North Manyana Subdivision

Public Submissions and Responses Report

Heir Asquith Pty Ltd

September 2026

→ **The Power of Commitment**



Contents

1. Introduction **1**
- 1.1 Project overview 1
- 1.2 EPBC assessment context 1
- 1.3 Purpose of the report 1
- 1.4 Scope and limitations 1

2. Public exhibition and consultation process **3**
- 2.1 Exhibition process 3
- 2.2 Communications and engagement activities 3
  - 2.2.1 EPBC referral portal 3
  - 2.2.2 Public notices 3
  - 2.2.3 Website information 5
  - 2.2.4 First Nations engagement 5

3. Engagement outcomes **6**
- 3.1 Overall submissions 6
- 3.2 Submissions analysis 7
  - 3.2.1 Submission categories 7
  - 3.2.2 Submission themes 8

4. Summary of responses to the issues raised in public exhibition **12**
- 4.1 Planning and process 12
- 4.2 Short-term construction-phase impacts 14
- 4.3 Long-term impacts 14
- 4.4 Adequacy of Preliminary Documentation 16

Table index

Table 1	Submissions summary	6
Table 2	Submissions sentiment	7
Table 3	Submission categories	7
Table 4	Submissions by category	8
Table 5	Submission themes	8
Table 6	Submissions analysis	9
Table 7	Responses to each Planning and process theme	12
Table 8	Responses to each Short-term construction-phase impacts theme	14
Table 9	Responses to each Long-term impacts theme	14

Figure index

Figure 1	Illawarra Mercury public notice	4
Figure 2	The Daily Telegraph public notice	4
Figure 3	Source of submissions	6
Figure 4	Submissions by category	8
Figure 5	Percentage of submissions classified by theme	11

1. Introduction

1.1 Project overview

The North Manyana Subdivision Proposal (EPBC Act Referral 2021/8948; Development Application SF10921) is a proposed residential subdivision located at North Manyana on the New South Wales South Coast ('the proposal'). The proposal was originally submitted to Shoalhaven City Council in December 2021 and has been refined over several years in response to environmental investigations, technical assessments and the planning approval process. It was subsequently the subject of Land and Environment Court proceedings, through which a Section 34 agreement was reached, resulting in the issue of development consent under the New South Wales planning framework.

The proposal is also subject to assessment under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to its potential impacts on Matters of National Environmental Significance (MNES). As part of the Commonwealth assessment process, Preliminary Documentation was prepared and made available for public review and comment.

Public exhibition of the Preliminary Documentation provided an opportunity for community members, Traditional Custodians, interested stakeholders, organisations and government agencies to review information relating to the proposal and provide feedback for consideration as part of the Commonwealth decision-making process.

1.2 EPBC assessment context

The proposal is being assessed under the EPBC Act, Australia's principal environmental legislation.

On 19 June 2026, the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) issued a Direction to Publish, confirming that the draft Preliminary Documentation was suitable for publication and public exhibition. The Direction to Publish required the proponent to publicly exhibit the Preliminary Documentation and invite public comment as part of the Commonwealth assessment process.

Responsibility for administering the EPBC Act has since transferred to the National Environmental Protection Agency (National EPA), established on 1 July 2026.

Public exhibition of Preliminary Documentation is intended to provide transparency in the assessment process and ensure community and stakeholder perspectives are considered alongside technical and environmental assessment information. Feedback received throughout the exhibition period forms an important input into the Department's assessment of the proposal.

1.3 Purpose of the report

The purpose of this Public Submissions and Responses Report is to provide a consolidated record of the public comment response process for the North Manyana Subdivision Preliminary Documentation. It outlines the engagement process undertaken and summarises comments received during public exhibition, categorises issues raised, identifies recurring themes, and provides responses to these issues, as required by the Commonwealth assessment process.

1.4 Scope and limitations

This report has been prepared by GHD for Heir Asquith Pty Ltd and may only be used and relied on by Heir Asquith Pty Ltd for the purpose agreed between GHD and Heir Asquith Pty Ltd as set out in section 1.3 of this report.

GHD otherwise disclaims responsibility to any person other than Heir Asquith Pty Ltd arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section(s) 1.4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

2. Public exhibition and consultation process

2.1 Exhibition process

The North Manyana Subdivision Preliminary Documentation was placed on public exhibition from Thursday 16 July 2026 to 5:00pm Wednesday 29 July 2026, in accordance with the requirements of the National EPA. The exhibition period provided an opportunity for community members, organisations, government agencies and other interested stakeholders to view the Preliminary Documentation for the proposal and provide feedback for consideration as part of the EPBC Act assessment process.

Documentation made available during the exhibition period included:

– North Manyana Subdivision Preliminary Documentation Report – June 2026
– Appendix A – Preliminary Documentation – Specified Information Requirements
– Appendix B – Biodiversity Development Assessment Report - Part A
– Appendix B – Biodiversity Development Assessment Report - Part B
– Appendix C – Social and Economic Impact Assessment
– Appendix D – Link to referral documentation for North Manyana Subdivision (EPBC 2021/8948)

Documentation was made available electronically via a dedicated project website (**northmanyanaproject.com.au**) and in hard copy format provided through Ulladulla Library, the State Library of NSW and upon request if required.

