Our ref: ID80-1811635832-85031

27 January 2026

[redacted]
Manager
Green Energy Approvals
Department of Water & Environmental Regulation
Locked Bag 10
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Dear [redacted]

Northern Terminal to Neerabup Terminal 330kV Transmission Line – Assessment No: 0002410 – Additional Information

Thank you for the of submissions and feedback on draft the Environmental Review Document (ERD) and supporting Environment Management Plans and Offset Strategy. Following detailed review and considering the comments provided by the public and relevant decision-making authorities, further updates have been made to the ERD and supporting items.

In addition, Western Power has undertaken a review of the proposed Impact Area for the Proposal following the receipt of detailed design and construction information. The review was aimed at reducing the proposed clearing of significant environmental values identified within the Proposal Development Envelope (PDE) and has produced a significantly reduced Impact Area. Table 1 provides an overview of the revised vegetation clearing areas that Western Power is seeking approval for the Proposal. The ERD has been correspondingly updated with the reduced hectare values for clearing. Western Power is of the opinion that a section 43A amendment is not required as there are no new environmental values impacted as a result of the revised Impact Area and significant residual impacts from the Proposal have been reduced in response to decision-making authorities and public comments. The reduced clearing footprint can be reflected in as a condition of approval within the Proposal's Ministerial Statement.

Western Power is requesting a condition limiting all vegetation clearing within the PDE to a maximum of **100.5 ha.**

Table 1 Revised Impact Areas for the Proposal

Proposal Element	Current ERD Impact Area (ha)	Revised Impact Area (ha)
Proposal Development Envelope	217.24	217.24
Native vegetation clearing	124.63	65.35
Non-native vegetation clearing	60.76	32.73
Flora and Vegetation		

Proposal Element	Current ERD Impact Area (ha)	Revised Impact Area (ha)
Banksia Woodlands of the Swan Coastal Plain TEC	4.44	2.23
Low lying *Banksia attenuata* woodlands or shrublands (floristic community type (FCT) 21C) – Priority 3	0.78	0.59
Swan Coastal Plain *Banksia attenuata* – *Banksia menziesii* woodlands (FCT 23b) – Priority 3	0.57	0.36
Banksia woodlands of the Swan Coastal Plain – Priority 3	3.09	1.08
Bush Forever Sites	16.11	15.0
Terrestrial Fauna		
Carnaby's Cockatoo foraging habitat	188.14	100.5
Baudin's Cockatoo foraging habitat	142.67	75.8
Forest Red-tailed Black Cockatoo foraging habitat	85.2	46.9
Black cockatoo suitable nesting trees	2	0
Inland Waters		
Conservation Category Wetlands	4.62	0.8

Western Power acknowledges there are inconsistences in the disturbance figures provided in Table 1 of this letter and within the ERD for total fauna habitat impacted and total vegetation impacted (100.5 ha vs 98.08 ha). A review of the mapping provided by the AECOM flora and vegetation survey team and the AECOM fauna survey team has identified discrepancies in the classification of cleared areas, habitat areas and vegetation units. This is partially due to the Adenanthos Pine Plantations being considered native vegetation by the flora and vegetation survey team (PpAcCe) and non-native/modified habitat by the fauna survey team.

The Adenanthos Pine Plantation was initially classified by the flora and vegetation team as non-native in the AECOM 2023 biological survey report (Table 13 of ERD). However, due to the extent of native species in the understorey, portions of it were reclassified as native following the reconciliation survey completed in 2025 (AECOM, 2025) (Table 24 of ERD). Due to the differences in classification tools and environmental values considered when mapping vegetation units and fauna habitat, the Adenanthos Pine Plantation was not similarly reclassified as native by the fauna survey team during the 2025 AECOM survey (refer to Table 38 and Table 46 of the ERD). This is due to fauna habitat mapping is typically being based on vegetation

mapping but also focused on defining habitat types based on the physical and functional characteristics available for fauna use. Fauna habitat types are often mapped at a broader scale than vegetation units. For instance, fauna habitat mapping can group multiple vegetation units into a single overarching fauna habitat type based on their similar habitat values.

The revised Impact Area produces the following clearing ratios from each of the survey teams:

- Flora and Vegetation survey team mapping
  - 65.35 ha of native vegetation
  - 32.73 ha of non-native vegetation
- Fauna survey team mapping
  - 39.57 ha of native vegetation
  - 60.85 ha of modified vegetation

A condition for a 100.5 ha vegetation clearing limit ensures that all vegetation clearing for the Proposal will be captured by the Proposals approval. However, impact assessments for each significant factor have been informed by the respective mapping completed for each factor, as well as all corresponding trigger and threshold criterion in supporting Environment Management Plans and any offsets required. This ensures that:

- Assessments are transparent and based on scientifically robust information, and knowledge
- the Proposal's impacts to native vegetation are not underestimated, as would be the case if the clearing ratios mapped by the Fauna survey team were used for the impact assessment for Flora and Vegetation
- The value of modified fauna habitats to conservation significant fauna species identified within the PDE, particularly black cockatoos are similarly not underestimated, as would be the case if the Flora and Vegetation survey team mapping were used for the impact assessment.

Impacts for the Proposal will be set out in the ERD in the following format when discussing the Proposal's impacts to Flora and Vegetation and Inland Waters (wetland/riparian vegetation):

- An Impact Area of 100.5 ha, comprising:
  - 65.35 ha of native-vegetation
  - 32.73 ha of non-native vegetation

Impacts for the Proposal will be set out in the ERD in the following format when discussing the Proposal's impacts to Terrestrial Fauna:

- An Impact Area of 100.5 ha, comprising:
  - 39.57 ha of native-vegetation
  - 60.85 ha of modified habitat

The mapping completed by each survey team still produces a total Impact Area that is below the limit of what is outlined in the PCD, as such, the Proposal does not require an amendment under s43A of the EP Act to be feasible.

Summary tables detailing Western Power's response to submissions have been provided below, as well as a package of the updated supporting documents which includes tracked and clean versions of the revised documents. Additional changes to the ERD have been made to those outlined in the Response to

Submissions Tables, where formatting errors and inconsistencies were identified in the document. These have been captured in the tracked version of the ERD provided in the supporting documents package.

Yours sincerely

[redacted]

[redacted]
Principal Environmental Strategy & Policy Advisor

Attachments:

1. Proponent response to comments from Green Energy Approvals
2. Proponent response to Public Submissions

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Attachment 1: Proponent response to comments from Green Energy Approvals

Northern Terminal to Neerabup Terminal 330kV Transmission Line – Assessment No: 0002410 – Additional Information

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Proposal			
1	The Proposal Content Document (PCD) approved on 7 August 2025 indicates disturbance of up to 60.76 ha of non-native habitat. However, the ERD discusses clearing of non-native habitat to the extent of 106.63 ha (Table 3, Table 8, section 7.6.1, table 40, table 44, and Section 10). Green Energy advise that the numbers should be validated and clarified. Where ERD values exceed the defined extents in the PCD, consider if the proposal requires an amendment to be feasible.	Western Power acknowledges there are inconsistences in the disturbance figures provided in Table 1 of this letter and within the ERD for total fauna habitat impacted and total vegetation impacted (100.5 ha vs 98.08 ha). A review of the mapping provided by the AECOM flora and vegetation survey team and the AECOM fauna survey team has identified discrepancies in the classification of cleared areas, habitat areas and vegetation units. This is partially due to the Adenanthos Pine Plantations being considered native vegetation by the flora and vegetation survey team (PpAcCe) and non-native/modified habitat by the fauna survey team. The Adenanthos Pine Plantation was initially classified by the flora and vegetation team as non-native in the AECOM 2023 biological survey report (Table 13 of ERD). However, due to the extent of native species in the understorey, portions of it were reclassified as native following the reconciliation survey completed in 2025 (AECOM, 2025) (Table 24 of ERD). Due to the differences in classification tools and environmental values considered when mapping vegetation units and fauna habitat, the Adenanthos Pine Plantation was not similarly reclassified as native by the fauna survey team during the 2025 AECOM survey (refer to Table 38 and Table 46 of the ERD). This is due to fauna habitat mapping is typically being based on vegetation mapping but also focused on defining habitat types based on the physical and functional characteristics available for fauna use. Fauna habitat types are often mapped at a broader scale than vegetation units. For instance, fauna habitat mapping can group multiple	ERD -Section 6.3.3 Table 13, Section 6.6.1 Table 24, Section 7.3.3 Table 38 and Section 7.6.1 Table 46

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		vegetation units into a single overarching fauna habitat type based on their similar habitat values.
		
		The revised Impact Area produces the following clearing ratios from each of the survey teams:
		
		• Flora and Vegetation survey team mapping
		  – 65.35 ha of native vegetation
		  – 32.73 ha of non-native vegetation
		• Fauna survey team mapping
		  – 39.57 ha of native vegetation
		  – 60.85 ha of modified vegetation
		
		A condition for a 100.5 ha clearing limit ensures that all clearing for the Proposal will be captured by the approval. However, impact assessments for each significant factor have been informed by the respective mapping completed for each factor, as well as all corresponding trigger and threshold criterion in supporting Environment Management Plans and any offsets required. This ensures that:
		
		• the Proposal's impacts to native vegetation are not underestimated, as would be the case if the clearing ratios mapped by the Fauna survey team were used for the impact assessment for Flora and Vegetation
		• The value of modified fauna habitats to conservation significant fauna species identified within the PDE, particularly black cockatoos are similarly not underestimated, as would be the case if the Flora and Vegetation survey team mapping were used for the impact assessment.	

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		Impacts for the Proposal will be set out in the ERD in the following format when discussing the Proposal's impacts to Flora and Vegetation and Inland Waters (wetland/riparian vegetation): • An Impact Area of 100.5 ha, comprising: – 65.35 ha of native-vegetation – 32.73 ha of non-native vegetation Impacts for the Proposal will be set out in the ERD in the following format when discussing the Proposal's impacts to Terrestrial Fauna: • An Impact Area of 100.5 ha, comprising: – 39.57 ha of native-vegetation – 60.85 ha of modified habitat The mapping completed by each survey team still produces a total Impact Area that is below the limit of what is outlined in the PCD, as such, the Proposal does not require an amendment under s43A of the EP Act to be feasible. Given the non-native vegetation within the PDE is primarily of value to black cockatoos, and the impact areas and significance of impacts to black cockatoos is derived from habitat quality scoring completed using the Bamford 2020 foraging habitat quality assessment tool, which considers both native and non-native vegetation, the discrepancy in the vegetation mapping between survey teams is not considered to effect the environmental impact assessment for the Proposal. The ERD has been updated throughout to replace 'non-native fauna habitat' with 'modified fauna habitat' in the discussion for impacts to Terrestrial Fauna (Section 7) to provide further clarity on the difference in mapping methodologies for vegetation units and fauna habitats.	

