished**?
 No or unclear ([Go to Question 3](#))
 Yes
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 ([Go to Question 4](#))
 Yes
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)
 - or**
 - b. involves the grant of a lease? No ([Go to Question 5](#))
 Yes
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)? No
 Yes ([The notification requirements under the Native Title Act do not apply but consultation with native title holders/claimants may still be required under other policies to consult with Aboriginal people. Proceed to Sections 5.2 and 5.3](#))

5.2 Parks Under Other Joint Management Arrangements

Is the park’s management subject to another joint management arrangement such as a memorandum of understanding?

- No ([Go to Section 5.3](#))
 Yes

5.3 Other Parks

This section does not apply to the proposed telecommunications facility.

Summary of Community and Stakeholder Consultation Efforts

Amplitel and Telstra have undertaken its own community and stakeholder consultation patterned after section 6 of the *C564:2020 Mobile Phone Base Station Deployment Code or Industry Code*. The consultation period commenced on 7 February 2024 and closed on 14 March 2024 for a total of 26 business days. This is over and above the recommended consultation period under the *Industry Code* of up to 20 business days.

Although development consent is not required, Snowy Monaro Regional Council was notified of the proposed development. Other interested and affected parties that were notified include other park entities within the area, and the Federal and State Members of Parliament.

The wider community was notified of the proposed telecommunications facility by placing an advertisement in *The Monaro Post* on 7 February 2024. Signs were also placed at two (2) locations, at the entrance of the access road leading to the site along Kosciuszko Road and on the fence near the host site.

One (1) enquiry was received from an Officer of KNP Educational Centre, but no submissions received from the general public.

A summary of the community and stakeholder consultation campaign has been sent to Council in a final report. The final report, together with other pertinent documents used in the community and stakeholder consultation, have been compiled and included with this REF document under **appendix 6**. A copy of all documents used during the consultation period can be provided to NSW NPWS, should it be required.

6. Proposed Activity (or Activities)

6.1 Location of Activity

The proposed new Telstra telecommunications facility, consisting of a new 40-metre monopole, antennas, outdoor equipment shelter, associated equipment will be established within the proposed new Amplitel compound within Kosciuszko National Park. The specific site location is presented below:

Description of Location	The subject site is part of an unsubdivided parcel of land that forms part of the Kosciuszko National Park (KNP). It is located approximately 144m south from the boundary of Lot 26, DP 756710.		
Site Commonly Known as	Kosciuszko National Park village accommodation and operational area.		
Park Name	Kosciuszko National Park or KNP		
Other Tenures	N/A		
Lot/DP	N/A (Near lot 26, DP 756710)		
Street Address	Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624 (previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627).		
Site Reference	Easting: -36.34796°	Northing: 148.56759°	MGA Zone: 55

Table 5: Location of Activity.



Figure 2: Location of proposed development.



Figure 3: Current image of proposed site taken from the southern side, facing the future facility. (Photo taken from site visit, July 2023).

6.2 Description of the Proposed Activity

Amplitel and Telstra are proposing to establish a new telecommunications facility at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624 (previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627).

The proposed new telecommunications facility aims to provide new and upgraded mobile network access to park employees and residents of the village accommodation, as well as visitors to Kosciuszko National Park.

The proposed new facility will include:

- The installation of one (1) new 40-metre high Amplitel steel monopole with climbing ladder on bored pier footing,
- The installation of four (4) new Telstra 4G/5G omnidirectional antennas on a new headframe, each not more than 4.5 metres long,
- The installation of one (1) new Telstra equipment shelter, with an area not more than 7.5m²,
- Proposed new Amplitel compound security fence with an area of 60m², with a 3.0m wide double access gate,
- Proposed new Amplitel 3.0m wide access track,
- Proposed new 10m Asset Protection Zone or APZ around the proposed Amplitel compound,
- The installation of approximately 30m of new underground fibre conduits by Infracore, and

- The installation of various Amplitel and Telstra ancillary equipment such as amplifiers, brackets, cable ladders, cabling, combiners, consumer mains, distribution box, feeders, fibre pit, fibre route, a GPS antenna, meter, mounts, remote radio units, safety signs, submains, and other associated equipment necessary to ensure the proper and safe operation of the facility.

All new equipment will be installed as per original colour and manufacturer's specifications or if required, painted in a colour nominated by the NSW NPWS.

Refer to **figures 4** below and **appendix 1** for the site lay out proposal plans.

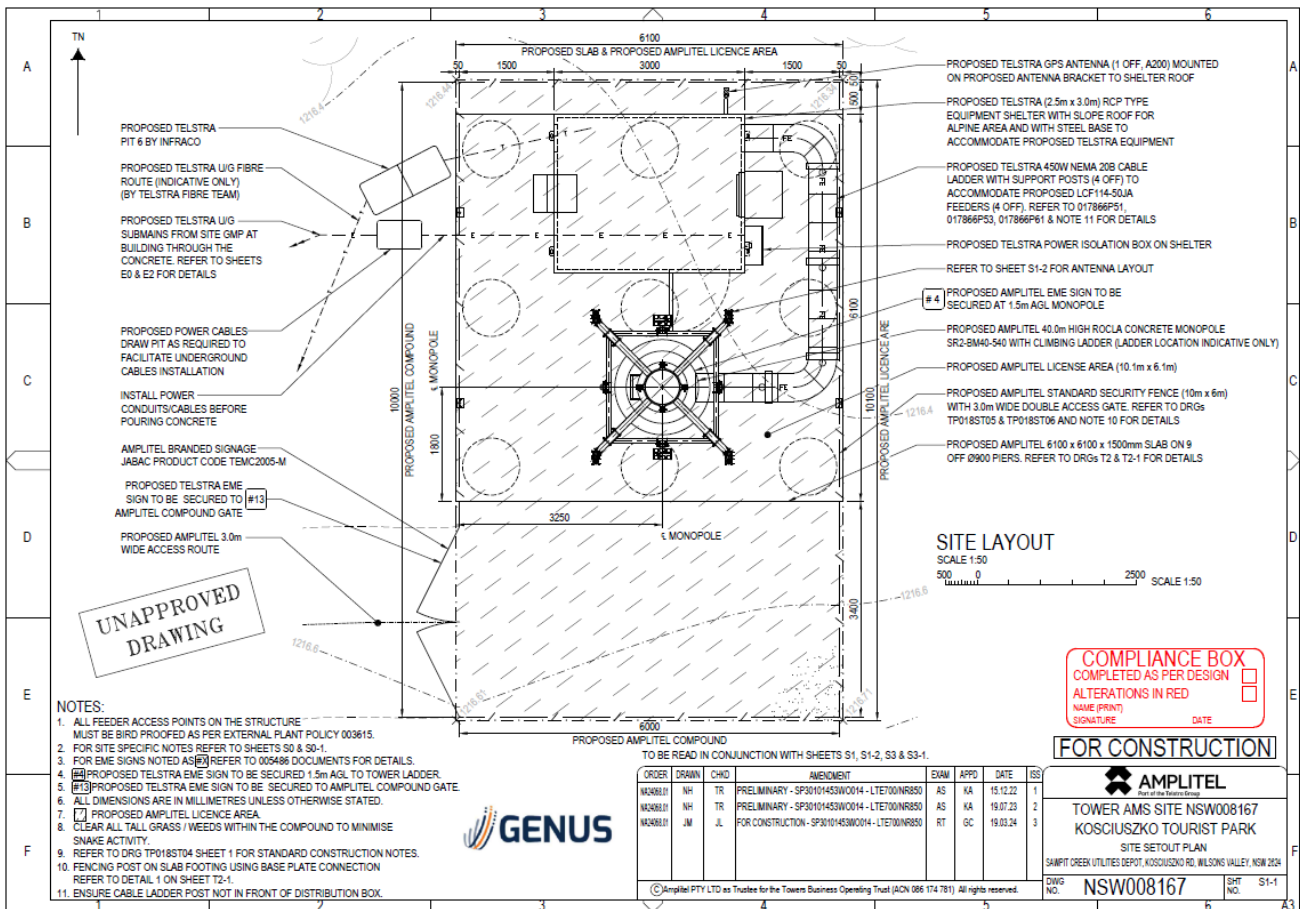


Figure 4: Proposed site lay out.