Submissions could be lodged through an online form on the project website or via email to **epbc.referrals@nationalepa.gov.au**. Enquiries relating to the proposal were managed through dedicated project communication channels established specifically for the public exhibition process.

While submissions were received via the project website and email, no enquiries separate to formal submissions were received during the exhibition period.

2.2 Communications and engagement activities

A range of communication and notification activities were undertaken to inform stakeholders and the broader community of the public exhibition period and opportunities to participate in the assessment process.

2.2.1 EPBC referral portal

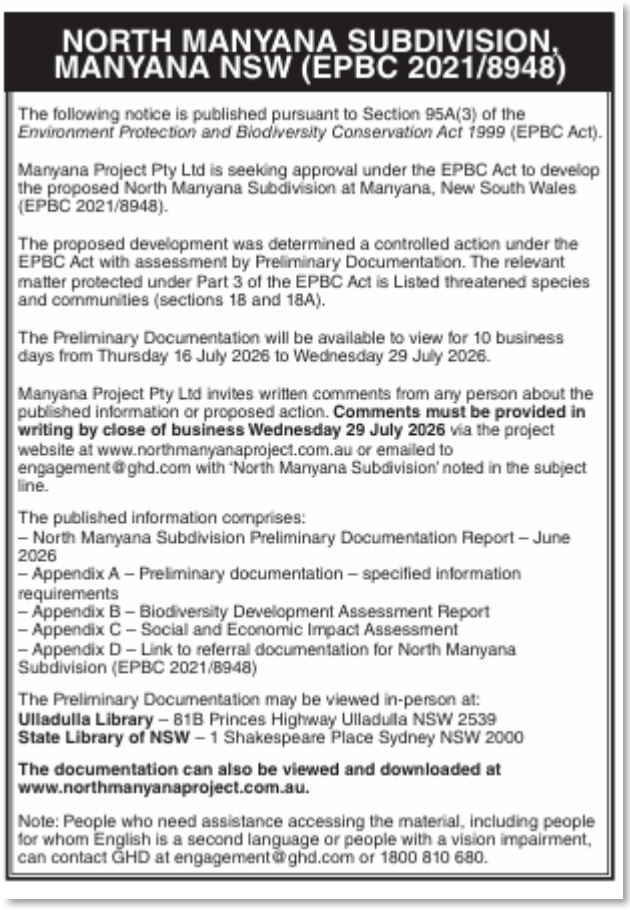
The EPBC Act Public Portal is an Australian Government platform that provides public access to information relating to actions referred under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and supports public participation in the assessment process.

During the exhibition period, a link to the referral documentation for the North Manyana Subdivision Proposal (EPBC Act Referral 2021/8948) was available through the EPBC Act Public Portal (**Project Decision EPBC Act Public Portal**). The referral documentation relates to the proposal as originally referred in 2021. As the proposal has subsequently changed substantially, the referral documentation available through the portal should not be relied upon as a source of current project information. Consideration of the proposal should instead be based on the exhibited Preliminary Documentation and supporting appendices.

2.2.2 Public notices

Public notices were prepared and published in accordance with the Department's Direction to Publish requirements. Notifications were placed in:

– Illawarra Mercury on Thursday 16/07 (print edition) (Figure 1)
– The Daily Telegraph on Thursday 16/07 (print and online edition) (Figure 2).



NORTH MANYANA SUBDIVISION, MANYANA NSW (EPBC 2021/8948)

The following notice is published pursuant to Section 95A(3) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Manyana Project Pty Ltd is seeking approval under the EPBC Act to develop the proposed North Manyana Subdivision at Manyana, New South Wales (EPBC 2021/8948).

The proposed development was determined a controlled action under the EPBC Act with assessment by Preliminary Documentation. The relevant matter protected under Part 3 of the EPBC Act is Listed threatened species and communities (sections 18 and 18A).

The Preliminary Documentation will be available to view for 10 business days from Thursday 16 July 2026 to Wednesday 29 July 2026.

Manyana Project Pty Ltd invites written comments from any person about the published information or proposed action. **Comments must be provided in writing by close of business Wednesday 29 July 2026** via the project website at www.northmanyanaproject.com.au or emailed to engagement@ghd.com with 'North Manyana Subdivision' noted in the subject line.