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		During review of the fauna habitat areas, Western Power identified that Urban/Residential habitat was not included in Table 46 of the ERD. The table has been updated to include this habitat, and the impact area values have also been recalculated.	
2	The physical elements of the proposal include underground fibre and optical ground wire but no considerations of impacts have been made in the ERD for these elements. Provide justification for why and detail any impacts that are expected from installation, including any non-compatibilities with proposed mitigations (such as trenching disturbing vegetation over areas of spanned vegetation).	Installation of underground fibre and optical ground wire may require trenching works for open area or horizontal directional drilling. If trenches are required, they will be approximately 300 mm wide, 500 mm deep with 50 m lengths excavated in a staged manner. No additional disturbance is anticipated for this works, as any trenches or drilling activities will be excavated within the Impact Area (within vehicle access tracks where required). For any areas where Western Power has committed to avoiding clearing via spanning over vegetation, all wiring will be similarly strung overhead with no undergrounding or trenching required. The ERD has been updated to be more explicit of its consideration of potential impacts to fauna from trenching works. Western Power notes that there are existing management actions within the TFEMP for minimising impacts to fauna from trenching and open excavations (refer to Table 3 Management action 2.2 and 2.3). These actions are in accordance with Western Power's Excavation and Trenching Procedure (EDM43740956).	ERD – Section 7.4.1 Table 43, Section 7.4.2 Table 44 and Section 7.6.2 p 73 TFEMP – Table 3 p 15-16
Flora and Vegetation			
1	Floristic Community Type (FCT) 21c of the Banksia Woodlands which will be impacted by the proposal is not present at the proposed Offset site at Orange Springs. Therefore, the proposed offset strategy is unlikely adequate to address significant residual impacts of the proposal on FCT 21c. The offset strategy should be updated to capture additional offsets relating to the impacts on the 0.78 ha of FCT 21c in accordance with State and Commonwealth offsets policies.	Following the receipt of detailed design information, Western Power has revised the Impact Area for the Proposal to reduce the impacts to FCT21c from 0.78 ha to 0.59 ha. Western Power acknowledges that this is still a significant residual impact. The biological survey completed for the Orange Springs offset site noted that FCT21c was one of the nine FCTs identified as statistically similar to the vegetation types within Orange Springs. In addition, the soil types, landform positions and records of regional occurrences indicate that it is	Offset Strategy – Section 4.1.2 p 25 Section 4.1.3, Table 13 p 26-27

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		possible for FCT21c to occur within the region (Section 4.1.9 of Appendix F of the Offset Strategy). Western Power will rehabilitate 2.0 ha of the Orange Springs site, targeting Banksia Woodland with a species composition representative of FCT21c. The area for rehabilitation derived using the State and Commonwealth offset calculators is 1.09 ha, however Western Power will commit to rehabilitation of 2.0 ha to increase confidence in the success of reaching the required completion criteria. Note that the 2.0 ha rehabilitated for FCT21c will be synonymous with area allocated for offsets for black cockatoo foraging habitat. The Offset Strategy for the Proposal has been revised to include the offsets for FCT21c at Orange Springs, refer to Sections 4.1.2 and 4.1.3.	
2	The Flora and Vegetation Environmental Management Plan (FVEMP) requires updating to include and address: a. Review the proposed management contained in the Offset Strategy and ERD and ensure the FVEMP is consistent and inclusive of all mitigation measures. b. Table 6. requires additional details to confidently demonstrate how proposed outcomes will be achieved. c. Table 6. Criterion 7 states: 'control within 10% of baseline level' 'of weed abundance' for Threatened Ecological Communities (TEC), Priority Ecological Communities (PEC) and Bush Forever (BF). Targets for Weeds of National Significance and Declared Weeds are recommended to be eradicated from these sensitive areas. Rational should be provided for any feasibility constraints and details added for weed abundances and provisions for likely weed species that will be targeted. d. Detail the timing and distribution of sites for capturing the baseline weed survey(s). Discuss if this includes information from the initial survey quadrates and the installation of additional monitoring sites.	a. Updated. b. Updated. Table 6 (now Table 8 in revised FVEMP) has been updated to include additional specificity around reporting timeframes for trigger and threshold identifications and the implementation of management and contingency actions. c. The flora and vegetation surveys completed by AECOM in 2022 and 2023 (refer to Appendix B and D of the ERD for full reports) included identification of weed species and their abundance within the PDE. No Declared Pests (DPs) or Weeds of National Significance (WONS) were identified during these surveys. Details for likely weed species to be subject to control programs has been added to the FVEMP in Section 2.4.3 p 11 with a full list of species provided as an additional appendix – Appendix D. Threshold 7 (Threshold 8 in revised FVEMP) contingency action has been updated to include a requirement for the weed control program developed to be targeted toward the specific DP or WONS identified, if identified during monitoring programs (Table 8 p 28-29). Western Power cannot target eradication of DPs or WONS as Western Power has no statutory authority to control third party	a. FVEMP, Table 7 and Table 8; ERD – Section 6.5 Table 23 b. FVEMP, Table 8 c. FVEMP, Section 2.4.3 p 11 and Table 8 p 28-29 d. FVEMP, Appendix D e. FVEMP Table 8 p 28-29 f. FVEMP, 8 p 28-29 g. FVEMP, Table 8 p 19-27 h. FVEMP, Table 8 p 28-29

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	e. Include the type of weed control and frequency of proposed treatments, appropriate for each target weed species, including the measures/evidence of success. f. The term 'affected areas' referred to on page 23 needs to be defined. Include what criteria will determine that an area will be managed for weeds. Discuss what change will occur and the required measure to achieve outcomes. g. Include a commitment to the timing and provision of the Revegetation Plan referred to on page 17. h. Include a commitment to the timing for delivery of the 'ongoing monitoring program as advised by a suitably qualified botanist' on pages 23-24. i. Detail the testing for dieback, e.g. The method to be used and whether it will occur in situ and prior to movement. j. Identify any known dieback infested areas that will be targeted for management and what measures will be used. Include the type, frequency and monitoring for effectiveness as relevant. k. Page 10. Indicates a dieback survey has been completed and affected areas will be subject to a dieback management plan. Page 11. States that no dieback survey has been undertaken. The plan should be updated to include the correct information only. l. Details should be incorporated on how impacts to wetland vegetation will be managed to prevent significant residual impacts. m. It is advised to ensure a coordinated approach when considering resourcing of management across tenures such that impacts are mitigated and outcomes are achieved consistent with the EPA factor objective.	access to areas on private property within the PDE. If the post construction weed survey identifies that WONS or DPs have been introduced as a result of the construction of the Proposal, Western Power will implement and maintain a monitoring and control program to manage the infestation within the transmission line corridor, as best as practicable, noting the inability to control third party access. A Disturbance Approval System Permit is being sought for the Proposal which regulates the biosecurity measures required for all DBCA owned land that the PDE intersects and is also a requirement for any maintenance works that Western Power undertakes in future within corridors on DBCA managed land. d. Surveys completed by AECOM in 2022 and 2023 of the PDE included an assessment of weed abundance and diversity (refer to Appendix B and D of the ERD). Appendix D has been added to the FVEMP which includes the full list of weed species and abundance recorded within the PDE during the surveys e. Updated. Detail has been added to confirm that weed control will be via chemical treatment and/or physical removal. The frequency of proposed treatments will start at annually but may increase based on risk informed by results of annual monitoring programs. Measures/evidence of success have been added to the 'Timing/Frequency of Monitoring' column (p 28-29) f. The term 'affected areas' has been removed due to its ambiguity. Weed control will be implemented over the mapped extent of the TEC/PEC patch or Bush Forever site within the PDE where weeds have been identified. g. Threshold contingency actions 1-7 have been updated to include a one month timeframe for the provision of a Revegetation Management Plan.	i. FVEMP, Section 2.4.3 p 12 and ERD, Appendix J j. ERD - Section 6.3.3 p 28-29; FVEMP Table 8 p 29-30 k. FVEMP, Section 2.4.4 p 12 l. IWEMP, Section 3.6 Table 5 and 6 m. NA

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		h. Updated. The FVEMP now specifies that a monitoring program must be implemented within 6 months of trigger/threshold identification, with monitoring frequency to be annually. i. Western Power will not be testing for dieback during construction of the Proposal. Western Power has engaged Terratree who has completed a Dieback Survey of the PDE, including mapping of infested areas and a supporting Hygiene Management Plan (HMP) (ERD, Appendix N). Any movement of infested dieback material will be done in accordance with the Proposal HMP. Additional wording has been added to the FVEMP to summarise the results of the Dieback Survey in Section 2.4.3 Table 6 p 12. j. The Dieback Survey report of the PDE identifies any known dieback infested areas. The report has been provided as Appendix J to the ERD and a section added to the ERD which discusses the survey results (Section 6.3.3 p 28-29). The report included a supporting HMP which outlines management measures for the dieback infested areas identified within the PDE. A copy of the HMP has been provided with the updated EMP package as part of this response to submissions. An additional threshold criterion has been added to the FVEMP (Threshold Criterion 8) which outlines response actions if dieback is detected outside of the mapped infested areas within the PDE. k. Corrected. A Dieback Survey and supporting HMP have been completed for the Proposal, reference to the requirement for a Dieback Survey under 'Key Uncertainties' discussed on page 12 has been removed. l. Impacts to wetland vegetation are dealt with in the Proposal IWEMP. Refer to Table 5 and Table 6. m. Noted. Western Power will aim to achieve a coordinated approach across tenures, as best as practicable, noting the limits	

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		of its statutory authority on sections of the PDE that intersect private land.	
3	It is recognised that a patch of revegetation required by previous development at Neerabup Terminal have been successful at achieving conservation criteria for Tuart Woodlands TEC (EPBC). Advice on the mitigation measures, including but not limited to revegetation and rehabilitation of Tuart Woodlands, is required to demonstrate how cumulative and regional impacts on this community will be addressed. It is recommended that any commitments and measurable outcomes are added to the FVEMP where appropriate.	Western Power has completed a review of the Proposal Impact Area following receipt of detailed design information. As a result, Western Power has managed to avoid clearing of 0.15 ha of the Tuart Woodland TEC, reducing the total clearing of the TEC from 0.59 ha to 0.44 ha. The FVEMP details mitigation measures aimed at minimising Proposal impacts to TECs, such as controls for minimising spread of weeds and disease, risk of fire, and requirement for a botanist to be present during the clearing of TECs. A post-construction review of the final clearing footprint will also be undertaken within one month of construction being completed to identify areas that can be rehabilitated (refer to Trigger/Threshold 10 Table 8 of the FVEMP). Western Power will target rehabilitation of areas of environmental significance as best as practicable. These measures are considered sufficient to mitigate the Proposal's potential cumulative and regional impacts on the TEC.	ERD – Section 6.5 Table 23 and Section 6.6.1 Table 26 p 36 FVEMP – Table 7 and Table 8
4	Bush Forever (BF) Site 304 is intersected by the proposed Development Envelope (DE) however it is not discussed in the ERD. Site 198 is discussed however impacts and descriptions appear synonymous with expectations for site 304. Ensure discussions of impacts are clarified and provided for all BF sites that may be impacted by the proposal.	Acknowledged. Upon review, this has been identified as an error in the ERD, with Bush Forever (BF) Site 304 mistakenly excluded from the environmental impact assessment. The PDE intersects 19.56 ha of BF Site 304 and will impact up to 8.4 ha through clearing activities. The ERD has been updated to include reference to Site 304 and evaluation of Proposal impacts to the site. The revised Offset Strategy has correspondingly been updated to include Site 304 and any related offset requirements.	ERD - Section 6.3.3 Table 17-19 and Section 6.6.1 Table 28-30 Offset Strategy- Section 3.2 p 8
5	It is noted that Western Power proposes to span lower height vegetation as a minimisation method. Noting the small size of BF site 104, further information is required to confirm whether this mitigation measure at site 104 is viable.	The span over method employed by Western Power is only suitable for vegetation patches that are not capable of growing to a height that will encroach the Network Assets electrical clearance zone. This is required to ensure network safety, minimise fire risk and reduce the risk of future encroachment of vegetation.	Offset Strategy- Section 3.2 Table 5 p 9-10 ERD - Section 6.3.3 Table 17-19 and Section 6.6.1 Table 28-30