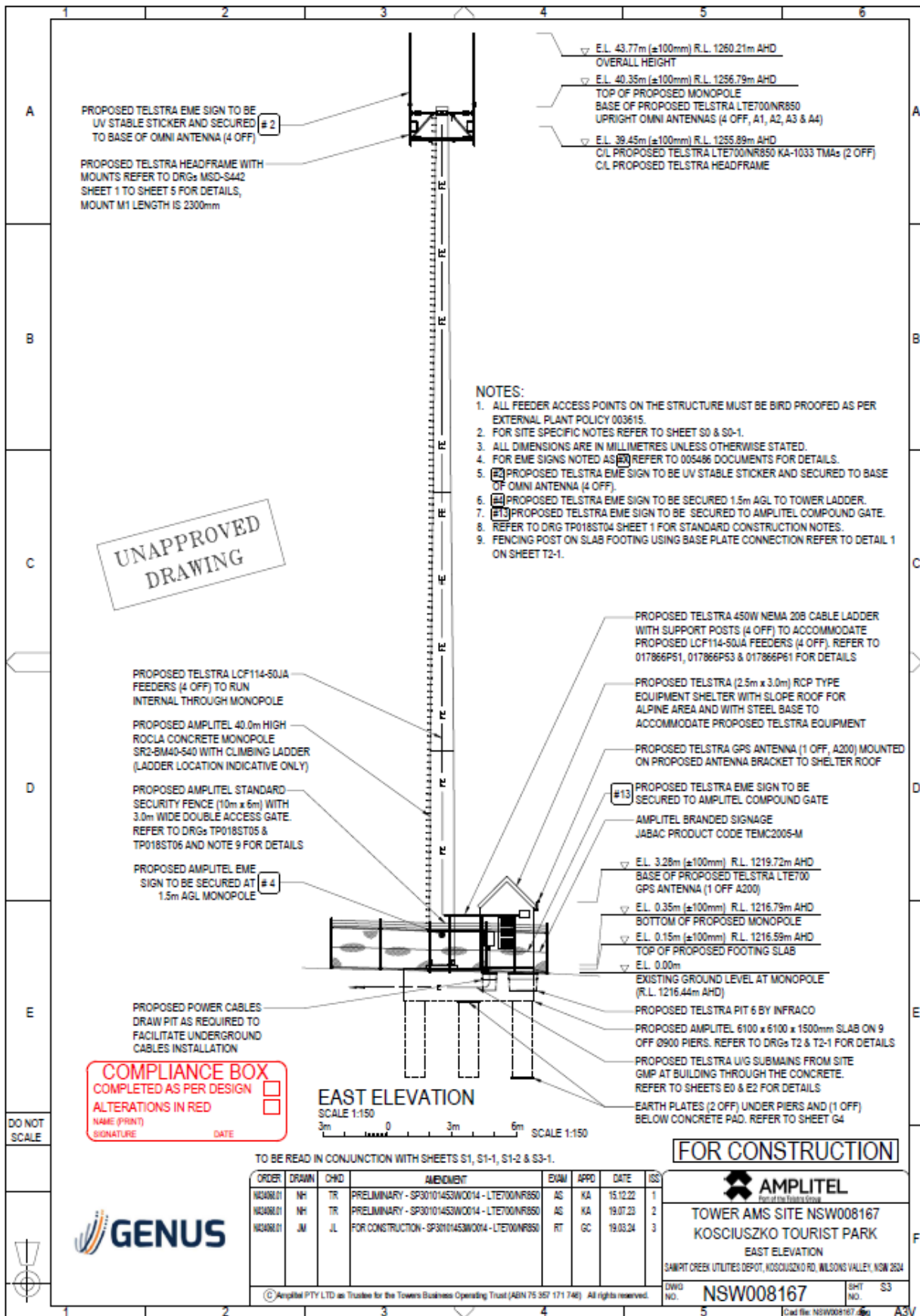


Figure 5: Proposed elevation plans.

6.2.1 The Proposed Activity: Pre-construction, Construction, Operation and Remediation

The development and construction of the mobile phone base station primarily consists of the following processes:

- Pre-construction – ensuring that the land is suitable for construction. This is inclusive of confirming existing structural assessments and the provisioning of cabling,
- Construction period – The installation of new equipment is reflective of the scope of works outlined within this REF document, and
- Network Integration – Ensuring that the mobile phone base station can connect with both end users and other sites within the Telstra network.
- Remediation – Not required as the host site is not contaminated land, and the proposed works does not involve the removal of existing equipment.

6.2.2 The Activity Footprint (Size of the Area of Impact)

The proposed new telecommunications facility by Telstra consisting of a new 40-metre monopole, antennas, equipment shelter and associated equipment will be established within the proposed new Amplitel compound. Amplitel is proposing to obtain a new licence for an area approximately measuring of 61.61m² (10.1m x 6.1m) at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624. In addition, Amplitel is proposing a 10-metre Asset Protection Zone to meet legislative and regulatory requirements since the area is known to be bushfire prone.

Telstra Infraco is also proposing to lay down approximately 30 metres of new underground fibre conduits to connect the facility to the rest of the network. The connection will run from the existing pit up to the new facility as indicated in **figure 6** below. Please note: Telstra Infraco will be seeking a separate tenure agreement with NSW NPWS for the proposed fibre run.

Open trenching for the installation of underground fibre will be executed in compliance with the Australian Standard Section 93.080 – Road Engineering AS1165 – 1982 – Traffic hazard warning lamps.



Figure 6: Proposed underground fibre proposal by Telstra Infraco.

6.2.3 Proposed Construction Methods, Materials and Equipment

All new equipment will be installed as per original colour and manufacturer's specifications that meet relevant Australian engineering standards. This includes meeting relevant energy efficiency ratings, the use of high-quality materials, the use of compliant equipment that meets relevant standards, and complying with relevant regulations, etc.

6.2.4 Receival, Storage and On-site Management for Materials Used in Construction

Amplitel and Telstra will use best practices when receiving, storing and keeping materials on-site to be used for construction. A designated area will be nominated to temporarily store equipment and materials on-site during the construction of the facility. All excess materials, rubbish and equipment will be removed once the facility is complete. No materials, equipment and waste will be left on site.

6.2.5 Earthworks or Site Clearing Including Extent of Vegetation to be Removed

There are minimum expected earthworks required for the proposed telecommunications facility, which will be limited to the area where the monopole will be established. However, some excavation will be required for the proposed underground fibre cables to be installed by Telstra Infracore.

The site has been previously disturbed when existing facilities were established to provide accommodation and amenities to residents and staff of the various park offices located in the area. The subject site has been mostly cleared of vegetation. However, the total area proposed for vegetation clearing and installation of the facility and for the associated APZ is estimated at 338m², with much of the vegetation comprised of grazed exotic grassland dominated by Common Couch.

ACS is proposing to lop or thin out some eucalypt canopies within the APZ by approximately 15% canopy cover. ACS is also proposing to remove ground cover plants such as tussocks to a height of about 100mm as ongoing maintenance. All materials to be removed will be used as mulch and to be spread evenly within the bushland.

The Ecological Impact Survey report mentions that no naturally occurring threatened ecological communities or any threatened native flora or fauna species will be impacted by the proposed works at the subject site. The plant community that most likely occurs at the subject site is a highly structurally and floristically modified form of PCT 3382, described as 'Kosciuszko Eastern Slopes Mountain Gum Forest' (DPE 2024). It is not listed as a threatened ecological community on either registers of the BC Act (2016) or the Commonwealth EPBC Act (1999).

ACS concludes that the works are not expected to impact on any listed threatened entities in relation to the *BC Act* or *EPBC Act* at the proposed site and will be strictly undertaken with the recommended mitigation measures.

A copy of the Ecological Impact Survey by ACS is attached as **appendix 4**.

6.2.6 Environmental Safeguards and Mitigation Measures

The project is not anticipated to have an adverse environmental impact.

The proposal has been located to minimise the disturbance required on vegetation and flora and fauna habitat. Although the proposed facility will require the removal of existing vegetation, these are not considered threatened or vulnerable species as reported by ACS and discussed under **section 6.2.5** of this REF document. The cleared area will be maintained at all times during the life of the facility. This is necessary to ensure that the facility and the adjacent areas are safe and secure. Amplitel and Telstra consider the removal of some local vegetation as essential but with minimal environmental disturbance.

The development will not induce any soil erosion or siltation. However, in order to mitigate siltation, the proposal will immediately reinstate all sediment that is temporarily extracted to install the required structural footings. No external soil or sediment will be introduced to the existing vegetation.

Radiofrequency Emissions and Health

Telstra would like to assure the public that it places a very high importance on electromagnetic energy (EME) safety. It relies on national and international experts such as the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) and the World Health Organisation (WHO) in relation to guidance on base stations and health. It is the responsibility of these expert authorities to continually review the science on electromagnetic energy (EME) and to protect public safety.