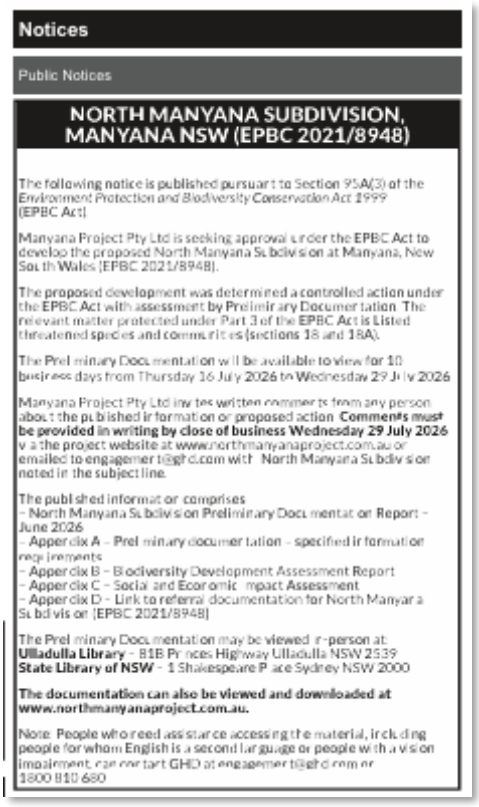
The published information comprises:
– North Manyana Subdivision Preliminary Documentation Report – June 2026
– Appendix A – Preliminary documentation – specified information requirements
– Appendix B – Biodiversity Development Assessment Report
– Appendix C – Social and Economic Impact Assessment
– Appendix D – Link to referral documentation for North Manyana Subdivision (EPBC 2021/8948)

The Preliminary Documentation may be viewed in-person at:
Ulladulla Library – 81B Princes Highway Ulladulla NSW 2539
State Library of NSW – 1 Shakespeare Place Sydney NSW 2000

The documentation can also be viewed and downloaded at www.northmanyanaproject.com.au.

Note: People who need assistance accessing the material, including people for whom English is a second language or people with a vision impairment, can contact GHD at engagement@ghd.com or 1800 810 680.

Figure 1 Illawarra Mercury public notice



Notices

Public Notices

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Figure 2 The Daily Telegraph public notice

2.2.3 Website information

A dedicated project website – **northmanyanaproject.com.au** – was established to host the Preliminary Documentation package and supporting information. The website provided a central source of project information and included details on how to access documentation and make a submission during the exhibition period.

2.2.4 First Nations engagement

Consistent with Commonwealth guidance for engagement with First Nations people and communities, targeted engagement was sought with the Jerrinja Local Aboriginal Land Council (LALC). Notification of the public exhibition and Preliminary Documentation was provided by letter and email on 15 July 2026, with follow-up telephone calls undertaken on 15 July and 17 July, and a further email follow-up sent on 23 July 2026.

Advice on contacting the LALC was also sought via Shoalhaven Council, who provided details for the current contact person while the CEO was on leave.

No response was received from the LALC during the exhibition period.

3. Engagement outcomes

3.1 Overall submissions

A total of 224 submissions were received during the exhibition period; 144 received through the online form and 80 received via email (Figure 3).

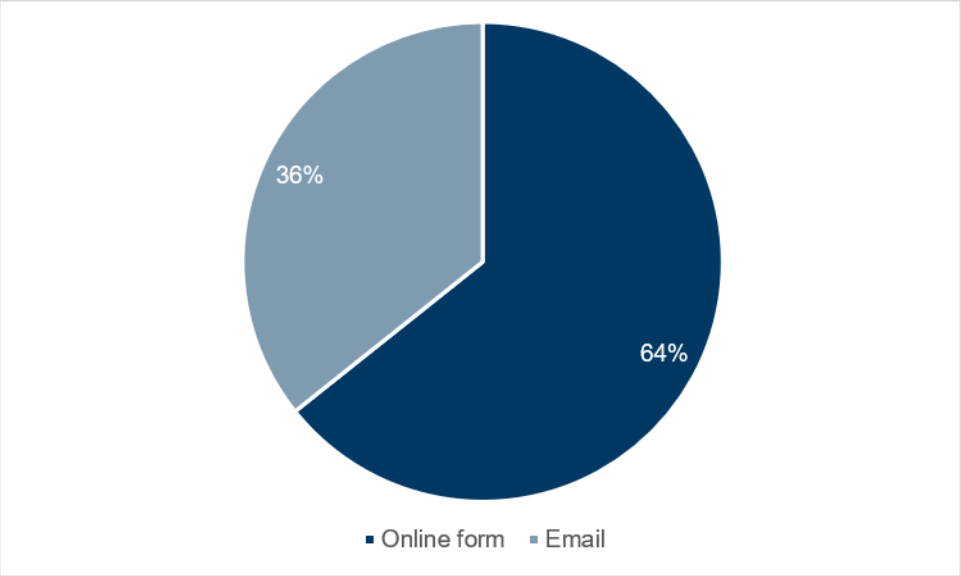


Figure 3 Source of submissions

To avoid double-counting responses, duplicate submissions lodged by the same individual that repeated the same or materially similar content across multiple submission channels were consolidated and treated as a single submission. On this basis, 50 records were identified as duplicates, resulting in 174 unique submissions for thematic analysis.

Demographic information was not systematically collected as part of the submission process. Descriptions provided within submissions indicate participation by a range of stakeholder groups, including local residents and property owners, community and environmental organisations, businesses, visitors, government agencies and other interested parties.