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		The vegetation within BF site 104 was mapped as Pinus pinaster tall isolated trees over Adenanthos cygnorum var. cygnorum, Xanthorrhoea preissii and Macrozamia fraseri tall to mid sparse shrubland over *Carpobrotus edulis, *Pelargonium capitatum and *Ornithopus pinnatus low sparse foreland). Pinus pinaster commonly reach in excess of 20-30 meters at maturity, therefore BF site 104 is not able to be spanned over due to presence of vegetation within the patch known to grow too tall and pose an electrical safety hazard. Western Power has sought to minimise impacts to Bush Forever sites and has reduced the total Proposal Impact Area following receipt of detailed design information. Clearing at BF Site 104 has been reduced from 0.84 ha to 0.3 ha following Western Power's review of the Proposal's Impact Area, informed by detailed design information. Western Power will also offset impacts to BF sites, in accordance with SPP2.8 (refer to revised Offset Strategy, Section 3.2).	
6	Justification is required for the proposed 20-year commitment to funding for management via the Department of Biodiversity, Conservation and Attractions (DBCA). The justification must discuss the proposed infill planting and monitoring to ensure survival and further planting if required, as well as weed and dieback control. Known difficulties in attaining long term diversity in revegetation or restoration areas should be considered to achieve stated outcomes. If the stated outcomes are not achieved within 20 years, funding beyond this timeframe may be required. Consultation outcomes with DBCA should also be discussed.	Threat abatement and risk management will be imbedded within the Revegetation Management Plans developed for the Offset sites for Western Power to implement for first 10 years of rehabilitation. Western Power has specified a time until ecological benefit of 10 years for the offsets calculated. If completion criteria are met, then there is no ongoing requirement for funding and management. The risk of failing to meet completion criteria within the 10-year timeframe is acknowledged in the Offset Strategy in Table 20. The offsets for the Proposal have been budgeted for, for a 10-year period, with an internal process available to seek additional funds where completion criteria cannot be met, or funds are depleted. Initial negotiations with DBCA have indicated a preference for only the vegetated section to be transferred into the conservation estate. If this remains DBCA's position, then the balance of the Orange Springs site will be protected with a conservation covenant. Funding for DCBA to take on management is yet to be finalised but is expected to be for a 20-year	Offset Strategy – Section 7.3 Table 20 p 48

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		period even noting Western Power will be responsible and implementing the first 10 years of the rehabilitation and threat abatement activities.	
7	ERD section 6.6 seems to have inconsistent quantification of residual impacts. Wetlands and BF quantification both state 25.32 ha however this is inconsistent with values in table 16, stating impacts on BF is 16.11 ha. Review and clarify the extents throughout the ERD for all significant values and advise of the correct values.	Section 6.6 incorrectly stated the areas of BF and wetlands that intersect the PDE, and not the Impact Areas within the PDE. The ERD has been updated to reflect the revised clearing areas that have been determined from a review of the clearing Impact Area using detailed design information. Note that BF Site 304 was mistakenly excluded from the original EIA (refer to line item 4 above for more detail).	ERD – Section 6.3.3 Table 20 and Section 6.6.1 Table 27
8	It appears there may be opportunity to rehabilitate or enhance Banksia Woodlands at the proposed Orange Springs offset site within areas of historical clearing. Restoration offsets are recommended to be considered as a priority, including within the offset strategy, in accordance with the EPA's advice for considering offsets at a regional scale (Public Advice Considering Environmental Offsets at a Regional Scale.pdf).	Agreed. Western Power has submitted a revised Offset Strategy in support of the response to submissions that includes on-ground rehabilitation offsets for the Proposal. Rehabilitation within the cleared area at Orange Springs is now included in the offset strategy for the Proposal's significant residual impacts to Carnaby's Cockatoo foraging habitat and Low lying *Banksia attenuata* woodlands or shrublands FCT21c PEC.	Offset Strategy – Section 3 p 7 and Section 4.1.3 p 26
Terrestrial Fauna			
1	Forest Red Tailed and Baudin's black cockatoo habitat is not present at the proposed offset site at Orange Springs and therefore the proposed offset strategy is unlikely adequate to address the significant residual impacts on these black cockatoo species. The offset strategy should be updated to capture additional offsets relating to the disturbance of black cockatoo habitats in accordance with State and Commonwealth offsets policies.	Noted. Western Power has prepared a revised Offset Strategy which now includes an additional offset site it has since acquired. The additional offset site provides a sufficient rehabilitation area to offset 100 % of the impacts to Baudin's and Forest Red-tailed black cockatoos.	Offset Strategy – Section 4.2 p 30
2	ERD figures 10.1 to 10.13 depict tracklogs as inference of survey effort however, the ERD does not state whether this included searches for invertebrates and Short Range Endemic (SRE) habitat. It is advised that traverses or meanders undertaken for vertebrate fauna and flora and vegetation are not appropriate survey	Noted. The depicted tracklogs are not intended as evidence for searches for invertebrates and SREs. The fauna surveys completed by AECOM for the Proposal did not include searches for SRE species.	ERD – Section 7.3.2 p 52, Section 7.3.3 p 52 and Section 7.6.2 p 67

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	Methods for SREs. EPA guidance recommends a combination of survey methods within suitable habitat (appropriate for the species expected, such as hand foraging, litter sorting, pit traps and spotlighting). Studies and surveys completed for invertebrate fauna should be undertaken by practitioners experienced and competent in invertebrate zoology. It should be discussed how these considerations were addressed.	Whilst undertaking surveys, both targeted and baseline for SRE and conservation significant invertebrates, would provide some additional clarity regarding specific locations for occurrence and avoidance, the most likely habitats for occurrence would be the Banksia woodland habitats (this conclusion was determined by an SME based on assessment of existing biological survey data and desktop assessment). Undertaking field survey increases the confidence in likelihood of occurrence rating for species, both presence and absence, however, due to many of the species' inherent scarcity in nature they are infrequently recorded even in their primary habitat, so an absence of occurrence during a targeted survey does not guarantee an absence of presence within a potential area of suitable habitat. As a result, further surveys are not likely to be beneficial to SRE species in the context of substantially changing the outcomes for the species from the implementation of the Proposal. Impacts to the species have been avoided and minimised by limiting the clearing of areas which have the highest likelihood of occurrence as a habitat for SREs and conservation significant invertebrates, being Banksia Woodland. Clearing for the Proposal will result in the removal of only 3.01 ha of the total 71.48 ha of habitat mapped within the surveyed area (Table 38 of the ERD). In consideration of the limited impacts from linear infrastructure projects to SREs, these measures implemented by Western Power will preserve the habitats of SREs and conservation significant invertebrates and minimise impacts such that there is no significant residual impact. Additional subsections have been added to the ERD to include the information discussed above. Please refer to Section 7.3.3 p 52 and Section 7.6.2 p 67.	
3	Confirm whether the desktop assessment involved a review of the WA Museum records. If it did not, ensure this is addressed in the revised version. Noting that no targeted surveys were conducted for significant SRE species, additional justification is required.	Conservation significant and SRE invertebrates have been considered as part of the environmental surveys for the PDE through a combination of detailed vegetation and targeted flora and basic fauna assessments (AECOM 2023, 2024a, 2024b, 2025). Some areas of Banksia woodland	ERD – Section 7.3.2 p 52, Section 7.3.3 p 52 and Section 7.6.2 p 67

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	Rationalisation, discussion and mitigations should also be discussed and considered for the likely occurring species.	habitat between the Malaga-Ellenbrook Train and Tonkin Highway have previously been surveyed for SRE and conservation significant invertebrates (Invertebrate Solutions, 2020). The key habitats for SRE and conservation significant invertebrates that occur on the northern SCP (Four native bees, one mygalomorph spider and one day flying moth) are primarily Banksia woodland, and to a lesser extent, *Adenanthos* shrubland, and heathland areas of remnant vegetation that retain habitat values (Table 38 of the ERD). Refer to line item 2 above for further detail.	
4	It is noted that Appendix D recommended targeted surveys for SRE to verify the presence of invertebrate species. It is advised that SRE investigations should include all SREs and not just the listed species. The draft ERD (Table 43) and Appendix F (p. 14) reported that SRE's that were likely to occur were not dependant on the DE as critical habitat. Table 43 further concluded that impact is not likely to be significant however additional evidence, and justification is required to give confidence to these conclusions.	Noted. The assessment for the potential for SREs within the PDE was limited to a desktop assessment. Due to the inherent scarcity in nature of many of the species, it was considered that targeted field surveys were unlikely to have a beneficial outcome to the species, and that avoidance and minimisation of key habitat where species were identified as having a high likelihood of occurrence would achieve the best mitigation outcomes for the species. Please refer to response in line item 2 above.	ERD – Section 7.3.2 p 52, Section 7.3.3 p 52 and Section 7.6.2 p 67
5	The ERD lists pre-clearance surveys and 'fauna spotters' as proposed management methods however, no details are provided outlining processes or options for if fauna is identified (such as halting clearing, buffer implementation, fauna relocation, etc). Based on interpretation of the Terrestrial Fauna Environmental Management plan (TFEMP, Table 3. action 1.4) it infers that only management actions will occur where black cockatoo habitat trees (for breeding) are encountered. This should be further discussed and clarified with commitments made to capture other terrestrial fauna.	Updated. Western Power has updated the TFEMP to provide further clarification around the use of pre-clearance surveys and fauna spotters as controls for minimising impacts to terrestrial fauna. Pre-clearance fauna surveys will specifically target black cockatoos to confirm no individuals are utilising the habitat within the proposed clearing area for breeding. Additional detail has been added around the response requirements if black cockatoos are identified during pre-clearance fauna survey (see line item 6 below for further details). Further detail has also been added for the required response by fauna spotters if fauna identified within the clearing area will not move out of the clearing footprint of their own accord.	TFEMP – Table 3 p 14-15 ERD – Section 7.5 Table 45

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		The ERD has been similarly updated with the original text removed. This format aligns with the level of detail provided in the Mitigation and Avoidance tables for the other Environmental Factors discussed in the ERD	
6	TFEMP Table 3 Management Action 1.4 states "if fauna is identified within a breeding tree during the pre-clearance fauna survey (Management Action 1.3). When clearing confirmed Black Cockatoo breeding trees (hollows present), trees will be lowered to the ground to minimise impact and potential injury or shock to fauna that may be within hollows. The felled trees are to be left for a short period on the ground to allow fauna to move of their own accord and for a qualified terrestrial fauna ecologist to inspect the hollows and manage any fauna still present within the hollow." This method may be unsuitable depending on the fauna species present in the hollow and is not supported for positive occurrences of breeding black cockatoos. This method and its appropriateness should be discussed further with DBCA and revised as required.	Acknowledged. Management action 1.4 (Management action 1.5 in revised TFEMP) has been updated to clarify that it refers to the potential nesting trees (no hollows) proposed to be cleared and that this can only occur if it is confirmed to not be occupied by black cockatoos during the pre-clearance fauna survey by a terrestrial fauna ecologist. Management action 1.3 (Management action 1.4 in revised TFEMP) has been correspondingly updated to specify that any trees identified during the pre-clearance fauna survey as being utilised for breeding by black cockatoos will not be cleared and are to be avoided until it is confirmed by a terrestrial fauna ecologist that the black cockatoos are no longer present.	TFEMP – Table 3 p 15
7	Any fauna management interactions such as relocations or direct impacts should be done in accordance with permits and licences managed by DBCA. The TFEMP should refer to the need to acquire such permission for management actions, referencing the relevant legislation.	Acknowledged. Detail has been added to Management action 1.6 specifying the requirement for permits to be obtained and adhered to where the option of relocating fauna outside of the clearing footprint is implemented.	TFEMP – Table 3 p 15
8	TFEMP Table 3 Management Action 1.5 states that "The fauna spotter has the authority to stop works if a threatened fauna species is identified during clearing works and to attempt to usher the animal outside of the clearing area." However, no other action(s) are proposed if the "attempt" is unsuccessful. A contingency should be in place to ensure fauna are not directly impacted if spotted and are not immediately ushered away.	Acknowledged. Management action 1.5 (Management action 1.6 in revised TFEMP) has been updated to include the requirement for either an avoidance buffer to be established or for fauna to be relocated in accordance with an appropriate DBCA permit in instances where attempts to usher fauna outside of the clearing area are unsuccessful.	TFEMP – Table 3 p 15