The current position of the WHO is available in the Online Q&A (updated 21 February 2020) the WHO state: “Studies to date provide no indication that environmental exposure to RF fields, such as from base stations, increases the risk of cancer or any other disease” <https://www.who.int/news-room/q-a-detail/what-are-the-health-risks-associated-with-mobile-phones-and-their-base-stations>.

ARPANSA’s position is: “Based on current research there are no established health effects that can be attributed to the low RF EME exposure from mobile phone base station antennas.” <https://www.arpana.gov.au/understanding-radiation/radiation-sources/more-radiation-sources/mobile-phone-base-stations>

All of Telstra’s mobile base stations are designed to comply with the relevant Australian safety standard called RPS S-1 or [Radiation Protection Series – S1 \(Standard for Limiting Exposure to Radiofrequency Fields – 100 kHz to 300 GHz\)](#). RPS S-1 is set by ARPANSA and is based on the safety guidelines recommended by the International Commission on Non-Ionising Radiation Protection (ICNIRP).

The ARPANSA Standard is designed to protect people of all ages and health status (including children) against all known adverse health effects from exposure to radio frequency electromagnetic energy (RF EME). Compliance with the ARPANSA Standard means that a site operating EME levels at 100% of the Standard, at a height of 1.5m from the ground, is considered safe by the Australian Federal Government.

This proposal will comply with the ACMA mandated exposure standard. Maximum EME levels from this facility will equate to **0.01%** of the standard.

It is worth noting that telecommunication facilities are designed to operate at minimum, not maximum, power levels at all times. The facility will only operate at a level necessary to accommodate the number of customers using the facility at any one time.

Accordingly, while EME levels from the facility cannot exceed **0.01%** of the standard, they will generally be much lower than this level. The ARPANSA EME report is attached for NSW NPWS' reference.

A copy of the ARPANSA EME report for this site can be found under **appendix 5** of this report.

6.2.7 Sustainability Measures – Including Choice of Materials and Water/Energy Efficiency

Amplitel and Telstra will use high quality materials that meet Australian Standards. All materials will be installed in the original colour and manufacturer's specifications. These are neutral in colour and made up of non-reflective materials. However, the materials can also be painted in a colour nominated by NSW NPWS, should it be required.

Telecommunications facilities are energy efficient as they are designed to operate at minimum, not maximum, power levels at all times. The facility will only operate at a level necessary to accommodate the number of customers using the facility at any one time.

There is no requirement to connect to water and sewerage access.

6.2.8 Construction Timetable and Staging and Hours of Operation

Construction works will be conducted between 7.00am and 5.00pm, Mondays to Saturdays or as per the recommended hours stipulated by NSW NPWS. Consultation with NSW NPWS and other relevant agencies will be undertaken throughout the construction process.

During the construction of the facility, a truck will be required to deliver necessary equipment to the site and a crane will be used to establish the facility. Traffic associated with the construction phase will be temporary in nature and will not affect existing traffic flows of the surrounding area. Should a road closure be required for the installation of equipment, the appropriate approvals will be obtained from NSW NPWS and/or relevant authorities.

7. Reasons for the Activity and Consideration of Alternatives

7.1 Objectives and Reasons for the Proposal

The overall objective of the proposed telecommunications facility is to provide new and upgraded mobile voice and internet network access to benefit employees, residents and visitors of Kosciuszko National Park or KNP. The area is a very well-known destination for both local and international tourists, especially during the winter season as it is host to many popular ski and snow resorts. However, the area has suffered with poor mobile phone network service for many years, which was exacerbated by bushfires in previous years. It is not only affecting businesses and its ability to employ a labour force, but it also is a safety a concern. Many areas within KNP are considered bushfire prone, including the host site.

Telecommunications is an essential service. Not only that it connects us to the rest of the world, but it also connects us to essential services, especially during times or disasters and emergencies. This is why Telstra has partnered with the Federal Government in ensuring rural local communities and destinations, such as Kosciuszko National Park, are provided with new and upgraded telecommunications network services.

When there is a reliable mobile phone service, emergency service providers, such as ambulance, fire, police and rescue, can respond in real time to help the local community. Government agencies can also relay the latest information and updates on disasters, which can help better prepare the community.

7.2 Consideration of Alternatives

Telstra applies a precautionary approach in selecting a site as a potential host for a telecommunications facility anywhere in Australia. This is done in accordance with the Mobile Phone Base Station Deployment Code C564:2020, Sections 4.1 – New Site Selection, Section 4.2 – Mobile Phone Radiocommunications Infrastructure Design and Section 4.3 – Site Operation, in accordance with the Deployment Code.

The site selection process commences with a search of potential sites that meet the network's technical requirements, with a view to also having the least possible impact on the surrounding area. Telstra applies and evaluates a range of criteria as part of this site selection process.

A detailed site assessment and feasibility review was undertaken as part of this proposal with due consideration given to a range of issues including but not limited to:

- Consistency with the applicable Commonwealth and State and Local planning policies and regulatory instruments,
- Minimal impact on the environment during the construction and operation of the facility,
- Avoiding known Areas of Environmental Significance or heritage listed sites or any sites of heritage significance,
- Meeting the radio frequency objectives of Telstra's networks by providing the required coverage,
- Satisfactory agreement with the landowner and their agreement to the proposal, and

- Opportunities for co-location with other existing telecommunications facilities/utility structures wherever possible. Telstra recognise this need and opt for colocation sites or sites with utility uses, when available.

Following the identification of the search area based on the necessary coverage objectives, suitable candidate sites were examined. Each identified candidate was assessed based on the ability to meet the coverage objectives and other site considerations including property, planning and engineering as outlined by the criteria above.

The below candidates (**figure 7**) were identified and assessed against environmental planning, community, property, engineering and radiofrequency (RF) objectives. The outcomes of the site selection process are outlined under **table 6**.



Figure 7: Candidates assessed through the site selection process.

Candidate	Address	Selection Outcomes
Nominal Location -36.346753°, 148.564899°	Adjacent to 8163 Kosciuszko Road Jimenbuen NSW 2628 (Lot 10, DP756710)	The nominal location provided by Amplitel and Telstra. It is located adjacent to the Kosciuszko Education Centre. It is considered highly visible as it is located along Kosciuszko Road.
Candidate A -36.351812°, 148.564364°	7693 Kosciuszko Road, Wilson's Valley NSW 2624 (Lot 30, DP725492)	Assessed as the highest number of premises within new handheld coverage and size of area to receive new handheld coverage. However, it is located very close to one of the park entrances and is expected to be visible when driving along Kosciuszko Road
Candidate B -36.353013°, 148.566437°	7693 Kosciuszko Road, Wilson's Valley NSW 2624 (Lot 30, DP725492)	Candidate B fails radiofrequency (RF) objectives and has no available connection to the network.

Candidate C -36.352270°, 148.566502°	7693 Kosciuszko Road, Wilson's Valley NSW 2624 (Lot 30, DP725492)	Similar to candidate B, candidate C fails radiofrequency (RF) objectives and has no available connection to the network.
Candidate D -36.34796°, 148.56759° Primary Candidate	Sawpit Creek Utilities Depot, Kosciuszko Road, Wilson's Valley NSW 2624 (previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627)	Preferred location by NSW NPWS. Candidate D is approximately 270m from the nominal, with a similar elevation and can meet all objectives, especially network coverage. This location can adequately provide service to the target areas and park offices and amenities surrounding the area.
Off-Park Candidate	N/A	No candidate outside the search area was selected as it will not be able to be able to provide network coverage to the target area.
Do Nothing Option	N/A	The community will continue to struggle with poor mobile network coverage. Safety in the area will become a concern as it will become more difficult to access emergency services such as ambulance, fire, police and rescue.

Table 6: List of candidates with selection outcomes.

7.3 Justification for Preferred Option

The preferred site candidate with coordinates -36.34796°, 148.56759°, located near Sawpit Creek Utilities Depot, Kosciuszko Road, Wilson's Valley NSW 2624 (previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627), was selected as the preferred site candidate for the following reasons:

- The proposed site location is appropriately situated to the area it seeks to provide service,
- The proposed land use is consistent with the setting and generally compatible with applicable town planning considerations, such as zoning, land use, environmental significance, compliance with the planning policies and regulatory requirements,
- The availability of viable connections to power and transmission networks situated in close proximity to the proposed site location,
- The location will offer a cost-effective site solution and opportunity for future co-location, whilst maximising coverage and mobile phone service provisions within the identified locality,
- Visual impact – the preferred location is situated with the community in mind. It is well-hidden from view but can still provide optimum network service. Whilst it needs to be close to the target area, it also needs to find the perfect balance between the need for network coverage and reduction in visual impact. The proposed structure is appropriate in height for its purpose and location and will complement its immediate surrounds. The facility will be installed in the original neutral colour based on manufacturer's specification, which allows the facility to blend with its surroundings naturally,

- Meeting the safe EME levels in accordance with the Australian standard set by RFNSA, and
- If required, this facility can be removed anytime, and the site restored to its former state with minimal disturbance to the environment.