Table 1 summarises the submissions received during the exhibition period.

Table 1 Submissions summary

Submissions received via online form	144
Submissions received via email	80
Total submissions received	224
Duplicate submissions	50
Total unique submissions received	174

3.2 Submissions analysis

Across the 174 submissions, 173 raised objections to the proposal and one was supportive (Table 2).

Table 2 Submissions sentiment

Total unique submissions received	174
Total submissions supporting the proposal	1
Total submissions objecting to the proposal	173

A qualitative thematic analysis approach was used to review the 174 unique submissions. Each submission was read in full and coded against a project-specific framework. A theme was assigned where a submission raised a distinct issue relevant to that theme; a submission could be assigned more than one theme. The analysis was intended to identify recurring issues and support a consolidated response, rather than to determine the technical validity or relative weight of each concern.

The submission register contains 679 specific concerns or issues. These are referred to in analysis as ‘tags’. Where a submission raised multiple issues, more than one theme ‘tag’ could be assigned. On average, 3.9 issues were identified or tagged per submission. Because multiple themes could apply to one submission, category and theme percentages do not sum to 100%. The ‘percentage of submissions’ measure uses 174 unique submissions as the denominator, while ‘percentage of all tags’ uses 679 tags.

The thematic coding process enabled:

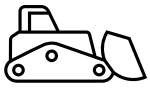
– Identification of the most frequently raised issues
– Comparison of issues raised across stakeholder groups
– Quantification of recurring themes and concerns
– Identification of emerging issues requiring further consideration
– Consistent analysis of both individual and form submissions.

This analysis and coding identified 14 themes under 3 categories, described in sections 3.2.1 and 3.2.2. Some themes overlap, particularly ‘environmental assessment’ and ‘assessment methodology’, and ‘infrastructure and services’ and ‘traffic, population and growth’. The distinctions used in this report are explained in Table 3.

3.2.1 Submission categories

Three broad categories were identified in analysis. These are outlined below.

Table 3 Submission categories

		
Planning and process	**Short-term construction-phase impacts**	**Long-term impacts**
This category relates to the planning framework, assessment processes and decision-making arrangements associated with the proposal. Issues within this category commonly related to the adequacy of assessment processes, strategic justification for the proposal, consultation and decision-making, biodiversity offset arrangements and the long-term governance of conservation land.	This category relates to potential short-term impacts that may arise during the construction phase of the proposal. Issues within this category commonly related to construction traffic, road access, noise, dust and temporary disruption associated with construction activities.	This category relates to the ongoing operation, occupation and long-term consequences of the proposed subdivision. Issues within this category commonly related to biodiversity loss, vegetation clearing, habitat fragmentation, impacts on threatened species and ecological communities, bushfire risk, emergency access and evacuation, and broader changes to the environmental and community character of the area.

The relative numbers of submissions in each category are outlined in Table 4 and illustrated in Figure 4.

Table 4 Submissions by category

Category	Number of tags (total = 679)	Percentage of all tags	Number of submissions that include this category	Percentage of submissions that include this category
Planning and process	261	38%	130	75%
Short-term construction-phase impacts	6	1%	6	3%
Long-term impacts	412	61%	168	97%

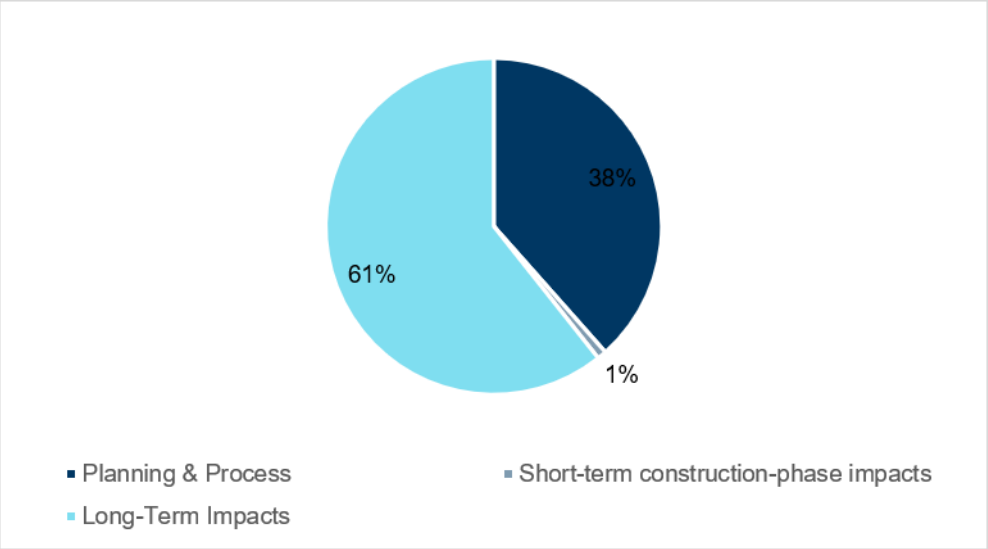


Figure 4 Submissions by category

3.2.2 Submission themes

Submission analysis revealed 14 themes across the 3 previously described categories, as outlined in Table 5.