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9	The avoidance areas mentioned in Table 39 are not illustrated or discussed in the ERD. The proposal uses an indicative layout approach and areas of high value habitat identified for avoidance commitments should be further illustrated, discussed and committed to demonstrate the avoidance and provide the EPA confidence for their assessment. If these areas match avoidance commitments in the TFEMP it should be referenced or updated for consistency.	Acknowledged. The text in Table 39 (Table 45 in revised ERD) has been updated to clarify that there is no designated avoidance areas established within the PDE. Avoidance has been demonstrated through: – The alignment of the Impact Area within the PDE such that no suitable breeding trees will be cleared – Areas of Banksia Woodland TEC have been spanned over, banksia woodlands represent high-value foraging habitat for black cockatoos – Review of the proposed clearing for the Proposal resulting in a 48% reduction of the Proposal's impacts to black cockatoo foraging habitat (please refer to Table 1 in the Cover Letter supporting this attachment for the reduced Impact Areas within the PDE).	ERD – Section 7.5 Table 45
10	It appears there is opportunity to rehabilitate or enhance Carnaby habitat at the proposed Orange Springs offset site within areas of historical clearing. Restoration offsets are recommended to be considered as a priority, including within the offset strategy, in accordance with the EPA's advice for considering offsets at a regional scale (Public Advice Considering Environmental Offsets at a Regional Scale.pdf).	Agreed. Western Power has submitted a revised Offset Strategy in support of the response to submissions that includes on-ground rehabilitation offsets for the Proposal. Rehabilitation within the cleared area at Orange Springs is now included in the offset strategy for the Proposal's significant residual impacts to Carnaby's Cockatoo foraging habitat and Low lying *Banksia attenuata* woodlands or shrublands FCT21c PEC.	Offset Strategy – Section 3 p 7 and Section 4.1.3 p 27-28
11	Advice is required on whether artificial hollows are proposed to be installed to mitigate the potential impacts to suitable and potential black cockatoo nesting trees. Where artificial hollows are to be considered, it is advised to adhere to DBCA guidance for design, siting and maintenance DBCA Fauna Note - Artificial hollows for all black cockatoos	Following the revision of the Proposal Impact Area, Western Power has managed to avoid impacting all suitable nesting trees identified within the PDE. The Proposal will clear up to 54 potential nesting trees, however, none of these trees contain hollows or suitable hollows. The ERD and Offset Strategy have been updated to remove the requirement to install artificial nesting hollows.	Offset Strategy – Section 2.4 Table 3 p 7
12	The proposed offset site in Orange Springs is 70 km north of the proposed impact areas. The proximity of the proposed offset site to known Carnaby's cockatoo roosting and breeding areas should be provided using Birdlife Australia and DBCA data, as evidence for	It is acknowledged that the offset site is located outside of the range of the local population that is impacted by the Proposal, being 70km north of the Proposal. However, the Proposal's impact site location within the highly developed Perth Metropolitan northern region meant that	Offset Strategy – Section 4.1.2 p 25

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	demonstrating the suitability of the site at a subregional scale for Carnaby's cockatoo.	properties available for purchase, of the required size and that also supported the targeted environmental values for offsets were significantly limited. As such, offsets have focused on bioregion (Swan Coastal Plain), landscape scale improvements for the species with a focus on creating increased connectivity of the fragments of supporting habitat for Black Cockatoos within their range across the Jarrah Forest and into the Swan Coastal Plain. As urban areas continue to develop and expand, there is growing evidence that flocks of Carnaby's Cockatoo can have variability in their home ranges extending from 12-480 km. The Orange Springs site will protect existing critical habitat areas, in accordance with the Carnaby's Cockatoo Recovery Plan (DPAW, 2013), and provides greater value to the species than the impact site due to: – The presence of a water source – It's proximity to known roosting, breeding and foraging sites for the species – It being a known frequented area based on review of DBCA records, and – It's location directly adjacent to existing DBCA conservation estate (Moore River National Park). The revised Offset Strategy has been updated to include the above text.	
13	The survey of the proposed Orange Springs offset site identified the presence of dog and cattle. The Offset Strategy should propose measures to manage ongoing impacts associated with these species such as destocking, fence maintenance, and weed and dieback control.	Agreed. Western Power has prepared a revised Offset Strategy which includes the implementation of threat abatement activities at both offset sites, Orange Springs and Hopeland. These activities include weed, dieback and feral animal control measures. Details of the frequency of implementation of the programs and management targets will be outlined in the Revegetation Management Plans developed for each offset site.	Offset Strategy – Section 3.3.3 p 13 and Section 3.4.3 p 16
Inland Waters			

Item No.	Additional Information Requested / Clarification Requested	Proponent Response	Section Addressed (references correspond to clean versions of all documents)
1	Advise on whether the proposal will result in direct disturbance to water bodies, beds or banks of waterways, particularly Bennet Brook. Discuss management measures, impacts and environmental outcomes in relation to Inland Waters.	The ERD identifies the waterbodies that intersect the PDE – 25.09 ha of mapped wetland areas, including 4.62 ha of Conservation Category wetlands. The impacts to these water bodies and the proposed management and mitigation measures are discussed in Section 8 of the ERD and corresponding IWEMP. It was identified during the desktop assessment that the PDE intersects the upper tributaries/catchment area of Bennett Brook (Section 1.3.4). However, no surface expression of tributaries mapped as waterways for Bennett Brook intersect the PDE. Given this, and that none of the Proposal elements consist of infrastructure that will impede the flow of surface water (isolated towers and overhead transmission lines), it is not considered that there will be any disturbance to beds, banks or waterways. The risk of potential indirect impacts to Bennett Brook are considered minimal and that the controls outlined in the IWEMP are sufficient to ensure that risks of impacts are avoided and/or minimised. These measures are intended to protect the physical and cultural values associated with these waterways Please refer to Management actions 1.5-1.13 Table 5 of the IWEMP.	ERD – Section 8.6.1 Table 62 IWEMP – Table 5
Social Surroundings			
1	The significance of non-conservation listed flora species is recognised as a being of high value to the traditional owners. Noting that these species likely occur within the DE and outside of listed heritage places, provide further detail and discussion on the commitments to avoid and minimise impacts to these species during construction and operation, particularly for the culturally significant *Nuytsia floribunda*.	Noted. Biological surveys for the Proposal identified 90 individuals of *Nuytsia floribunda* within the PDE. The Impact Area for the proposal will result in the clearing of one unavoidable *N. floribunda* tree which occurs within Bush Forever Site 198. The ERD has been updated to include consideration of the culturally significant flora species and the avoidance and minimisation measures to be implemented by Western Power to minimise Proposal impacts to the species. The FVEMP has been updated to include a management action for limiting the clearing of *N. floribunda* within the PDE (refer to Table 7, Management target 1.6).	ERD – Section 9.3.2 p 94, Section 9.4.1 Table 67, Section 9.5 Table 69, Section 9.6 p 97, Section 9.6.1 p 97 and Section 9.7 Table 71 FVEMP – Table 7 p 17

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		In addition, the revised Offset Strategy includes provision for seed collection to target species of cultural importance, in this instance *N. floribunda*. These measures are intended to support the continuation of culturally significant flora and associated values within the landscape. Rehabilitation efforts at the Hopeland offset site will include the establishment of *N. floribunda*.	

Proponent response to Public Submissions

Northern Terminal to Neerabup Terminal 330kV Transmission Line – Assessment No: 0002410 – Additional Information

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Flora and Vegetation				
1	Department of Planning Lands and Heritage	The ERD appears to have omitted intersection with Bush Forever site 304. Figure 6 "Environmentally Sensitive Areas, Reserves and Conservation Estates" does not identify Bush Forever 304 as an Environmentally Sensitive Area (ESA). Discussions and information must be updated to capture Bush Forever Site 304 and proposal's potential impacts on it.	Acknowledged. The ERD and revised Offset Strategy have both been updated to include the Proposal's impacts to Bush Forever Site 304. The Proposal will impact 8.4 ha of the site and commitments are included that Western Power will offset two times the impacted area, in accordance with State Planning Policy 2.8	ERD, Section 6.3.3 Table 17-19 and Section 6.6.1 Table 28-30 Offset Strategy, Section 2.4 Table 3 p 7 and Section 3.2.3 p 10
2	Department of Planning Lands and Heritage	The ERD and the supporting Flora and Vegetation Assessment (AECOM, 2023) do not provide an assessment of vegetation complexes for Bush Forever sites, specifically in terms of their pre-development and post-development extents. State Planning Policy 2.8 (SPP 2.8) aims to protect at least 10% of the original extent of each vegetation complex within the Perth Metropolitan Region. Additional Information should be provided to identify and quantify the vegetation complexes within the Bush Forever Sites (104, 198, 304, 398, 399) proposed for impacts. The existing extent and proposed post-clearing extent of each vegetation complex should be clearly stated with reference to the Bush Forever study area (Perth Metropolitan Region portion of the Swan Coastal Plain).	Acknowledged. An additional sub-section has been added to Section 6.3.3 in the ERD which provides more information for the Bush Forever Sites that intersect the PDE, including the vegetation complexes present within each Bush Forever Site within the PDE and the proportion of the pre-European extent remaining within the Perth Metropolitan Region (refer to Tables 17 and 18). The section on Assessment and Significance of Residual Impacts for Flora and Native Vegetation (Section 6.6) has been updated to include Table 30 which outlines the pre- and post-development extents of the vegetation complexes within the Bush Forever sites following clearing, and an analysis of whether this has resulted in any of the vegetation complexes being reduced in area such that they are less than 10% of their pre-European extent within the Perth Metropolitan Region.	ERD – Section 6.3.3 Table 17 and 18 and Section 6.6.1 Table 30