The proposed facility will meet Telstra’s radio frequency objectives while satisfying construction feasibility, town planning considerations, environmental impacts, visual amenities, and engineering factors.

7.4 Site Suitability

Site Character	Not applicable. This section applies to a new lease or licence under s151 of the <i>NPW Act</i> . The proposed telecommunications facility is seeking a new licence agreement with NSW NPWS under s153D of the <i>NPW Act</i> .
Landscape Context	Not applicable. This section applies to a new lease or licence under s151 of the <i>NPW Act</i> . The proposed telecommunications facility is seeking a new licence agreement with NSW NPWS under s153D of the <i>NPW Act</i> .
Application of Site Suitability Matrix	Not applicable. This section applies to a new lease or licence under s151 of the <i>NPW Act</i> . The proposed telecommunications facility is seeking a new licence agreement with NSW NPWS under s153D of the <i>NPW Act</i> .
Strategic Site Assessment (if required by the matrix)	Not applicable. This section applies to a new lease or licence under s151 of the <i>NPW Act</i> . The proposed telecommunications facility is seeking a new licence agreement with NSW NPWS under s153D of the <i>NPW Act</i> .

Table 7: Development requirements for telecommunications infrastructure.

8. Description of the Existing Environment

8.1 Overview of the Project Area

Telstra is proposing to install a new telecommunications facility, consisting of a new 40-metre monopole, antennas and associated equipment, at a proposed new Amplitel compound at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624. Specifically, the proposed facility will be established within the vicinity of coordinates -36.34796°, 148.56759°.

The subject site is located within Kosciuszko National Park, approximately 260m east of the Kosciuszko Education Centre in an area called Sawpit Creek precinct. This precinct is an established area that provides storage and resource treatment for the municipal services team of KNP. It has been previously developed and heavily modified as it is used as an operational support precinct. Various amenities can be found in this precinct, which includes the campground, education centre and offices, car parks, landfill and a former service station. Park offices such as the Kosciuszko Education Centre and Kosciuszko Tourist Park, area also located near the host site. Further beyond Sawpit Creek precinct is protected land that makes up the rest of KNP.

The site of the proposed compound facility and the immediate surrounding areas are mostly flat with very little change in elevation. This site has been previously disturbed with most of the ground already cleared when existing facilities were established to provide the various amenities to KNP employees and visitors.

KNP contains significant biodiversity with known threatened species of flora and fauna, some of which may be threatened species. KNP is considered as a State and Territory Reserve and National Heritage Place under the *Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act)*. Strict environmental controls and legislation apply to most if not all areas of KNP. Although located within Kosciuszko National Park, the proposed host site is not considered as environmentally sensitive as it is already previously developed with the ground already disturbed.

An Ecological Impact Survey report organised through ACS Environmental concludes that the proposed development is not expected to impact any naturally occurring threatened ecological communities or any threatened native flora or fauna species.

A copy of the Ecological Impact survey by ACS is attached as **appendix 4**.

8.2 Natural Values

8.2.1 Geology, Geomorphology and Topography

As discussed in **section 8.1** above, the proposed location is mostly flat with very little change in elevation. The ground has been previously disturbed during the development of the operational park grounds and employee accommodation areas.

The area is also known to be Bushfire Prone. Amplitel is proposing to install and maintain a 10m Asset Protection Zone (APZ) around the proposed compound to protect the assets and equipment that make up the telecommunications facility. Some trees and vegetation will be removed, loped or trimmed as recommended by ACS in their report under **appendix 4** and discussed under **section 3.1.4** of this document. The APZ will be maintained throughout the life of the facility to mitigate bushfire damage to the proposed compound and equipment.

8.2.2 Soil Types and Properties (Including Contamination)

Not applicable. The subject site is not identified to be contaminated land.

8.2.3 Watercourses, waterbodies and Wetlands (including their Catchment Values)

Not applicable. The subject site is not located within or near watercourses, waterbodies and wetland and catchments.

8.2.4 Coasts and Estuaries

Not applicable. The subject site is not located within or near coasts or estuaries.

8.2.5 Biodiversity

Overview of Terrestrial and Aquatic Biodiversity

The Ecological Impact Survey report organised through ACS provides a summary of the terrestrial and aquatic biodiversity found within and around the subject site at Kosciuszko National Park.

ACS writes, the vegetation community that can be found in the locality include “some small tussocks of *Poa labillardierei* and *Juncus phaentus* occur in the patch of mostly exotic grassland, with small individuals of Snow Gum (*Eucalyptus pauciflora*) forming a low woodland to the north-east, north, north-west and west of the cleared grassland.” Other tussock species found include Snowgrass (*Poa sieberiana*) and *Carex gaudichaudiana* in cleared areas, and *Viola hederacea*, *Monotoca scoparia*, *Lomandra longifolia*, *Craspedia* sp and Blackwood (*Acacia melanoxylon*) occur within wooded areas.

In terms of animal species, ACS reports that there were common mammalian species observed on site including the Eastern Grey kangaroo, pretty Face Wallaby and Wallaroo, Rabbit, Wood Duck, Australian Raven, Black Duck, Kookaburra, Willy Wagtail and Red Wattle Bird.

None of the individual species recorded within the construction footprint of the facility and APZ are rare or threatened species.

No aquatic biodiversity is reported as the site is located inland.

The report provided by ACS is supported by a site visit and inspection of the host site on 18 December 2023.

A full copy of said report is available under **appendix 4**.

Areas of Outstanding Biodiversity Value or Critical Habitat

This section does not apply to the proposal. No areas of outstanding biodiversity value or critical habitat reported within the host site.

Environmental Assets of Intergenerational Significance (AIS)

This section does not apply to the proposal. No areas of Environmental Assets of Intergenerational Significance reported within the host site.

Threatened Ecological Communities

The 'Kosciuszko Eastern Slopes Mountain Gum Forest' or PCT 3382 (DPE 2023) is the ecological plant community occurring at the subject site. However, ACS clarifies that there are No Threatened Ecological Community (TEC) associated with this PCT.

It is not listed as a threatened ecological community on either registers of the BC Act (2016) or the Commonwealth EPBC Act (1999). ACS provides a description of PCT 3382:

“This PCT is found from Rams Head Range north to Providence Portal, Mount Nattung and Brindabella Range, and east to Booroomba Rocks and Mount Clear. It commonly occurs on shallow rocky soils derived from granitic or hard sedimentary (sandstone, chert) rocks, often on steep exposed slopes,

at elevations of generally 1000-1600 metres asl, with means of 740-1400 mm rainfall and 30-90 frost days annually.

A mid-dense canopy almost always includes *Eucalyptus pauciflora*, very frequently with *Eucalyptus dalrympleana*. The diverse mid-stratum commonly includes *Daviesia mimosoides*, *Hibbertia obtusifolia* and *Persoonia chamaepeuce* with occasional scattered *Brachyloma daphnoides*, *Exocarpos strictus*, *Pimelea linifolia*, *Lomatia myricoides*, or patches of *Acacia dealbata*.

The ground layer is very frequently dominated by tussocks of *Poa sieberiana*, commonly with *Lomandra longifolia*, *Stellaria pungens*, *Goodenia hederacea*, *Viola betonicifolia*, *Gonocarpus tetragynus* and *Stylidium graminifolium*."

Threatened Species and Populations

A total of nine (9) threatened fauna species have been recorded within a 5km radius of the proposed telecommunications compound however, none have been recorded within one (1) km of the subject site. ACS notes that these species are highly mobile, and none would be impacted by the proposal.

Family	Common name	Scientific name	NSW status	Comm. status	No. of records
Aves Accipitridae	Little Eagle	<i>Hieraetus morphnoides</i>	V,P		2
Cacatuidae	Gang-gang Cockatoo	<i>Callocephalon fimbriatum</i>	V,P,3	E	4
Meliphagidae	White-fronted Chat	<i>Epthianura albifrons</i>	V,P		2
Artamidae	Dusky Woodswallow	<i>Artamus cyanopterus cyanopterus</i>	V,P		5
Petroicidae	Scarlet Robin	<i>Petroica boodang</i>	V,P		3
	Flame Robin	<i>Petroica phoenicea</i>	V,P		6
Mammalia Burrmyidae	Eastern Pygmy-possum	<i>Cercartetus nanus</i>	V,P		1
Vespertilionidae	Eastern False Pipistrelle	<i>Falsistrellus tasmaniensis</i>	V,P		3
Miniopteridae	Large Bent-winged Bat	<i>Miniopterus orianae oceanensis</i>	V,P		2

Table 8: List of 9 threatened fauna species recorded within 5kms of the site in the last 20 years (From ACS report).