Table 5 Submission themes

Planning and process	Short-term construction-phase impacts	Long-term impacts
1. Environmental assessment 2. Planning and strategic justification 3. Consultation and transparency 4. Assessment methodology 5. Governance and decision-making 6. Conservation land management 7. Biodiversity offsets 8. Aboriginal cultural heritage and engagement	9. Traffic and access	10. Biodiversity and environmental values 11. Bushfires, floods and emergency management 12. Infrastructure and services 13. Traffic, population and growth 14. Community character and amenity

The number of submissions received against each theme and the issues raised are summarised in Table 6 and illustrated in Figure 5.

Table 6 Submissions analysis

Theme	Number of tags under this theme	Percentage of submissions that include this theme	Primary concerns of theme
Planning and process			
1. Assessment methodology	64	37%	Concerns about the methods, assumptions and evidence used in the assessments for the proposal, including survey limitations, post-fire baselines, cumulative-impact analysis, habitat connectivity, hydrology and runoff, bushfire and evacuation modelling, holiday-peak traffic assumptions, infrastructure failure scenarios and the effectiveness of proposed mitigation and management measures.
2. Environmental assessment	56	32%	Concerns about the assessment conclusions and the completeness of the Preliminary Documentation, including whether acknowledged significant impacts, indirect and cumulative effects, downstream receiving environments and additional threatened species had been adequately considered. Some submissions disagreed with the conclusions that the proposal would result in acceptable environmental impacts rather than identifying a factual error.
3. Planning and strategic justification	49	28%	Concerns related to the demonstrated need for additional housing in Manyana, the potential for new dwellings to be used as holiday homes or short-term accommodation, the suitability of the site for residential development and whether the proposal would contribute to local or regional housing needs.
4. Biodiversity offsets	41	24%	Concerns that offsets would not replace local habitat or ecological function; uncertainty about the availability, location, timing and like-for-like character of credits; whether on-site restoration was being treated as equivalent to offsetting; and whether the proposed approach adequately addressed the Commonwealth EPBC Act Environmental Offsets Policy. One submission specifically requested clearer treatment of the Commonwealth policy and the relationship between the future conservation-lot Biodiversity Stewardship Agreement (BSA) and the required offset strategy.
5. Conservation land management	39	22%	Concerns about whether a community association – particularly one with absentee or short-term owners – would have the expertise, funding and commitment to manage sensitive conservation land and associated infrastructure over the long term. Specific concerns included references to levies, weeds, pets, rubbish, rodenticide use, retained hollow-bearing trees, monitoring, enforcement, maintenance failure and the respective roles of the community association, Vegetation Management Plan (VMP), BSA and Biodiversity Conservation Trust (BCT).
6. Governance and decision-making	6	3%	Concerns about the planning and approval process, the role of decision-makers, perceived bias in assessments and whether environmental and community interests would be appropriately considered in determining the proposal.
7. Aboriginal cultural heritage and engagement	6	3%	Concerns about Aboriginal cultural heritage and engagement, including registered Aboriginal sites, reported need for an Aboriginal Heritage Impact Permit (AHIP), avoidance of harm, protection of cultural landscapes and ongoing involvement of Traditional Custodians and Aboriginal organisations. Some submissions also raised the setting and dignity of the Goodsell grave.

Theme	Number of tags under this theme	Percentage of submissions that include this theme	Primary concerns of theme
8. Consultation and transparency	4	2%	Concerns regarding the adequacy of community consultation, transparency of the assessment process, accessibility of project information and whether community feedback would meaningfully influence decision-making.
Short-term construction-phase impacts			
9. Traffic and access	6	3%	Concerns about heavy-vehicle movements, the condition and capacity of Bendalong Road and local streets, construction duration, road safety, dust and noise, temporary disruptions to beach and local access, and whether traffic management would reflect holiday-period conditions.
Long-term impacts			
10. Biodiversity and environmental values	153	88%	Concerns about acknowledged significant impacts on Coastal Swamp Oak Forest and Grey-headed Flying-fox habitat; disagreement with the conclusion for Illawarra and south coast lowland forest and woodland; loss and fragmentation of habitat and hollow-bearing trees; wildlife movement; indirect and cumulative effects; post-fire refuge and recovery; weeds, pets, lighting and edge effects; hydrological change, runoff and downstream effects on the Intermittently Closed and Open Lake or Lagoon (ICOLL) at Inyadda Beach and shorebird habitat; additional threatened species; and uncertainty about restoration outcomes.
11. Bushfires, floods and emergency management	108	62%	Concerns about two related but distinct matters: bushfire exposure, firefighting resources, water pressure, defensibility, limited evacuation capacity and the single access road; and flood exposure, altered drainage, stormwater or sewer failure and contaminants reaching downstream environments. Several submitters requested independent evacuation modelling or challenged Bushfire Attack Level (BAL), Asset Protection Zone (APZ) and traffic assumptions based on Black Summer experience.
12. Community character and amenity	91	52%	Concerns about loss of Manyana's low-density coastal and bushland character, tranquillity, natural beauty and recreation values; increased noise, light and activity; cumulative development; community division and consultation fatigue; and adverse effects on wellbeing, including post-fire trauma and ecological grief.
13. Infrastructure and services	35	20%	Concerns about the capacity of existing infrastructure and essential services, including water supply, sewerage, roads, utilities and emergency services, to accommodate future population growth.
14. Traffic, population and growth	21	12%	Concerns regarding increased traffic volumes, population growth, cumulative development pressures and the capacity of local infrastructure and services to accommodate additional residents and visitors.