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			Data in the table demonstrates that the proposed clearing will not reduce the remaining extent of any of the vegetation complexes below 10% within the Perth Metropolitan Region.	
3	Department of Planning Lands and Heritage	The ERD and the Flora and Vegetation Assessment provide a discussion of vegetation condition for the proposal area but do not present this information in a way that is specific to the impacted Bush Forever sites. An evaluation of vegetation condition specific to Bush Forever sites should be provided. Quantify the amount and condition of vegetation for each Bush Forever Site in a pre and post development extent.	Acknowledged. An additional sub-section has been added to Section 6.3.3 in the ERD which provides more information for the Bush Forever Sites that intersect the PDE, including the vegetation complexes present and their condition prior to clearing (refer to Table 19). The section on Assessment and Significance of Residual Impacts for Flora and Native Vegetation (Section 6.6) has been updated to include Table 29 which quantifies the amount and condition of Bush Forever Sites that remain post clearing. The Proposal has prioritised clearing of degraded sections of Bush Forever Sites as far as practicable. Of the 15 ha of Bush Forever Sites that will be impacted by clearing activities for the Proposal, 13.4 ha is in Degraded or Completely Degraded Condition, with the remainder (1.6 ha) in Excellent or Very Good condition.	ERD – Section 6.3.3 Table 19 and Section 6.6.1 Table 29
4	Department of Planning Lands and Heritage	SPP 2.8 Appendix 4 outlines the parameters for providing offsets for Bush Forever areas, namely that there should be no net loss for regionally significant vegetation within Bush Forever. The proponent should have regard for SPP 2.8 to further refine and discuss proposed offsets in Orange Springs.	Acknowledged. Western Power has provided a revised Offset Strategy which includes reference to the SPP2.8 requirement to offset two times the calculated loss in habitat hectares. The Offset Strategy notes that the land to provide this offset has been secured, but conditioning will be determined via the Development Application decision-making processes under the *Planning and Development Act 2005*. This is also noted in the ERD in Section 2.2 Table 3.	Offset Strategy – Section 2.4 Table 3 p 7 and Section 3.2.3 p 10 ERD – Section 2.2, Table 3 p
5	Department of Planning Lands and Heritage	Proposed Offset Site in Orange Springs does not contain the Bassendean complex - central and south; Southern River complex (13.24% remaining within the MRS portion of the Swan Coastal Plain); and Pinjar complex. It is preferable that these are included in proposed offsets sites and mitigations and justification must be provided where this is not possible.	Noted. The Orange Springs site is mapped as Bassendean Complex – North and Bassendean Complex – North Transition. It is noted that the Orange Springs site does not have the Pinjar complex that is being impacted but it is considered the impacts of 0.03 ha of completely degraded Pinjar Complex are not so significant and that to rehabilitate at such a small scale it would not be	Offset Strategy

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			considered a viable vegetation patch. The 0.03 ha of Pinjar complex impacts will instead be incorporated into the area for Bassendean Complex North / North Transition. The Hopeland offset site is mapped as Bassendean Complex – Central and South complex and is within 1km of the mapped edge of the Southern River complex. The Southern River vegetation complex shares some similarities with the Bassendean complex in upland areas and is considered a transitional zone between the Bassendean and Guildford formation. Given this and that both complexes support species such as Jarrah, Sheoak, and various Banksia species it is considered that the rehabilitation of the Hopeland offset site is suitable to address impacts to both complexes.	
6	Department of Climate Change, Energy, the Environment and Water	The land acquisition offset site in Orange Springs has minimal land management actions proposed for Banksia Woodlands TEC.	Acknowledged. Western Power has provided a revised Offset Strategy which includes commitments to on-ground land management actions, including: – Protect and manage important and critical habitat – De-stocking the site of livestock within 12 months of the Proposals referral approval – Undertake biennial monitoring and reporting to DBCA, DWER and DCCEEW of the condition, extent and boundaries of the TEC occurrence over a 10-year period – Demarcation of the offset site with signage – Annual monitoring for the first five years for signs of weed propagation, spread of dieback and changes in vegetation condition, with a further 5 years of monitoring with the ongoing frequency of monitoring risk assessed and revised if required. Where habitat scoring / condition is declining when compared to the SLR (2025) survey or weed spread is encroaching into intact high quality vegetation patches, then annual infill planting and/or weed control will be implemented until the condition is returned to pre-	Offset Strategy – Section 3.3.3 p 13

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			impacted habitat value and weeds are removed and no sign of encroachment into intact vegetation is achieved for two consecutive years. – Bi-annual removal and/or treatment of weeds identified during monitoring events – Within 12 months of the Proposal's referral approval undertake a baseline dieback survey of the site and development of a hygiene management plan if dieback is identified as present and determined to be a threat to the existing biodiversity values – Removal of any rubbish and/or refuse – Maintenance of existing boundary fencing and site access control to prevent public access. Removal of internal fencing to allow unrestricted movement of fauna – For a period of 10 years undertake annual monitoring for signs of feral animals that may be predators or affect the quality of the existing habitat, with feral animal trapping and management triggered where the monitoring identifies feral animals may degrade the existing habitat values. This includes annual monitoring and eradication of feral bees from any suitable hollows present in existing suitable nesting trees.	
7	Department of Climate Change, Energy, the Environment and Water	FCT 21c is absent from the proposed site. As the EPBC Offsets Policy principles necessitate the offset contain the same attributes (like for like), additional offset site(s) may be required for FCT 21c.	Acknowledged. Following the receipt of detailed design information, Western Power has revised the Impact Area for the Proposal to reduce the impacts to FCT21c from 0.78ha to 0.59ha. Western Power acknowledges that this is still a significant residual impact. The biological survey completed for the Orange Springs offset site noted that FCT21c was one of the nine FCTs identified as statistically similar to the vegetation types within Orange Springs. In addition, the soil types, landform positions and records of regional occurrences indicate that it is possible for FCT21c to occur	Offset Strategy – Section 4.1.2 p 25, Section 4.1.3 Table 13 p 26-27

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			within the region (Section 4.1.9 of Appendix F of the Offset Strategy). Western Power will rehabilitate 2.0h a of the Orange Springs site, targeting Banksia Woodland with a species composition representative of FCT21c. The area for rehabilitation derived using the State and Commonwealth offset calculators is 1.09ha, however Western Power will commit to rehabilitation of 2 ha to increase confidence in the success of reaching the required completion criteria. Note that the 2.0ha rehabilitated for FCT21c will be synonymous with area allocated for offsets for black cockatoo foraging habitat. The Offset Strategy for the Proposal has been revised to include the offsets for FCT21c at Orange Springs, refer to Sections 4.1.2 and 4.1.3.	
8	Department of Climate Change, Energy, the Environment and Water	The EPBC Offset Policy requires additionality as a component of the offset package, most commonly seen in the form of rehabilitation or revegetation of the specific MNES species or habitat being offset. This should be incorporated in a revision.	Acknowledged. The Offset Strategy has been updated to include rehabilitation as part of the strategy Western Power will implement to offset the Proposal's significant residual impacts to MNES, in this context, Banksia Woodlands TEC and the three threatened species of Black Cockatoo. The revised Offset Strategy now includes: – Protection and implementation of threat abatement activities to preserve the condition of 122.78 ha Banksia Woodland TEC in Very Good to Excellent condition – Rehabilitation of 2 ha of degraded land at Orange Springs targeting establishment of the Low lying *Banksia attenuata* woodlands of the Swan Coastal Plain PEC (FCT21c) The ERD has also been updated to reflect the revised offset strategy.	Offset Strategy – Section 4.1.2 p 25, Section 4.1.3 Table 13 p 26-27 ERD – Section 6.5 Table 23 and Section 7.5 Table 45
9	Department of Climate Change, Energy, the	If a revised offset strategy contains an averted loss component of the offset, this must be demonstrated via robust evidence that clearly demonstrates a decline in condition for the MNES likely to occur at the proposed offset site(s) without management	The offset calculators used to support the revised Offset Strategy do not account for averted loss, with a quality of 8 specified for the current offset quality, quality without offset and quality with offset. Threat abatement activities will be implemented at the site	Offset Strategy – Section 3.3.3 p 13, Section 3.4.3 p 16

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	Environment and Water	intervention, and further how the Matters of National Environmental Significance (MNES) habitat quality would increase as a result of the management measures.	to reduce the risk of these threats causing a loss in habitat quality in the future. The revised Offset Strategy includes detail of the management measures that will be implemented to ensure that the quality of the vegetation/habitat at the Offset site will be maintained at its current level.	and Section 7.3 Table 20 p 48-49
10	Department of Climate Change, Energy, the Environment and Water	The revised offsets strategy must: a. Include a clear description of management actions and relevant information (including any assumptions) for each MNES. b. Targets for the offset outcome to ensure that the management actions will achieve a final completion criterion within the 20-year management period and should reflect the scoring of the impact site to meet 'like for like' outcomes under the EPBC Offsets Policy. Relevant milestone targets and completion criteria should be identified for each MNES offset outcome. c. An outline of the relevant threats and opportunities in relevant listing and conservation advice. d. Clearly identified timeframes and responsible parties that have consented/agreed to take on the responsibility. e. Provides a risk assessment and contingency measures as outlined below.	Acknowledged. Western Power has submitted a revised Offset Strategy in support of this response to submissions which: a. Describes the management actions for Banksia TEC– Section 3.3.3 p 13 b. Includes targets for offset outcomes and completion criteria – Section 7.3 and Section 7.4 c. Outlines relevant threats and opportunities in relevant listings and conservation advice - Section 3.1, Section 3.3.3 and Section 4.1.2 d. Clearly identifies timeframes and responsible parties – Section 7.1 e. Provides a risk assessment – Section 7.3	Offset Strategy
11	Department of Biodiversity Conservation and Attractions	The proponent should provide further information to verify the presence of *Calectasia elegans* (elegant tinsel lily, ranked critically endangered) in the development envelope. If the presence of *C. elegans* is verified as occurring within the development envelope, provide further information or undertake further investigations (i.e. targeted surveys) to clearly identify and describe the full extent (local and regional) of impacts (direct, indirect and cumulative) from the proposal on the species, including all proposed mitigations.	Western Power notes that at the time of the initial survey of the transmission line corridor in 2022, *Calectasia elegans* was listed as Priority 2 species. AECOM's report NREP1 – NT-NBT 330kV Line Flora, Vegetation and Fauna Assessment (2023) (ERD Appendix B) identified *C. elegans* during its desktop assessment of the buffered survey area and it was allocated a likelihood of occurrence rating of Moderate. Targeted flora searches were only undertaken for species with a likelihood of occurrence rating of 'Known' or 'Likely'. *C. elegans* was opportunistically identified during the survey, however it could not be formally identified due to the	FVEMP – Section 3.6.2 Table 7 p 17 ERD – Section 6.3.3. p 28, Section 6.6.1 p 35

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			sample lacking in an intact root system. Given the location that the species was recorded within was in a span over area of the development envelope where no clearing was to occur, and the P2 status of the species at the time of reporting, no further survey work was considered necessary. Western Power acknowledges the changed conservation status of *C elegans* to Critically Endangered (State) and thus the increased protection measures required to ensure impacts to the species are minimised. AECOM have identified the following vegetation units mapped within the PDE as potentially suitable habitat for *C. elegans*: – BaXpPo – EtHsLb – BaBeAn These vegetation units generally correspond with incidences of the Banksia Woodlands PEC/TEC. Through refinement of the proposed clearing area using detailed design information, Western Power has managed to reduce the total clearing of these suitable habitats from 5.72 ha to 2.48 ha. The FVEMP already includes the requirement for a botanist to be present during the clearing of any mapped Banksia Woodland PEC/TEC within the PDE (Table 7, management action 1.4), given the Banksia Woodland TEC is representative of suitable habitat for *C. elegans* this existing control serves to minimise potential impacts to the species. Western Power will commit to conducting targeted pre-clearance flora surveys of the identified suitable habitat for *C. elegans* within the PDE. Surveys will be conducted by a suitably qualified botanist (Table 7, Management action 1.5). Western Power will also apply for an Authorisation to Take under section 40 of the *Biodiversity Conservation Act 2016* (BC Act), so that where *C. elegans* is identified as present within the clearing footprint during pre-	