8.3 Cultural Values

8.3.1 Aboriginal and Cultural Heritage

This section does not apply. There is no known Aboriginal Cultural Heritage located at the subject site and within an area of approximately 200m around the proposed telecommunications facility. Please refer to **figure 9** below and **appendix 3** for the Aboriginal Heritage Information Managements System (AHIMS) report generated for the subject site.

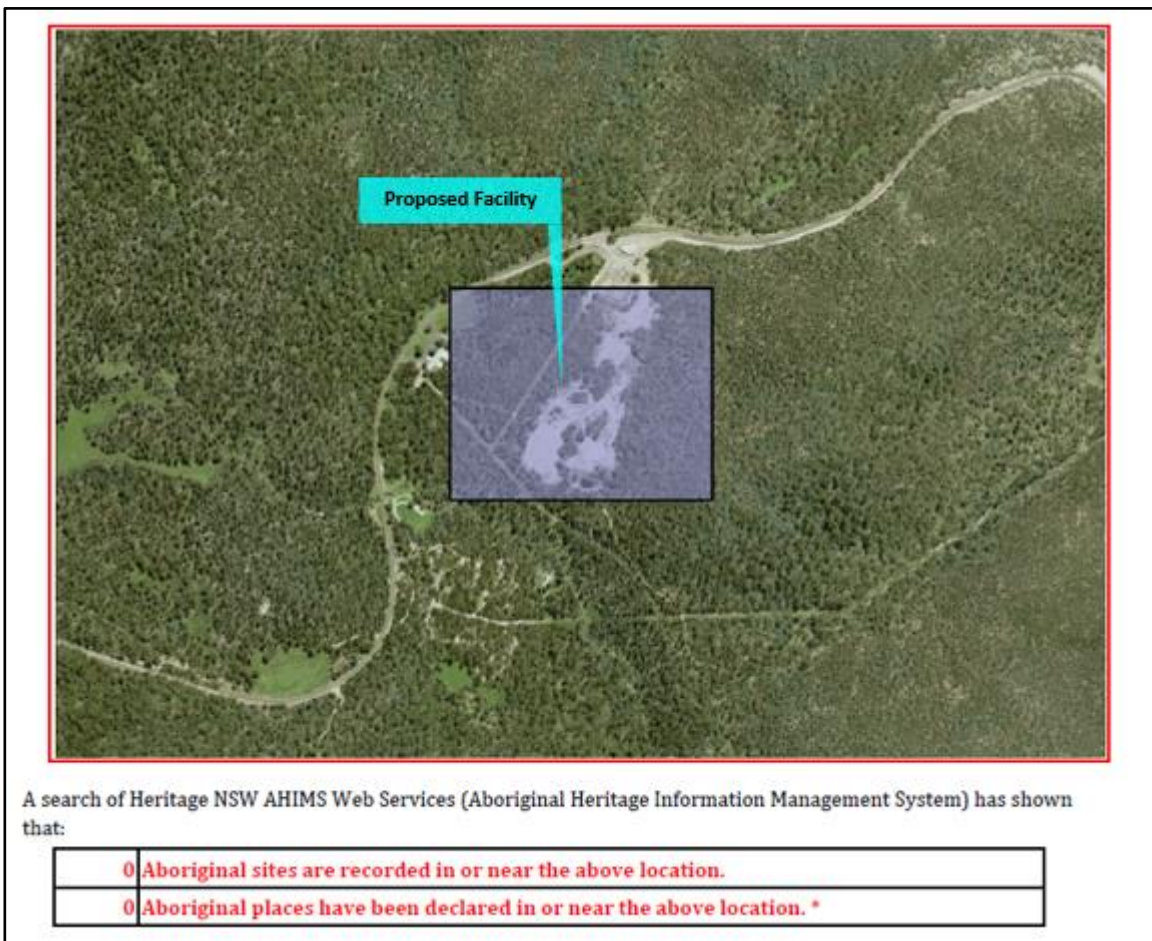


Figure 8: AHIMS report showing an approximate 200-metre search area around the subject site. (Source: AHIMS portal).

8.3.2 Historic Heritage Value

The information generated by the EPBC Protected Matters Search report (EPBC Report) identifies the host site to be located within two (2) National Heritage Places, which are considered as having natural, historic and Indigenous places of outstanding significance to the nation:

- Snowy Mountains Scheme (Place ID 105919), and
- Australian Alps National Parks and Reserves (105891).

However, ACS comments:

“The impact on the very small area of mostly cleared exotic grassland surrounded on its north and west sides by a low woodland of stunted individuals of Snow Gum (Figure 5) is not considered to have a significant impact on the integrity of the Kosciuszko National Park, relative to associated adjacent areas which have been cleared in the recent past for National Parks stockpile, roads, parking and shed structures.”

8.4 Social Values

8.4.1 Recreational Values

The 2006 Plan of Management of Kosciuszko National Park or *Plan* (as amended in 2010, 2014 and 2021) identifies the Kosciuszko Education Centre at Sawpit Creek as one of the significant locations of KNP. Most visitors to KNP will head straight to a Visitor Centre as a main entry point before heading out to their intended destination. The Education Centre is considered as one of these main entry points.

Placing the proposed telecommunications facility near the Education Centre ensures that guests of the park as well as employees will have access to fast and reliable mobile phone network service.

8.4.2 Scenic and Visually Significant Areas

Although the entire Kosciuszko National Park is considered as environmentally sensitive, the *Plan* describes the Visitor Services Zones as areas that are 'highly modified and impacted parts' of the park. Since most of the park facilities are located near or within the Visitor Services Zones, these areas have been developed with the ground already disturbed when the facilities were built. This is very evident at the host site as it is not only located near a designated Visitor Services Zone, but also adjacent to the existing village accommodation for park employees.

Despite of development in the area, the subject site is still considered well-hidden from the rest of the park as the area is still surrounded by untouched, mature and tall trees that provide screening at many different vantage points. The proposed facility is not located from visitor walking paths and is only usually accessed by park employees.



Figure 9: Kosciuszko Education Centre viewed from Kosciuszko Road. (Source: Google Street View).

The proposed facility will be established approximately 260m behind the Kosciuszko Education Centre, pictured above along Kosciuszko Road. At this distance, it is anticipated that the trees behind the centre will provide sufficient visual camouflage to the facility from being seen by the general public. There is a possibility that the top of the facility may be seen at certain locations, such as above mentioned, however, the proposal is not expected to have an overall adverse visual impact.

By nature, telecommunications facilities are required to reach a certain height to be able to provide the necessary service. In the case of this proposal, the steel pole will reach an approximate overall height of 44 metres from ground level up to the apex of the proposed antennas. It is assessed as the shortest structure capable of providing the optimal level of service for this location.

The host site is located in a predominantly rural setting. The pole will be visible at some locations and Telstra recognises the sensitivity associated with proposals in rural areas, especially within a National Park. However, it is important to find a balance between providing essential services and minimising impact on the community and the environment.

Telecommunications facilities are an essential service that are present in any community. For rural and secluded areas such as KNP, it does not only provide mobile voice and network connectivity but also access to vital emergency services.

Specific design elements have been included within the planning of the proposed facility include:

- Using a monopole instead of the traditional bulkier lattice tower or mast,
- Limiting the height of the monopole structure at 40 metres. This height will ensure that the best level of coverage can be provided to the local area, without constructing to an extreme height that has no added benefit to service the area,
- Various equipment will be housed within the proposed Telstra equipment shelter. This is to minimise the bulk and scale of the proposal in context to the surrounding environment, and
- The siting and location of the proposal have been taken into consideration during the site selection process in order to ensure that the facility is located in an area that can provide the best service as opposed to a farther location but increasing the height of the pole.





Figure 10 (previous page) and **Figure 11** (above photo): Before and after montage of the proposed telecommunications facility facing south and northwest respectively towards the subject site.

The images above show before and after montages of the subject site showing how the facility would appear once it is built. This image was taken facing south and northwest towards the proposed compound area.

8.4.3 Education and Scientific Values

The ecological impact survey completed by ACS reports that although some vegetation are recommended for removal and/or trimming, the proposed telecommunications facility will not impact any naturally occurring threatened ecological communities or any threatened native flora or fauna species.

The proposed development will not affect the overall education and scientific value of the park.

8.4.4 Interests of External Stakeholders

In consideration of the interests of external stakeholders, including the general public, a consultation process was conducted between 7 February to 14 March 2024. This is discussed in detail under **section 4** of this REF document.