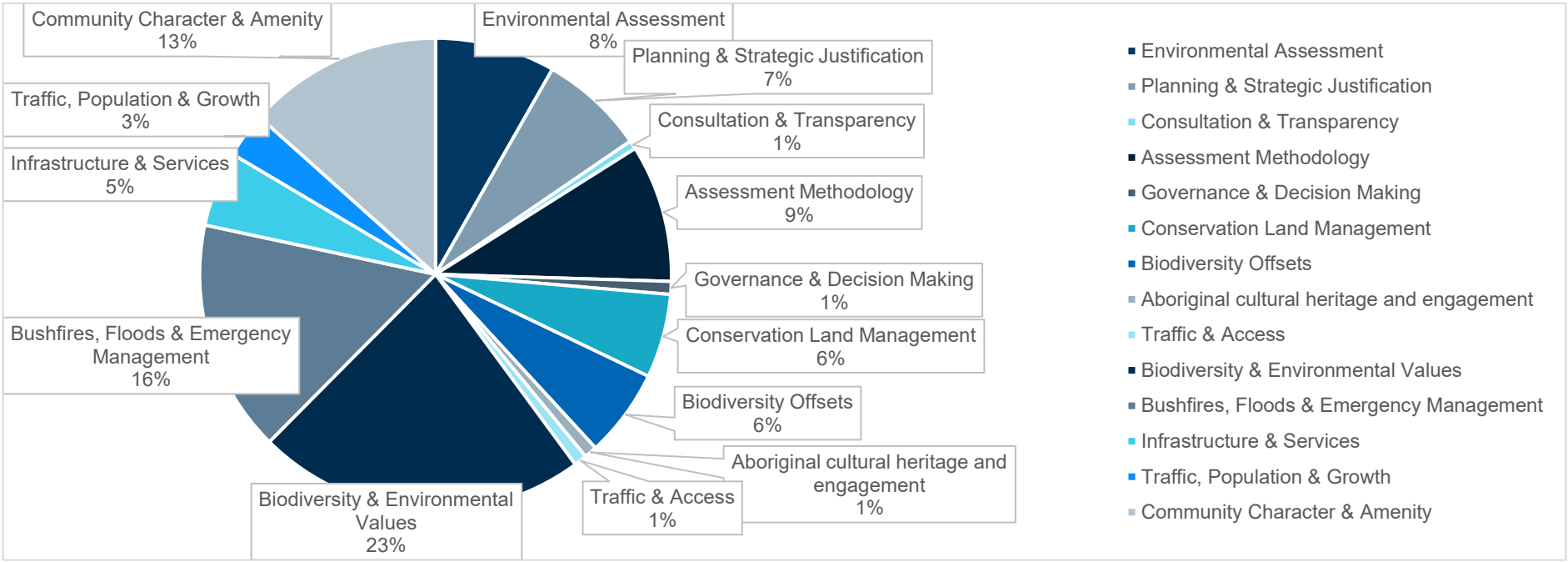


Figure 5 ***Percentage of submissions classified by theme***

4. Summary of responses to the issues raised in public exhibition

A total of 679 separate mentions of specific concerns or issues (‘tags’) were identified across the submissions received during the public exhibition process, analysis of which resulted in 14 themes under 3 categories.

This section provides a consolidated response to the themes identified through the submissions analysis. The responses are grouped under the three categories used in the submissions analysis: planning and process, short-term construction phase impacts and long-term impacts. The responses draw on the technical investigations, assessment findings and management measures that inform the proposal. Outcomes of the review are presented with a focus on confirming whether any updates would be required to the preliminary documentation.