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			clearance surveys, it can be removed in accordance with the BC Act. The FVEMP has been updated to include the requirement of pre-clearance surveys for areas of *C. elegans* habitat, and the ERD has been updated to reflect the changed conservation status of the species and revised avoidance and mitigation measures. The flora and vegetation survey completed by AECOM in 2023 for the Northern Terminal and Neerabup Terminal footprints within the PDE did not identify any records of *C. elegans* and no suitable habitat for the species was recorded (refer to ERD Appendix D for full report).	
12	Department of Biodiversity Conservation and Attractions	It is important to note that the definition for the take of threatened flora includes known individuals, underground tubers and seed, under section 40 of the Biodiversity Conservation Act 2016 (BC Act). If the proposal is likely to result in the take of threatened flora, early consultation between the proponent and DBCA is recommended.	Noted.	NA
13	Public	Banksia Woodlands TEC is experiencing significant historical clearing, noting approximately seventy-one percent of the original extent already lost to urban and agricultural development (Department of Environment and Energy, 2016). Additional clearing contributes to the cumulative decline of this critically threatened ecosystem. The approved conservation advice for this TEC emphasises that the long-term recovery of the community necessitates the preservation of existing high-quality remnants. Provide further assessment, including cumulative assessment for Banksia Woodlands TEC with regard for the conservation advice.	Acknowledged. Western Power's Offset Strategy includes details of the Orange Springs offset site that has been secured which contains 402.1 ha of native vegetation that is representative of the Commonwealth listed Banksia Woodland TEC. This offset site will counterbalance 100% of the Proposal's significant residual impacts to the TEC.	Offset Strategy – Section 4.1.1 p 21 and Section 4.1.3 Table 12 and Table 13 p 26-27
14	Public	The Flora and Vegetation Environmental Management Plan (FVEMP) proposes rehabilitation of temporary clearing areas; however, comments raised concerns for limited detail being provided for timeframes to achieve ecological equivalence with baseline condition. Additional justification is required to support	Western Power is unable to definitively identify areas of clearing within the PDE that can be rehabilitated after construction is completed. This is due in part to the complexity of balancing the safety and electrical clearances required for transmission lines and vegetation. This creates difficulties with developing completion	FVEMP – Section 3.6 Table 8 p 31-32

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		rehabilitation outcomes for Banksia Woodlands, noting that it can take decades to develop structural and compositional complexity (Department of Environment and Energy, 2016). The completion criteria specifies that by year ten, native species cover should reach at least sixty percent of that observed within the biological survey, with vegetation condition achieving "good" status where the original survey recorded good or better condition (Western Power, 2025a). Justification should address the discrepancy and discuss the ecological complexity and slow regeneration rates characteristic of Banksia Woodlands.	criteria that is specific to the vegetation communities being targeted as part of rehabilitation efforts, particularly if these communities are TEC/PECs. As such, the FVEMP has been revised to update the Trigger and Threshold criterion for revegetation within the PDE. Western Power is committing to completing a review of the final clearing footprint of the Proposal once construction is completed which will identify areas that can be rehabilitated. These rehabilitated areas will then have a corresponding Revegetation Management Plan developed with completion criteria specific for the targeted vegetation communities of rehabilitation efforts. This commitment has been captured in the FVEMP as Trigger criterion and Threshold criterion 10 (Table 8) and will therefore require external reporting to DCCEEW and DWER.	
15	Public	Concerns were raised for *Banksia menziesii* (and other species) contributing to the canopy of the Banksia Woodlands TEC noting that the species typically exceed three metres in height at maturity (Department of Environment and Energy, 2016). The constraint of "plant species that grow taller than three metres will not be planted" due to safety requirements (Western Power, 2025a, p. 5) likely prevents the re-establishment of the canopy layer criteria that defines the ecological community and provides critical habitat for fauna, including threatened black cockatoos. Further discussion and outcomes should be provided for rehabilitated areas for Banksia Woodlands TEC and supported values.	Noted. Western Power does not intend to rehabilitate areas within the transmission line corridor targeting vegetation communities that will impact on electrical safety clearance requirements. The Proposal has calculated the significant residual impact to Banksia Woodland TECs assuming that all clearing within the Impact Area is permanent and has provided a corresponding offset that addresses 100% of the significant residual impacts to the TEC. Please refer to the Offset Strategy for further details.	Offset Strategy – Section 2.4 Table 3 p 7
16	Public	Concerns were raised regarding the limited remnant extent and highly fragmented nature of remaining Tuart Woodlands TEC, with only approximately three percent of the original distribution remaining in good to excellent condition (Paczkowska et al., 2016). Noting that any loss of Tuart Woodland TEC likely	The area of Tuart Woodland identified with the survey is situated directly within the Neerabup Terminal which was historical sited and designed in consultation with DWER, including longitudinal layout following DWER advice on the adjacent UWPCA.	NA

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		constitutes a cumulative significant impact, additional targeted management strategies should be discussed and the FVEMP updated. It was requested the proponent demonstrate impacts to the TEC have been minimised to the maximum extent practicable including consideration for design modifications.	The conservation advice calls out to consider the surrounding context of a patch. An important part of the context is that this patch is not a naturally occurring patch of TEC. During the original construction, the site was cleared of pine plantation and revegetation undertaken afterwards in line with the site planning approval. The Tuart species that have been identified are part of past revegetation works on site. This revegetation was located within a corridor pre-set for this connection during the original approvals. Other similar areas within the yards were left vacant for similar purposes. The area is standalone within the terminal and not tied to surrounding remnant vegetation. It was therefore not deemed significant nor requiring an offset. The Tuart TEC was not contained within the original referral, however assessed as part of the s43A application whereby the EPA had assessed the change as of being substantially the same character as the original application. Western Power has also reviewed its Impact Area since publication of the ERD and reduced the clearing of the Tuart TEC from 0.59 ha to 0.44 ha.	
17	Public	The public commented that offset calculations indicate 46.97 hectares of the Orange Springs site will be allocated to offset one hundred percent of the proposal's impacts on the Banksia Woodlands TEC (AECOM, 2025). Commitments to submit and implement a revised offset strategy post approval is inconsistent with regulatory framework for offsets and offset arrangements should be in place prior to approval to ensure a high degree of certainty (Government of Western Australia, 2014).	Acknowledged. Western Power has provided a revised Offset Strategy in support of the response to public submissions which demonstrates that Western Power has secured offsets that will counterbalance 100% of the Proposal's significant residual impacts.	Offset Strategy
18	Public	Public recommendation included revegetation performance criteria for temporarily cleared areas to be updated from native cover and diversity of 60% at year ten of the baseline to 80-90% due to the high conservation value of communities proposed for impact (Society for Ecological Restoration, 2019).	Noted. Revegetation performance criteria in the FVEMP have been removed given the uncertainty of what areas will be rehabilitated and the inability to develop specific and targeted performance criteria. Western Power is committing to a review of the final clearing footprint of the Proposal once construction is completed	FVEMP – Section 3.6 Table 8 p 31-32

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			which will identify areas that can be rehabilitated. These rehabilitated areas will then have a corresponding Revegetation Management Plan developed. This commitment has been captured in the FVEMP as Trigger criterion and Threshold criterion 10 (Table 8) and will therefore require external reporting to DCCEEW and DWER.	
19	Public	Submissions identified that completion criteria for proposed rehabilitation does not consider vertical stratification, age class distribution or the presence of functionally important species. It was recommended specific structural benchmarks for canopy cover, understory density and presence of functional groups be added to revegetation criteria.	Noted. Please refer to comments in line item 18 above.	NA
20	Public	Qualitative criteria for final vegetation structure "trending towards that observed within biological survey" should be given specific measurable benchmarks to increase certainty of outcomes.	Noted. Please refer to comments in line item 18 above.	NA
21	Public	It was considered that preventing the planting of flora that grow above three meters in height prevents the restoration of ecological communities (including Banksia Woodlands TEC) within the vegetation clearance zone. Documentation should acknowledge that revegetation within the maintenance corridor will not restore ecological equivalence to pre-clearing condition, and loss of conservation values should be a residual impact.	Noted. Any future rehabilitation that may occur within the PDE has not been accounted for when considering the significant residual impacts of the Proposal. Given the uncertainty of what areas will be rehabilitated, Western Power has assumed all clearing within the Impact Area is permanent when calculating the significant residual impact and has secured offsets to counterbalance 100% of the significant residual impacts of the Proposal.	NA
22	Public	The FVEMP commits to a Hygiene management plan which achieves weed abundance within 10% of baseline levels within TECs and Bush Forever areas however, the plan states "no baseline weed monitoring has been completed" and does not specify when baseline weed surveys (and the methodology used) will be applied. Surveys should be conducted prior to construction	The Detailed Flora and Vegetation survey completed by AECOM in 2022 and 2023 included identification and mapping of weed species within the PDE. Refer to Appendix B and D of the ERD. The FVEMP has also been updated to reflect the results of these surveys. Please refer to Section 2.4.3 and Appendix D.	ERD – Appendix B and D FVEMP – Section 2.4.3 p 11 and Appendix D

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		and methods aligning with established quantitative weed assessment.		
23	Public	FVEMP references a dieback management plan requirement and the documentation states "no Phytophthora cinnamomi dieback survey has been undertaken at the time of drafting this EMP." Best practice dieback management requires comprehensive soil sampling and laboratory analysis to determine the presence and distribution of Phytophthora species prior to commencement of ground-disturbing activities (Department of Biodiversity, Conservation and Attractions, 2021).	A Dieback Survey was undertaken for the Proposal between February and July 2025, with the report and supporting Hygiene Management Plan (HMP) provided to Western Power in November 2025. The survey report and HMP have been added to the appendices of the ERD. Please refer to Appendix J and N. The FVEMP has been updated to include the results of the Dieback survey and has removed the statement that no survey has been undertaken.	ERD – Appendix J and N FVEMP – Section 2.4.3 p 12
24	Public	Uncertainty exists regarding the classification of vegetation communities and their conservation significance due to the survey conducted in 2022 by AECOM having identified several vegetation communities that were identified by less than three quadrats. Additionally, one patch of Banksia Woodland was recently burnt and (affecting composition) and historical land use made vegetation community differentiation difficult in some areas.	Noted. Western Power engaged AECOM to complete a follow up survey of the PDE in 2025 aimed at reconciling uncertainties with vegetation communities and their classification. This report is provided as Appendix F in the ERD and the results discussed in Section 6.3.3.	ERD – Section 6.3.3 and Appendix F
25	Public	Submissions recommended higher offset ratios should be applied to rehabilitation-based offsets to achieve ecological functioning in recognition of temporal lag. A ratio of three to one was suggested.	The offset ratios used will be determined by guidance documents published by relevant Commonwealth and State government departments. Please refer to: – DCCEEW offset assessment guide offset-assessment-guide.xlsm – DWER environmental offsets calculator DWER WA environmental offsets calculator	NA
26	Public	Specific management actions should be incorporated into the proposed offset to address weed invasion, altered fire regimes and climate change impacts.	Noted. The revised Offset Strategy includes commitments to on-ground threat abatement activities such as weed and fire management and climate change related impacts. As the Offset Strategy is not intended to function as a management plan, the specific management actions to address the aforementioned threats will be included in the site-specific Revegetation Management Plans developed for each Offset site.	Offset Strategy – Section 3.3.3 p 13 and Section 3.4.3 p 16