During this period, one (1) submission was received from an Officer of KNP Educational Centre. Her enquiry relates to the location of the proposed facility. No other enquiries or submissions were received.

8.5 Matters of National Environmental Significance

The proposed telecommunications facility is reported to contain the following Matters of National Environment Significance that are protected under the *EPBC Act*:

National Heritage Places (2)

- Snowy Mountains Scheme (Place ID 105919), and
- Australian Alps National Parks and Reserves (105891).

Comment:

ACS advises in its Ecological Impact Survey report that proposed telecommunications facility has no significant impact on the integrity of the Kosciuszko National Park, as the subject site has been mostly cleared with very minimal disturbance relative to the size of KNP.

Listed Threatened Ecological Communities (3)

- Alpine Sphagnum Bogs and Associated Fens
- Natural Temperate Grassland of the Southeastern Highlands
- White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland

Comment:

ACS considers that that no naturally occurring threatened ecological communities, or any threatened native flora or fauna species will be impacted by the proposed works at the subject site.

Listed Threatened Species (41)

A full list of the forty-one (41) listed threatened species can be seen in the EPBC Report under ***appendix 2***.

Comment:

The ACS report considers that “no naturally occurring threatened ecological communities, or any threatened native flora or fauna species will be impacted by the proposed works at the subject site.”

None of the listed species in this category were observed during the search conducted onsite during site inspection on 18 December 2023. However, one threatened flora species has been documented for the locality of the subject development area. This species is the Blue-tongued Greenhood (*Pterostylis oreophila*) which was recorded to have been seen in 2022, about 9kms northwest of the proposed site.

Listed Migratory Species (10)

A full list of the ten (10) listed migratory species can be seen in the EPBC Report under ***appendix 2***.

Comment:

The EPBC report indicates ten (10) migratory species found near or within the subject site. However, ACS reports a total of nine (9) threatened fauna species recorded within a 5km radius of the proposed telecommunications compound. Nonetheless, none of these species have been recorded within one (1) km of the subject site. ACS notes that these species are highly mobile, and none would be impacted by the proposal.

Listed Marine Species (15)

A full list of the fifteen (15) listed marine species can be seen in the EPBC Report under ***appendix 2***.

Comment:

The proposed telecommunications facility will not affect any listed marine species.

9. Impact Assessment

9.1 Physical and Chemical Impacts During All Stages of the Activity

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. impact on soil quality or land stability?	<input checked="" type="checkbox"/>	Negligible	The location of the host site is mostly flat with very little change in elevation within its immediate area. Excavation will only take place within the footprints of the proposed facility. The proposed works will not affect land stability in the area.	No significant ground disturbance will be proposed or required – ground works will be required only for the foundations for the pole, equipment cabinet platform, and for trenching associated with power and fibre cabling. No soil elements will be brought in from outside KNP that will impact the soil quality in the area.
2. affect a waterbody, watercourse, wetland or natural drainage system – either physically or chemically (e.g. due to runoff or pollution)?	<input type="checkbox"/>	N/A	Does not apply. The facility does not produce any waste or chemicals that can affect any nearby body of water.	N/A
3. change flood or tidal regimes, or be affected by flooding?	<input type="checkbox"/>	N/A	Does not apply. The proposed facility is not located in a flood prone area.	N/A
4. affect or be affected by coastal processes and coastal hazards, including those under climate change projections (e.g. sea level rise)?	<input type="checkbox"/>	N/A	Does not apply. The proposed facility is not located in a coastal area and thus, is not affected by climate change projections such as sea level rise.	N/A

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
5. involve the use, storage or transport of hazardous substances, or use or generate chemicals which may build up residues in the environment?	<input type="checkbox"/>	N/A	Not applicable. The telecommunications facility will not use, store or transport hazardous substances.	N/A
6. involve the generation or disposal of gaseous, liquid or solid wastes or emissions?	<input checked="" type="checkbox"/>	Negligible	The proposed telecommunications facility will not generate or dispose any gaseous, liquid or solid wastes. However, based on the EME report for this site, it will produce emissions not more than 0.01% of the Standard. Please refer to section 6.2.6 of this document.	The expected EME emissions are negligible compared to the Standard of 100%. The proposal will comply with the ACMA mandated exposure standard.
7. involve the emission of dust, odours, noise, vibration or radiation?	<input checked="" type="checkbox"/>	Negligible	The proposed telecommunications facility will not emit dust, odours, or vibration. However, based on the EME report for this site, it will produce emissions not more than 0.01% of the Standard. Please refer to section 6.2.6 of this document.	The expected EME emissions are negligible compared to the Standard of 100%. The proposal will comply with the ACMA mandated exposure standard.

9.2 Biodiversity Impacts During All Stages of the Activity

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. affect any declared area of outstanding biodiversity value or critical habitat or environmental asset of intergenerational significance?	<input checked="" type="checkbox"/>	Negligible	The Ecological Impact Survey concludes that the proposed works are not expected to impact any naturally occurring threatened ecological communities or any threatened	Choosing a site that has been previously developed with the ground already disturbed. This ensures the protection and conservation of undeveloped and untouched reserved land within

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
			native flora or fauna species under the <i>Biodiversity Conservation Act 2016 (BC Act)</i> .	Kosciuszko National Park where outstanding biodiversity is present.
2. result in the clearing or modification of vegetation, including ecological communities and plant community types of conservation significance? ^	<input checked="" type="checkbox"/>	Negligible	Some vegetation removal is required to establish and maintain the proposed facility and APZ however, it is considered to have no significant impact relative to the size of Kosciuszko National Park.	A pre-clearance Ecological Impact Survey was done to analyse the impact of the proposal to the subject site and Kosciuszko National Park as a whole. Other mitigation measures include checking vehicles and machinery before and after leaving the site and cleaning them from debris if necessary.
3. endanger, displace or disturb terrestrial or aquatic fauna, including fauna of conservation significance, or create a barrier to their movement? ^	<input checked="" type="checkbox"/>	Negligible	There are noted threatened fauna species within 5kms of the subject site however, none are known to occur within the immediate area of the site. The Ecological Impact Survey notes these species are highly mobile as they constantly move around and thus, will not be impacted by the proposal.	Choosing a site that has been previously developed with the ground already disturbed. This ensures the protection and conservation of undeveloped and untouched reserved land within Kosciuszko National Park. Adopting measures proposed by the Ecological Survey in ensuring the development has very little to no impact to the surrounding areas.
4. result in the removal of protected flora or plants or fungi of conservation significance? ^	<input checked="" type="checkbox"/>	Negligible	Although the proposed facility will require the removal of existing vegetation, these are not considered threatened or vulnerable species as reported by ACS and discussed under section 6.2.5	Adopting measures proposed by the Ecological Survey in ensuring the development has very little to no impact to the surrounding areas.

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
6. contribute to a key threatening process to biodiversity or ecological integrity?	<input type="checkbox"/>	N/A	The Ecological Impact Survey concludes that the proposed works are not expected to impact any naturally occurring threatened ecological communities or any threatened native flora or fauna species.	N/A
7. introduce weeds, pathogens, pest animals or genetically modified organisms into an area?	<input checked="" type="checkbox"/>	Low	Weeds can be brought onto site by vehicles from other areas. This can occur on every site visit such as site inspection, during construction and when the site needs upgrade or maintenance. However, this can be avoided by strictly adhering to site access agreement.	Vehicles accessing the site will only use access points and roads specified by NPWS. A pre-entry wash down of all vehicles and equipment prior to entering the park is advised. It is proposed that tyres of vehicles will be brushed down or run through a dip of disinfectant to sterilise any weed seed species. If needed, the nearest commercial cash wash is at Cooma. Weed removal on site is also recommended to ensure spreading of weeds is minimised.

9.3 Community Impacts During All Stages of the Activity

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. affect community services or infrastructure?	<input checked="" type="checkbox"/>	Positive	It will positively impact community services and infrastructure as it will vastly improve mobile communication inside the park.	The facility can be removed any time if required and the site returned to its original state.
2. affect sites important to the local or broader community for their recreational or other values or access to these sites?	<input checked="" type="checkbox"/>	Positive	The facility will provide a positive benefit to employees and visitors of the park by providing fast and reliable mobile phone network connectivity.	Choosing a site that can reach an optimum number of operational areas of the park.
3. affect economic factors, including employment, industry and property value?	<input checked="" type="checkbox"/>	Positive	The introduction of upgraded and new mobile phone network service will attract more visitors to park areas, which will lead to an increase in economic benefits while still keeping other protected areas of the park safe from further damage.	Choosing a site that is near areas that can provide the best service to park visitors and employees.
4. have an impact on the safety of the community?	<input checked="" type="checkbox"/>	Positive	Park employees and visitors can access mobile phone network coverage in times of emergencies, which will enhance safety inside the park.	The facility can be removed any time if required and the site returned to its original state.
5. cause a bushfire risk?	<input checked="" type="checkbox"/>	Negligible	The proposed facility and equipment will not initiate fires or become a bushfire risk.	Materials used are not flammable and will not initiate bushfires. A 10-metre 10m Asset Protection Zone (APZ) around the proposed compound to minimise risk from bushfires will be maintained throughout the life of the facility.