4.1 Planning and process

Table 7 Responses to each Planning and process theme

Theme	Response	Outcomes following review
1. Environmental assessment	The Preliminary Documentation and supporting biodiversity assessment address the three controlling MNES, including avoidance, direct and indirect impacts, cumulative impacts, mitigation, conservation-land management and offsets. Technical assessments were undertaken in accordance with applicable Commonwealth and New South Wales assessment requirements. These concluded that the proposal is not likely to have a significant impact on Illawarra and south coast lowland forest and woodland but would have significant residual impacts on Coastal Swamp Oak Forest and Grey-headed Flying-fox habitat. These assessments informed the design of the proposal and associated mitigation measures and were considered through the development approval process, including Council acceptance of the supporting assessment documentation and subsequent Land and Environment Court review. Submissions raised concerns with the level of impact on features of the natural environment, including with regards matters that are outside the scope of the Preliminary Documentation. Submissions disputing assessment conclusions or identifying potential omissions were reviewed against the relevant assessment material. The review did not identify a factual error or material omission requiring amendment to the Preliminary Documentation.	The review confirmed that the matters raised are addressed in the exhibited assessment material. No update to the Preliminary Documentation is required.
2. Planning and strategic justification	The proposal is located on land that has been identified for a 42-lot residential subdivision, including 41 conventional residential lots and one larger residential lot, within land zoned for residential development. The Social and Economic Impact Assessment identifies both potential benefits and negative social impacts, including community opposition and wellbeing effects. Submissions questioned housing need, affordability and the likelihood of holiday-home use. These matters qualify the claimed housing benefit but are not controlling matters under the current EPBC Act assessment. The future occupancy or use of individual lots, including whether dwellings are used as permanent residences, holiday homes or short-term accommodation, are not determined through the current EPBC Act assessment. Any future development beyond the approved subdivision would be subject to separate approval requirements.	No update to the Preliminary Documentation is required.

Theme	Response	Outcomes following review
3. Consultation and transparency	The Preliminary Documentation was publicly exhibited through the channels described in Section 2, in accordance with Commonwealth requirements. This report records the issues raised in submissions and how they were considered. Public exhibition does not mean that each requested change will be adopted. The issues raised have been recorded and reviewed against the exhibited assessment material. Public exhibition provides an opportunity for submissions to inform the assessment process but does not require that each requested change be adopted.	No update to the Preliminary Documentation is required.
4. Assessment methodology	The biodiversity assessment is based on specialist technical investigations, established assessment frameworks and relevant legislative requirements. The assessment describes surveys undertaken from 2018 to January 2025, post-fire recovery, direct and indirect impacts, cumulative effects, connectivity and significance. The proposal has been assessed having regard to direct, indirect and cumulative impacts, with mitigation and management measures developed to address identified risks. The submissions raised specific methodological questions, including survey detectability, post-fire recovery and baseline conditions, landscape connectivity, cumulative clearing, runoff and hydrology, offset certainty, holiday-peak traffic, evacuation capacity and infrastructure failure; however, no specific gaps or inaccuracies in the Preliminary Documentation were identified.	The review of submissions related to the biodiversity assessment did not identify a factual error, material omission or methodological issue requiring amendment to the Preliminary Documentation. No update to the Preliminary Documentation is required.
5. Governance and decision-making	The proposal has been subject to review through both State and Commonwealth assessment processes. Concerns about the NSW conciliation and approval process are outside the controlling provisions for this Commonwealth assessment. The submissions are recorded, but suggestions about motives or process do not alter the MNES assessment unless they identify relevant evidence or an assessment omission.	No update to the Preliminary Documentation is required.
6. Conservation land management	NSW consent requires the maximum possible extent of the conservation area to be secured under a BSA before a Subdivision Certificate is issued. Concerns regarding the long-term management of conservation land are addressed through this BSA and the approved VMP. While the conservation lot would form part of the approved development, the BSA would establish legally enforceable management obligations, dedicated funding, management actions and compliance oversight. Together with the approved VMP, this framework is intended to support the long-term management of the conservation land and clarify relevant management and accountability requirements.	The review confirmed that the respective management and accountability mechanisms are adequately described. No update to the Preliminary Documentation is required.
7. Biodiversity offsets	Submissions raised concerns with the NSW Biodiversity Offsets Scheme (BOS); however, no specific gaps or inaccuracies in the Preliminary Documentation package information were raised. Residual biodiversity impacts have been assessed through the NSW Biodiversity Assessment Method (BAM) and BOS. The Commonwealth has endorsed the NSW system as a suitable approach for securing offsets for residual significant impacts on threatened species and communities listed under the EPBC Act. The proposal also includes conservation and restoration commitments within the conservation lot, proposed to be secured through a BSA, which are intended to provide long-term biodiversity outcomes for affected ecological communities and habitat values. These on-site management commitments are distinct from any requirement to secure offsets for residual significant impacts. The offset approach applicable to the controlling MNES is described in the Preliminary Documentation and would remain subject to the requirements of the Commonwealth assessment and approval process.	The biodiversity review did not identify information in the submissions requiring amendment to the offset assessment in the Preliminary Documentation. No updates to preliminary documentation are required.

Theme	Response	Outcomes following review
8. Aboriginal cultural heritage and engagement	Submissions raised Aboriginal cultural heritage matters that are broader than the three controlling provisions for this EPBC Act assessment, including registered Aboriginal sites, a reported AHIP requirement, cultural landscapes and ongoing involvement of Traditional Custodians. These matters are principally addressed through the NSW Aboriginal cultural heritage and planning frameworks. Cultural heritage investigations undertaken for the proposal are documented in the relevant assessment material. Any future cultural heritage requirements would be subject to the applicable statutory approvals and conditions.	No update to the Preliminary Documentation is required on the basis of the matters raised. Notification of the Jerrinja Local Aboriginal Land Council during exhibition should not be presented as endorsement, agreement or participation in project decision-making.