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27	Public	Additional justification was requested to demonstrate that all reasonable and practicable measures were taken to avoid and minimise impacts to threatened ecological communities, including alternative transmission line routes, additional spanning of vegetation, and refinement of proposed tower locations.	The ERD has been updated to include further details on alternatives line routes considered for the Proposal. Western Power considered different alignments and options during the early development of the Proposal, such as: – Straight line: this was not considered feasible due to the extensive social impacts, large number of private residences and existing infrastructure that would be impacted. – Undergrounding: requires significant trenching works and resulted in a greater environmental impact due to the inability to 'span over' sensitive areas with this methodology. – Utilise existing infrastructure areas and following existing transmission alignments: typically allows for favouring historically impacted, cleared and degraded areas as far as practicable, attempting to balance overall impacts to financial considerations and social and environmental values. In addition to this, since preparing the initial ERD for the Proposal, Western Power has received detailed design information that has allowed the Impact Area for the Proposal to be refined and total clearing to be significantly reduced. Table 1provided in the cover letter to this response to submissions provides the revised impact areas for the Proposal. Western Power has managed to reduce the Proposal's clearing area by approximately 48% and thus avoid impacting up to 59 ha of native vegetation. The ERD has been updated throughout to reflect the revised Impact Areas.	ERD - Section 1.3.2 p 4
28	Public	Transparent and quantitative comparison of alternative proposal layouts and corridors should be provided to support the application of the mitigation hierarchy, particularly regarding intersection with Whiteman Park.	The ERD has been updated to include further details on alternatives line routes considered for the Proposal. Western	ERD – Section 1.3.2 p 4

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			Power considered different alignments and options during the early development of the Proposal, such as: – Straight line: this was not considered feasible due to the extensive social impacts, large number of private residences and existing infrastructure that would be impacted. – Undergrounding: requires significant trenching works and resulted in a greater environmental impact due to the inability to 'span over' sensitive areas with this methodology. – Utilise existing infrastructure areas and following existing transmission alignments: typically allows for favouring historically impacted, cleared and degraded areas as far as practicable, attempting to balance overall impacts to financial considerations and social and environmental values.	
29	Public	The public found rehabilitation measures being referenced alongside offsets and without clear distinction between rehabilitation of temporarily disturbed areas and offsets required to counterbalance permanent and irreversible impacts was unclear. Revised discussion should delineate between the two with offsets being applied to residual impacts after mitigation hierarchy (including rehabilitation) in accordance with EPA guidance.	Western Power acknowledges the lack of clear distinction between rehabilitation measures and offsets within the ERD. The ERD has been updated throughout to clarify that any potential future rehabilitation will be determined at the post-construction stage and that the significant residual impacts for the Proposal have been calculated assuming the Impact Area will be permanently cleared, and the corresponding offsets required to counterbalance 100% of these significant residual impacts secured.	ERD – Section 6.5 Table 23, Section 7.5 Table 45, Section 8.5 Table 61 and Section 9.5 Table 69
Terrestrial Fauna				
1	Department of Climate Change, Energy, the Environment and Water	Clarify the proposal's impact to black cockatoo nesting trees. The ERD states two trees and the Offset Strategy States three (section 3.2.2).	Following receipt of detailed design information for the Proposal, Western Power has completed a review of the Proposal's Impact Area. The revised Impact Area submitted as part of the response to submissions package does not include any impacts to suitable nesting trees.	ERD – Section 7.6.3 p 68

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			The ERD has been updated to reflect the revised impacts to the species.	
2	Department of Climate Change, Energy, the Environment and Water	Quantify the proposal's impact to black cockatoo potential nesting trees (suitable DBH of >500mm).	The Proposal will result in the clearing of 54 potential nesting trees, none of which contain hollows or suitable hollows.	ERD – Section 7.6.3 p 68
3	Department of Climate Change, Energy, the Environment and Water	It is considered that the suitable nesting tree with evidence of recent activity is representative of a rank 2 nesting tree (BCE), noted in appendix E. Provide further avoidance for this tree or justification if avoidance is not viable for the Ranks 2 tree.	Acknowledged. The revised Impact Area submitted in support of this response to submissions no longer includes the rank 2 nesting tree. Western Power is avoiding impacts to all suitable nesting trees identified within the PDE.	ERD – Section 7.6.3 p 68
4	Department of Climate Change, Energy, the Environment and Water	The land acquisition offset site in Orange Springs has minimal land management actions proposed to counterbalance the impacts on Carnaby's cockatoo.	Acknowledged. Western Power has provided a revised Offset Strategy which includes commitments to on-ground land management actions, including: – Protect and manage important and critical habitat – De-stocking the site of livestock within 12 months of the Proposals referral approval – Undertake biennial monitoring and reporting to DBCA, DWER and DCCEEW of the condition, extent and boundaries of the TEC occurrence over a 10-year period – Demarcation of the offset site with signage – Annual monitoring for the first five years for signs of weed propagation, spread of dieback and changes in vegetation condition, with a further 5 years of monitoring with the ongoing frequency of monitoring risk assessed and revised if required. Where habitat scoring / condition is declining when compared to the SLR (2025) survey or weed spread is encroaching into intact high quality vegetation patches, then annual infill planting and/or weed control will be implemented until the condition is returned to pre-	Offset Strategy – Section 3.3.3 p 13 and Section 3.4.3 p 16

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			impacted habitat value and weeds are removed and no sign of encroachment into intact vegetation is achieved for two consecutive years. – Bi-annual removal and/or treatment of weeds identified during monitoring events – Within 12 months of the Proposal's referral approval undertake a baseline dieback survey of the site and development of a hygiene management plan if dieback is identified as present and determined to be a threat to the existing biodiversity values – Removal of any rubbish and/or refuse – Maintenance of existing boundary fencing and site access control to prevent public access. Removal of internal fencing to allow unrestricted movement of fauna – For a period of 10 years undertake annual monitoring for signs of feral animals that may be predators or affect the quality of the existing habitat, with feral animal trapping and management triggered where the monitoring identifies feral animals may degrade the existing habitat values. This includes annual monitoring and eradication of feral bees from any suitable hollows present in existing suitable nesting trees.	
5	Department of Climate Change, Energy, the Environment and Water	The offset site is not adequate to address significant residual impacts to Baudins and Forest Red Black Cockatoos due to it being beyond the extent of occurrence for both species. It is considered that the proposed offset does not adequately compensate for significant residual impacts to Black Cockatoos under the EPBC Act as it does not satisfy the principles of the EPBC Act Environmental Offset Policy (2012) (EPBC Offsets Policy). Additional offset sites for the Proposal should be secured for black cockatoos. The total quantum of the offset must reach a minimum of 100% of the residual impacts to each protected matter.	Acknowledged. Western Power has submitted a revised Offset Strategy in support of this response to submissions that outlines the offsets secured to counterbalance 100% of the significant residual impacts to black cockatoos. This is through the securement of an additional offset site in Hopeland that is within the known distribution for all three species of black cockatoo.	Offset Strategy

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6	Department of Climate Change, Energy, the Environment and Water	The EPBC Offset Policy requires additionality as a component of the offset package, most commonly seen in the form of rehabilitation or revegetation of the specific MNES species or habitat being offset. This should be incorporated in a revision.	Acknowledged. The Offset Strategy has been updated to include rehabilitation as part of the strategy Western Power will implement to offset the Proposal's significant residual impacts to MNES, in this context, Banksia Woodlands TEC and the three threatened species of Black Cockatoo. The revised Offset Strategy now includes: – Rehabilitation of 62.42 ha of cleared land at the Orange Springs site targeting a foraging habitat quality score of 6 for Carnaby's Cockatoo – Rehabilitation of 46.82 ha of degraded land at the Hopeland site, targeting a foraging habitat quality score of 7 for the three threatened species of black cockatoo – Rehabilitation of 2 ha of degraded land targeting establishment of the Low lying *Banksia attenuata* woodlands of the Swan Coastal Plain PEC (FCT21c) The ERD has also been updated to reflect the revised offset strategy.	Offset Strategy – Section 4.1.3 Table 13 and Table 14; and Section 4.2.4 Table 17 and Table 18 ERD – Section 7.5 Table 45
7	Department of Climate Change, Energy, the Environment and Water	If a revised offset strategy contains an averted loss component of the offset, this must be demonstrated via robust evidence that clearly demonstrates a decline in condition for the MNES likely to occur at the proposed offset site(s) without management intervention, and further how the MNES habitat quality would increase as a result of the management measures.	The offset calculators used to support the revised Offset Strategy do not account for averted loss, with a quality of 8 specified for the current offset quality, quality without offset and quality with offset. Threat abatement activities will be implemented at the site to reduce the risk of these threats causing a loss in habitat quality in the future. The revised Offset Strategy includes detail of the management measures that will be implemented to ensure that the quality of the vegetation/habitat at the Offset site will be maintained at its current level.	Offset Strategy – Section 3.3.3 p 13, Section 3.4.3 p 16 and Section 7.3 Table 20 p 48-49
8	Department of Climate Change, Energy, the Environment and Water	The revised offsets strategy must: a. Include a clear description of management actions and relevant information (including any assumptions) for each MNES.	Acknowledged. Western Power has submitted a revised Offset Strategy in support of this response to submissions which: a. Describes the management actions for Banksia TEC– Section 3.3.3 p 16	Offset Strategy

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		b. Targets for the offset outcome to ensure that the management actions will achieve a final completion criterion within the 20-year management period and should reflect the scoring of the impact site to meet 'like for like' outcomes under the EPBC Offsets Policy. Relevant milestone targets and completion criteria should be identified for each MNES offset outcome. c. An outline of the relevant threats and opportunities in relevant listing and conservation advice. d. Clearly identified timeframes and responsible parties that have consented/agreed to take on the responsibility. e. Provides a risk assessment and contingency measures as outlined below.	b. Includes targets for offset outcomes and completion criteria – Section 7.3 and Section 7.4 c. Outlines relevant threats and opportunities in relevant listings and conservation advice - Section 3.1, Section 3.3.3 and Section 4.1.2 d. Clearly identifies timeframes and responsible parties – Section 7.1 e. Provides a risk assessment – Section 7.3	
9	Department of Biodiversity Conservation and Attractions	It appears that the assessment of potential breeding trees with suitable hollows is limited to ground-based observations. On this basis, there is the potential that breeding trees with suitable hollows may have been overlooked during the 2022 fauna survey (AECOM 2023) and not captured in the 2025 targeted black cockatoo survey (AECOM 2025). It should be noted that, under the federal guideline (DAWE 2022), breeding habitat for threatened black cockatoo species includes all known, suitable, or potential nesting trees. In this regard, it appears that the total impact on potential breeding or nesting trees for these species from the proposal may be underestimated. It is recommended to revise the classification of black cockatoo breeding trees within the identified study area, and any potential impacts, in consultation with DBCA.	All fauna surveys completed to support the Proposal were conducted in accordance with the appropriate technical guidance, as outlined in Section 7.3.1 Table 34 of the ERD. The evaluation of survey limitations did not cite any inconsistencies with the technical guidance documents (refer to ERD – Section 7.3.2 p 52).	ERD – Section 7.3.1 Table 34 and Section 7.3.2 p 52
10	Department of Biodiversity Conservation and Attractions	Provide further information or undertake further investigations (i.e. biological surveys) to clearly identify and describe the full extent and significance (local and regional) of impacts (direct, indirect and cumulative) from the proposal on conservation significant fauna.	Whilst undertaking surveys, both targeted and baseline for SRE and conservation significant invertebrates, would provide some additional clarity regarding specific locations for occurrence and avoidance, the most likely habitats for occurrence would be the Banksia woodland habitats (this conclusion was determined by an	ERD – Section 7.3.2 p 52, Section 7.3.3 p 52 and Section 7.6.2 p 67