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
6. affect the visual or scenic landscape? ^	<input checked="" type="checkbox"/>	Low	The facility may be seen from certain vantage points by virtue of its height. However, the facility is surrounded by mature and thick trees that provide a natural camouflage to the host site.	The chosen location is well-hidden from public view but close enough to be able to provide much needed mobile phone coverage. The host site is normally accessed by park employees and away from public view.

9.4 Natural Resource Impacts During All Stages of the Activity

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. result in the degradation of the park or any other area reserved for conservation purposes?	<input checked="" type="checkbox"/>	Positive	The proposal will promote already developed designated visitor centres and areas of the park. The introduction of fast and reliable mobile phone service in these areas will further enhance visitor experience.	The host site is part of an already developed area that may be otherwise unusable. Placing the facility in an already developed area will ensure the protection and conservation of undeveloped and untouched reserved land.
2. affect the use of, or the community's ability to use, natural resources?	<input checked="" type="checkbox"/>	Negligible	The facility will not affect or prohibit the ability to use natural resources by the community.	The host site is part on area that has been previously developed. It is currently vacant and not being used. Hosting the facility at this location will enable the use of vacant land to benefit the community.
3. involve the use, wastage, destruction or depletion of natural resources including water, fuels, timber or extractive materials? ^	<input checked="" type="checkbox"/>	Negligible	The facility will involve the use, wastage, destruction, depletion of natural resources.	Choosing a vacant land that has been previously developed with otherwise very little use and natural resources to offer over untouched, protected areas of KNP.

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
4. provide for the sustainable and efficient use of water and energy? [†]	<input checked="" type="checkbox"/>	Positive	<p>The proposed development will not use water.</p> <p>It also is very efficient in energy use as it powers down during times of lesser demand and use, such as during evening or when the numbers of users go down.</p>	The facility will power down during times when less demand is needed.

9.5 Aboriginal Cultural Heritage Impacts During All Stages of the Activity

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. disturb the ground surface or any vegetation likely to contain culturally modified trees?	<input checked="" type="checkbox"/>	Negligible	The area has been previously disturbed with previous developments. Ground works will be required only for the foundations for the pole, equipment cabinet platform, and for trenching associated with power and fibre cabling.	Due diligence search for known Cultural and Aboriginal Heritage, threatened and endangered species search, and protected matters. None found on site. However, should any significant item of environmental significance or Aboriginal and cultural heritage be found on site, work will stop, and the proper authorities will be contacted.
2. affect or occur near known Aboriginal objects, Aboriginal places or an Aboriginal cultural asset of intergenerational significance? If so, can impacts be avoided? How?	<input checked="" type="checkbox"/>	Negligible	There is no known Aboriginal Cultural Heritage located at the subject site and within an area of approximately 200m around the proposed telecommunications facility based on the AHIMS report. Refer to section 8.3.1 of this document and appendix 3 .	In the event that any significant Aboriginal Cultural item is found during construction, the build team will stop any works and notify relevant authorities. Work will only resume once it is permitted.

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
3. affect areas: - within 200 m of waters - within a sand dune system - on a ridge top, ridge line or headland - within 200 m below or above a cliff face - in or within 20 m of a cave, rock shelter or a cave mouth? If so, can impacts be avoided? How?	<input checked="" type="checkbox"/>	Negligible	The site is located in a mostly flat and levelled area, away from any significant body of water, sand dunes, ridge top, cliff or cave.	Choosing a site that has very little challenges in topography also ensures that the network service can reach an optimum number of users.
4. affect wild resources which are used or valued by the Aboriginal community or affect access to these resources?	<input checked="" type="checkbox"/>	Negligible	The facility will not use resources that are valued by the Aboriginal community.	There are no Aboriginal Cultural Heritage items and places located within at least 200m from the site according to the AHIMS search. However, should any significant item of environmental significance or Aboriginal and cultural heritage be found on site, work will stop, and the proper authorities will be contacted.
5. affect access to culturally important locations?	<input checked="" type="checkbox"/>	Negligible	The development will not affect access to culturally important locations.	There are no Heritage items, places or areas located within the proposed compound area as per searches through the NSW Planning Portal. The site is located within Kosciuszko National Park (National Heritage) however, the proposal will not affect the overall integrity of KNP because of its size.

9.6 Other Cultural Heritage Impacts During All Stages of the Activity

Is the proposed activity likely to...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. affect or occur near places, buildings or landscapes of heritage significance? ^	<input checked="" type="checkbox"/>	Negligible	The development will not affect places, buildings or landscapes of heritage significance as it is taking place in an area already previously developed.	The site is located within Kosciuszko National Park (National Heritage) however, there are no Heritage items, places, buildings or landscapes located within the proposed compound area. The subject site has been mostly cleared with very minimal expected disturbance to KNP, relative to its size.
2. impact on relics or moveable heritage items, or an area with a high likelihood of containing relics? ^	<input type="checkbox"/>	N/A	There are no known relics or moveable heritage items on site.	A search for heritage items was conducted during the site selection process.
3. impact on vegetation of cultural landscape value (e.g. gardens and settings, introduced exotic species, or evidence of broader remnant land uses)?	<input type="checkbox"/>	N/A	There are no known vegetation of cultural landscape value found on site.	A search for heritage items was conducted during the site selection process.

9.7 Impacts on Matters of National Environmental Significance under the Environment Protection and Biodiversity Conservation Act During All Stages of the Activity

Is the proposed activity likely to affect MNES, including:	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. listed threatened species or ecological communities)?	<input checked="" type="checkbox"/>	Negligible	The proposed development is not expected to impact any naturally occurring threatened ecological communities or any threatened native flora or fauna species.	Organising an Ecological Survey to assess the impact of the proposal to its surrounds. Appropriately responding to the outcomes of the survey (i.e. considering other sites if the host site has a negative impact).
2. listed migratory species?	<input checked="" type="checkbox"/>	Negligible	Migratory species known to occur within the area are considered highly mobile, and none would be impacted by the proposal.	Organising an Ecological Survey to assess the impact of the proposal to its surrounds. Appropriately responding to the outcomes of the survey (i.e. considering other sites if the host site has a negative impact).
3. the ecology of Ramsar wetlands?	<input type="checkbox"/>	N/A	Not located in a Ramsar wetlands area.	N/A
4. world heritage values of World Heritage properties?	<input type="checkbox"/>	N/A	Not located in a World heritage area.	N/A
5. the national heritage values of national heritage places?	<input checked="" type="checkbox"/>	Negligible	The proposed telecommunications facility has no significant impact on the integrity of the Kosciuszko National Park, as the subject site has been mostly cleared with very minimal disturbance relative to the size of KNP.	A pre-clearance Ecological Impact Survey was done to analyse the impact of the proposal to the subject site and Kosciuszko National Park as a whole. Other mitigation measures include checking vehicles and machinery before

Is the proposed activity likely to affect MNES, including:	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
				and after leaving the site and cleaning them from debris if necessary.

9.8 Cumulative Impacts During All Stages of the Activity

The proposed host site is located in an area that has been previously developed, mostly to house various park offices and establishments in support of park employees and visitors to Kosciuszko National Park. By choosing an area that has already been disturbed, the proposal can protect the overall health of KNP. It is anticipated that the proposed new telecommunications facility will provide a wealth of benefits to all employees, residents and visitors of the park.

When considered with other projects, is the proposed activity likely to affect...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
1. natural landscape or biodiversity values through cumulative impacts?	<input checked="" type="checkbox"/>	Negligible	The proposed telecommunications facility has no significant impact on the integrity of the Kosciuszko National Park, as the subject site has been mostly cleared with very minimal disturbance relative to the size of KNP.	A pre-clearance Ecological Impact Survey was done to analyse the impact of the proposal to the subject site and Kosciuszko National Park as a whole. Other mitigation measures include checking vehicles and machinery before and after leaving the site and cleaning them from debris if necessary.
2. cultural (Aboriginal, shared and historic heritage) values through cumulative impacts?	<input type="checkbox"/>	N/A	There are no Aboriginal Cultural Heritage items and places located within at least 200m from the site according to the AHIMS search.	Note: Should any significant item of environmental significance or Aboriginal and cultural heritage be found on site, work will stop, and the proper authorities will be contacted.