4.2 Short-term construction-phase impacts

Table 8 Responses to each Short-term construction-phase impacts theme

Theme	Response	Outcomes following review
9. Traffic and access	Construction traffic, road condition, noise, dust and temporary access disruption were assessed through the NSW approval process and are not controlling matters under the EPBC Act assessment. These matters will be managed through the applicable construction traffic and environmental management requirements. Any construction-related pathway capable of affecting the controlling MNES remains relevant to the Commonwealth assessment.	No update to the Preliminary Documentation is required.

4.3 Long-term impacts

Table 9 Responses to each Long-term impacts theme

Theme	Response	Outcomes following review
10. Biodiversity and environmental values	Biodiversity impacts associated with the proposal have been assessed through the Biodiversity Development Assessment Report (BDAR) and supporting technical studies. These assessments considered threatened species, ecological communities, weed invasion and other edge effects, habitat connectivity, fragmentation, waterways and post-bushfire ecological recovery. The BDAR also documented avoidance measures, mitigation measures, management of conservation land and biodiversity offset arrangements incorporated to minimise and manage impacts. Avoidance and minimisation measures, the assessment of serious and irreversible impacts and other matters relevant to the NSW biodiversity framework were considered through the NSW assessment and approval process. Submissions expressed disagreement with the assessed level and acceptability of impact. The review did not identify a factual error or material omission requiring amendment to the Preliminary Documentation.	The biodiversity review confirmed that the issues raised, including direct, indirect and cumulative impacts, are addressed in the exhibited assessment. No updates to the Preliminary Documentation are required.

Theme	Response	Outcomes following review
11. Bushfires, floods and emergency management	Bushfire exposure, evacuation capacity and emergency-service concerns were principally assessed through the NSW planning and bushfire framework and are not controlling matters under the current EPBC Act assessment. They remain relevant to the Commonwealth assessment only where they create a pathway for impacts on the controlling MNES. Flooding, altered hydrology and contaminant runoff remain relevant where they could affect the controlling MNES. The Preliminary Documentation uses flood, stormwater and hydrological assessments that indicate broadly similar pre- and post-development flood behaviour and minor downstream hydrological effects, together with stormwater treatment measures.	No update to the Preliminary Documentation is required for bushfire or evacuation matters. The review confirmed that potential hydrological and downstream impacts relevant to the controlling MNES are addressed in the exhibited assessment material. No amendment to the Preliminary Documentation is required.
12. Infrastructure and services	Water, sewer, electricity, communications, roads, medical services and emergency-service capacity were principally assessed through the NSW approval process and are not controlling matters for this EPBC Act assessment. They are relevant here only where a servicing failure could create an environmental pathway affecting the controlling MNES.	The review did not identify information in the submissions indicating an additional servicing-failure pathway affecting the controlling MNES that is not addressed in the exhibited assessment material. No update to the Preliminary Documentation required.
13. Traffic, population and growth	Operational traffic, holiday peaks, population growth and evacuation capacity were principally assessed under the NSW planning process and are not controlling matters for the current EPBC Act assessment. Future occupancy, holiday-home use and short-term letting are not controlled by the subdivision approval.	No update to the Preliminary Documentation is required.
14. Community character and amenity	The Social and Economic Impact Assessment (SEIA) identifies potential benefits and adverse effects, including community opposition, social tension, reduced wellbeing, post-fire mental-health effects and limited access to services. Submissions provide further context about village character, tranquillity, cumulative development and consultation fatigue. The submissions provide additional context regarding community perceptions and lived experience but do not identify a factual error or material omission in the SEIA requiring amendment to the Preliminary Documentation.	No update to the Preliminary Documentation is required.

4.4 Adequacy of Preliminary Documentation

The submissions were reviewed against the exhibited Preliminary Documentation, Biodiversity Development Assessment Report, Vegetation Management Plan and relevant supporting technical assessments. The review included consideration of the specific concerns raised about assessment methodology, biodiversity impacts, cumulative impacts, post-fire recovery, conservation-land management, biodiversity offsets, hydrology and downstream receiving environments.

The review did not identify any factual errors, material omissions or new information that would alter the assessment of the proposal's impacts on the controlling Matters of National Environmental Significance. The submissions included disagreement with some assessment conclusions and concerns about the effectiveness of mitigation, management and offset measures; however, these matters are addressed in the exhibited assessment material and do not require amendment to the Preliminary Documentation.

A number of submissions also raised matters principally addressed through the NSW planning and approval process, including bushfire risk, evacuation, traffic, infrastructure, cultural heritage, housing need and community character. These matters have been acknowledged in this report but do not require amendment to the Preliminary Documentation.

On this basis, no amendments to the Preliminary Documentation are proposed as an outcome of the public comment review. The submissions and this response report will be provided to the Commonwealth decision-maker for consideration in determining the proposal.



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