When considered with other projects, is the proposed activity likely to affect...	Applicable?*	Impact level	Reasons	Safeguards/mitigation measures
3. social (amenity, recreation, education) values through cumulative impacts?	<input checked="" type="checkbox"/>	Positive	The proposed telecommunications facility will provide a positive impact on the social values of KNP as it will provide upgrade mobile network service that can benefit all users in the area.	The facility is designed in a way that it can be removed anytime, and the site restored to its former state with minimal disturbance to the environment.
4. the community through cumulative impacts on any other part of environment (e.g. due to traffic, waste generation or perceived over-development?)	<input checked="" type="checkbox"/>	Positive	The proposed telecommunications facility will provide a positive impact on the overall environment of KNP by promoting the use of land that would otherwise be of no use.	Using an already developed section of the park versus areas that are untouched and relatively intact.

10. Proposals Requiring Additional Information

10.1 Lease or Licence Proposals Under s151 National Parks and Wildlife Act

Proponents must complete and submit a **sustainability assessment** together with the REF. Under NPWS policy this requirement **also** applies where NPWS is the proponent for projects of the kind listed in [s 151A](#) of the NPW Act.

For information on the sustainability assessment criteria and guidelines, including assessment templates, go to the [Sustainability assessments page](#).

Indicate which sustainability assessment is attached:

- special activities or uses involving more than 400 people
– Sustainability Assessment **Template 2**
- built structures and facilities
– Sustainability Assessment **Template 3**.

Not applicable. This section applies to a new lease or licence under s151 of the *NPW Act*. The proposed telecommunications facility is seeking a new licence agreement with NSW NPWS under s153D of the *NPW Act*.

10.2 Telecommunications Facilities

10.2.1 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?	Several candidates were considered as a host site for this proposal, as discussed under section 7.2 of this REF document. However, they are all within reserve land under the NPW Act. Selecting a host site outside reserve land will not allow the proposed telecommunications facility to provide service to the intended network area.
2. Does the site of any aboveground facility cover the minimum area possible?	Yes, the proposed new Amplitel compound at 61.61m ² is the appropriate size to host the new Telstra telecommunications facility.
3. Is the facility to be designed and constructed to minimise risk of damage to the facility from bushfires?	Yes, Amplitel will install and maintain a 10 metre Asset Protection Zone around the new facility compound to minimise risk from bushfires. It will be maintained throughout the life of the facility.

Factors requiring consideration	Response
4. Has the site and construction of the facility been selected to, as far as practicable, minimise visual impact?	Yes, the host site is located in an area where it is well-hidden from the general community but still able to provide optimum network service.
5. Is it feasible to use an existing means of access to the site?	Yes, there is an existing access road to reach the site including the use of vehicles. There is no requirement to build a new access route or road.
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, the mobile network service in the area is very poor and intermittent. The establishment of new and upgraded mobile phone network service in the area will provide a benefit to park employees and visitors.
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, should it be required, the telecommunications facility can be removed anytime, and the site restored to its former state with minimal disturbance to the environment.
8. Has the site been selected after taking into account the objectives set out in any plan of management relating to the land?	Yes, the objectives of the 2006 Plan of Management of Kosciuszko National Park. The proposed telecommunications facility will be established in an appropriately zoned area under the Plan that has already been previously disturbed with established structures. This will ensure that untouched areas or wilderness areas of the KNP will remain protected.
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: <input type="checkbox"/> the proponent will be the owner of the facility <input type="checkbox"/> the proponent will be a co-user of the facility.	No co-location opportunities available in the area. However, the new telecommunications facility will be established in an area of the Park that has been previously disturbed with the development of the various park offices in the area. There will be minimal ground disturbance at the proposed host site.

Table 9: Matters under section 153D of the NPW Act.

10.2.2 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

Yes

No, this is a new site. An APZ is proposed to be established together with the proposed facility.

2. Does the activity's scope include establishment of an APZ consistent with the RFS Practice Note?

No

Yes

Yes, Amplitel will install a new APZ.

3. If the proposed facility will not have an APZ consistent with the RFS Practice Note, has consultation occurred with the RFS?

The subject site is located in a Bushfire Prone Area. Amplitel is proposing a 10.0m Asset Protection Zone or APZ around the facility as part of the proposed development to ensure the protection of the proposed compound and all equipment from bushfires. The host site has already been previously cleared of vegetation however, some existing trees, shrubs and other vegetation inside the proposed APZ needs to be cleared.

Please refer to **section 3.1.4** of this REF document for a full discussion regarding the APZ.

10.3 Activities within Sydney Drinking Water Catchment

This section does not apply. The proposed telecommunications facility is not located within the Sydney Drinking Water Catchment.

10.4 Activities in River Murray Riverine Land

This section does not apply as the proposed activity is not located within the River Murray Riverine land area.

11. 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

Environmental factor	Consideration	Significance of impact*
(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
(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

Environmental factor	Consideration	Significance of impact*
(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

Table 10: Summary of Impacts and Conclusions.

In conclusion indicate if:

- There is likely to be a significant effect on the environment and an environmental impact statement is required
 - No
 - Yes

Reason(s):

The proposed telecommunications facility will be established in an area that has been previously disturbed when existing park facilities were established to provide accommodation and amenities to residents and staff of KNP. It is anticipated that there is no significant effect on the environment and therefore, an environmental impact statement is not required.

- There is likely to be a significant effect on threatened species, populations, ecological communities or their habitats and a species impact statement is required
 - No
 - Yes

Reason(s):

No naturally occurring threatened ecological communities or any threatened native flora or fauna species will be impacted by the proposed works at the subject site.

- The activity is likely to have a significant impact on matters of national environmental significance listed under the Cwth Environment Protection and Biodiversity Conservation Act

No

Yes

Reason(s):

The proposed development has no significant impact in relation to matters of environmental significance listed under the EPBC Act (1999) at the proposed site. The subject site has been mostly cleared with the ground already disturbed from previous developments. The proposed works are expected to have very minimal disturbance to the area, relative to the size of Kosciuszko National Park. The proposed works will be strictly undertaken with the recommended mitigation measures.

- The activity will 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](#)

No

Yes

The installation of a new telecommunications facility with an amount above the threshold of \$200,000 requires certification in accordance with NPWS's [Construction Assessment Procedures](#).

Conclusion

This Review of Environmental Factors (REF) document has been submitted to the NSW National Parks & Wildlife Service (NSW NPWS) for assessment and review of the proposed new Telstra telecommunications facility within a new Amplitel compound at Sawpit Creek Utilities Depot, Kosciuszko Road, Wilsons Valley NSW 2624 (previously known as 8163 Kosciuszko Road, Kosciuszko National Park NSW 2627).

Amplitel and Telstra believe that a new telecommunications facility at this location, capable of providing superfast 4G and 5G mobile phone network data and voice connectivity, will positively impact the local environment and community. Not only that it will enhance visitor experience at various park visitor centres, but it will also provide essential services such as ambulance, fire, police and rescue, if needed.

By choosing to establish the proposed telecommunications facility in an area that has been disturbed by previous developments, we are ensuring further protection of undeveloped and untouched reserve lands within Kosciuszko National Park.

Amplitel and Telstra are therefore requesting for NSW NPWS to consider the proposed telecommunications facility and recommend the new compound licence agreement under section 153D of the *NPW Act*, including the associated underground fibre connection by Telstra Infracore.

12. Supporting Documentation/Appendix

Please provide details of documentation included with this application.

Document Title	Author	Date
1. Proposal and Survey Plans	Genus Pty Ltd	19/03/2024
2. EPBC Act Protected Matters Report	Archie Aparicio	08/11/2023
3. AHIMS Report	Archie Aparicio	01/02/2024
4. ACS Ecological Impact Survey Report	ACS Environmental Pty Ltd	25/01/2024
5. ARPANSA EME Report	Genus Pty Ltd	05/02/2024
6. Summary of Public Consultation	Archie Aparicio	15/03/2024

13. Fees for External Proponents

Proponents external to NPWS are required to pay an initial fee of \$220 (a final fee is also required before determination of the REF).

- \$220 payment/cheque for initial fee is enclosed
- A waiver of fees is requested for the following reasons:

14. 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)	Archie Aparicio c/- Genus Services Pty Ltd on behalf of Amplitel Pty Ltd and Telstra Ltd
Position	Town Planner
Date	20/03/2024



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)	
Position	
Date	

Seal (if signing under seal):