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			SME based on assessment of existing biological survey data and desktop assessment). Undertaking field survey increases the confidence in likelihood of occurrence rating for species, both presence and absence, however, due to many of the species' inherent scarcity in nature they are infrequently recorded even in their primary habitat, so an absence of occurrence during a targeted survey does not guarantee an absence of presence within a potential area of suitable habitat. As a result, further surveys are not likely to be beneficial to SRE species in the context of substantially changing the outcomes for the species from the implementation of the Proposal. Impacts to the species have been avoided and minimised by limiting the clearing of areas which have the highest likelihood of occurrence as a habitat for SREs and conservation significant invertebrates, being Banksia Woodland. Clearing for the Proposal will result in the removal of only 3.01 ha of the total 71.48 ha of habitat mapped within the surveyed area (Table 38 of the ERD). In consideration of the limited impacts from linear infrastructure projects to SREs, these measures implemented by Western Power will preserve the habitats of SREs and conservation significant invertebrates and minimise impacts such that there is no significant residual impact.	
11	Department of Biodiversity Conservation and Attractions	If impacts from investigations are considered to be significant, provide further information on measures to avoid, minimise and mitigate potential impacts (direct and indirect) on conservation significant fauna.	Please refer to line item 10 above.	NA
12	Department of Biodiversity Conservation and Attractions	It appears that the proponent has used an outdated dataset to map black cockatoo breeding and roosting sites within 20 kilometres of the proposal. It is recommended that the information used to map black cockatoo breeding and roosting sites is updated with contemporary data and is reassessed.	Not required. The dataset was used to inform the desktop assessment of biological surveys and the likelihood of black cockatoos occurring within the PDE. Desktop assessment results indicated the requirement for a targeted field survey for the species which was undertaken in 2022 and 2025. The species and	ERD – Appendix B, D and E

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			suitable habitat was confirmed to be present within the PDE and appropriate avoidance, minimisation and offsets have been developed in accordance with the field data obtained. Please refer to the surveys provided as Appendix B, D and E in the ERD.	
13	Department of Biodiversity Conservation and Attractions	Further assessment to the impacts on each black cockatoo should be provided with specific regard to black cockatoo longevity, low reproductive potential, time required for the formation of natural hollows (200 years) and significance of known breeding trees.	Western Power has completed a review of the Impact Area since publication of the ERD and has produced a revised Impact Area that no longer includes impacts to suitable breeding trees identified within the PDE. Offset sites for the Proposal have been selected in consideration of their foraging, roosting and breeding value to black cockatoos, with both the Orange Springs and Hopeland site containing potential nesting trees for black cockatoos.	NA
14	Department of Biodiversity Conservation and Attractions	It is noted that the black stripe minnow *Galaxiella nigrostriata* (ranked endangered) was identified as having potential habitat in wetland UFI 13956. Further information and/or investigations for this species should be provided to ascertain the significance of impacts to this species, if present.	A memorandum assessing the likelihood of the black-stripe minnow occurring within the PDE was developed by SLR and submitted as Appendix G of the ERD. The memo included a literature review and desktop study and concluded that it is unlikely that UFI 13956 represents suitable habitat for the species. Additionally, Western Power's refinement of the Proposal Impact area following receipt of detailed design information has resulted in total clearing of UFI 13956 being reduced from 4.62 ha to 0.8 ha.	ERD – Appendix G
15	Department of Biodiversity Conservation and Attractions	Any impact (direct or indirect) on threatened fauna individuals may be considered the taking and/or disturbance of threatened fauna under section 40 of the BC Act. Consequently, the proponent may require Ministerial Authorisation under the BC Act to take and disturb, or potentially take or disturb, individuals of threatened fauna.	Noted.	NA
16	Public	Concerns were raised regarding the assessment approach to black cockatoo habitat using Bamford Consulting Ecologists methods (scoring system) not being comparable to the outcome-based provisions in the TFEMP which only considering moderate and	Noted. Western Power has updated the ERD, TFEMP and Offset Strategy to include consideration of all black cockatoo foraging habitat mapped within the PDE (negligible to high quality).	NA

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		higher quality foraging habitat for offset, without consideration for the ecological importance of lower quality habitat in a context of declining foraging resources and periods of food scarcity. Department of Agriculture, Water and the Environment, 2022 has identified that black cockatoos utilise a range of habitat types depending on seasonal food availability and areas classified as lower quality can become critical resources during drought and fire events. Low and negligible quality black cockatoo habitat was recommended for inclusion in a revised offset calculation and requirement.		
17	Public	Concerns were raised regarding the impacts to suitable nesting trees and hollows for black cockatoos. Specifically, the loss of two suitable trees and three hollows is perceived as the required impact without support from environmental assessments indicating ecological acceptability. TFEMP requiring installation of artificial hollows does not specify the number to be installed, their locations or the monitoring protocols to assess their utilisation by black cockatoos. The proposed artificial nest hollow installation programme should be described in greater detail within the TFEMP to include hollow design, install methods, location selection criteria and monitoring protocols to confirm usage by target species.	Acknowledged. Since publication of the ERD, Western Power has completed a review of the Proposal Impact Area and refined the proposed clearing such that no suitable breeding trees will be cleared as part of the Proposal. As such, requirements for Artificial Nest Hollows have been removed from the TFEMP and Offset Strategy.	NA
18	Public	Cumulative loss to black cockatoo populations from incremental foraging and breeding habitat impacts have not been considered. Carnaby's Cockatoo populations estimated to have declined by more than fifty percent over three generations (Threatened Species Scientific Committee, 2018), which is not discussed with regards to cumulative significance.	Western Power has considered the cumulative loss to Carnaby's Cockatoo populations and has prepared the Offset Strategy for the Proposal in consideration of these cumulative impacts. The assessment of the suitability of the Orange Springs offset site included the regional scale benefits to the species, in accordance with the EPA's Public Advice: Considering environmental offsets at a regional scale, and have focused on a bioregion (Swan Coastal Plain), landscape scale improvement for the species, by securing land that can support increased connectivity of the fragments of supporting habitat for Carnaby's within their range across the Swan Coastal Plain.	Offset Strategy – Section 4.1.2 p 25

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19	Public	The public recognised that proposed offsets site (Orange Springs) is beyond the distribution of Baudin's and Forest Red-tailed Black Cockatoos and therefore does not adequately offset these values. Additionally, 27% of moderate quality and all low-quality values for Carnaby's cockatoo are not captured by the proposed offsets site. Commitments to submit and implement a revised offset strategy post approval is inconsistent with regulatory framework for offsets and offset arrangements should be in place prior to approval to ensure a high degree of certainty (Government of Western Australia, 2014).	Acknowledged. Western Power has prepared a revised Offset Strategy which includes an additional offset site acquired. The additional offset site provides a sufficient rehabilitation area to offset 100% of the impacts to Baudin's and Forest Red-tailed black cockatoos. In addition, the 64.2ha of cleared area at Orange Springs will be rehabilitated to offset the Proposal's significant residual impacts to Carnaby's Cockatoo foraging habitat.	Offset Strategy.
20	Public	Submissions generally support commitments to establish and rehabilitate black cockatoo foraging habitat however; uncertainty was expressed regarding timeframes for providing ecological values for foraging black cockatoos. Foraging species (eucalyptus and banksia) require years to decades of establishment to reach maturity and produce significant resources (Department of Agriculture, Water and the Environment, 2022). The assumed 10-year timeframe used in the offset calculator may not be appropriate and additional rational or revisions may be required to ensure development of structural complexity and resource productivity is achieved.	Noted. The revised Offset Strategy includes consideration of the risk of failing to meet completion criteria within the specified 10-year timeframe and outlines appropriate controls, mitigations and remediation measures.	Offset Strategy – Section 7.3 Table 20 p 48-49
21	Public	Concerns were raised regarding the ability for drone-based surveys being unable to adequately identify hollows not visible from aerial perspectives and they may not accurately measure hollow dimensions or internal characteristics of suitable black cockatoo nesting trees within the development envelope. It was recommended to utilise ground-based methods such as climbing surveys and camera inspection to provide greater certainty for black cockatoo breeding habitat.	All fauna surveys completed to support the Proposal were conducted in accordance with the appropriate technical guidance, as outlined in Section 7.3.1 Table 34 of the ERD. The evaluation of survey limitations did not cite any inconsistencies with the technical guidance documents (refer to ERD – Section 7.3.2 p 52).	ERD – Section 7.3.1 Table 34 and Section 7.3.2 p 52
22	Public	Additional justification was requested to demonstrate that all reasonable and practicable measures were taken to avoid and minimise impacts to black cockatoo habitat, including alternative	Noted. Western Power has completed a review of the proposed Impact Area since publication of the ERD and reduced the total clearing of black cockatoo foraging habitat from 188 ha to 100.5	ERD – Section 7.6.3

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		transmission line routes, additional spanning of vegetation, and refinement of proposed tower locations.	ha. All suitable nesting trees have also been avoided in the revised Impact Area.	
Inland Waters				
1	Public	The Inland Waters Environmental Management Plan (IWEMP) states "dewatering will pose a significant risk to mapped GDEs as the drawdown contours do not extend outside of the cleared footprint, meaning any potentially impacted vegetation from the effects of drawdown will have been cleared for construction". However, this statement conflates two distinct forms of impact and does not adequately address potential impacts to adjacent groundwater-dependent ecosystems. Impacts should be further discussed and specific consideration (and management) proposed for adjacent groundwater dependant vegetation.	Impacts to adjacent GDE are not expected to be significant as if any dewatering activities are determined to be required for tower construction, they will be for a limited duration (approx. 1 week) and only for areas where the groundwater occurs less than 1m below ground level. Pre-liminary assessment of publicly available records for the baseline groundwater level in the region indicates that the groundwater level generally sits below 5mbgl and is unlikely to be intercepted as part of tower construction. Geotechnical works for tower locations that have been completed to date not identified the requirement for dewatering. The IWEMP includes provision for detailed groundwater baseline monitoring to be undertaken if dewatering is to occur (Management action 1.2) and for a post-construction monitoring and analysis to be completed for tower locations where dewatering has occurred (Trigger/Threshold 5).	IWEMP – Section 3.6 Table 5 and Table 6
2	Public	The IWEMP was recognised to propose baseline groundwater monitoring at tower locations where dewatering will occur and post-construction monitoring to assess whether construction activities have resulted in significant impacts to groundwater quality however, the management plan does not propose ongoing monitoring of groundwater levels or vegetation health in adjacent groundwater-dependent ecosystems. A comprehensive groundwater monitoring programme is recommended to be implemented to assess impacts of dewatering on adjacent groundwater-dependent ecosystems. Monitoring should include measurement of groundwater levels and vegetation health parameters in Banksia Woodland and wetland vegetation adjacent to tower locations where dewatering occurs, with	The IWEMP includes provision for detailed groundwater baseline monitoring to be undertaken if dewatering is to occur (Management action 1.2) and for a post-construction monitoring and analysis to be completed for tower locations where dewatering has occurred (Trigger/Threshold 5).	IWEMP – Section 3.6 Table 5 and Table 6

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		monitoring continuing for at least three years following construction to capture any delayed or cumulative impacts.		
3	Public	Submissions identified that no contingency measures would be implemented if acid sulfate soils (ASS) are encountered in medium risk locations during construction. Considering the risk of surface and groundwater acidification, metal mobilisation, flora and fauna mortality the IWEMP should include clear triggers for implementing ASS management measures, including specific treatment and measures that would be employed.	The IWEMP includes provision for soil testing to be undertaken if dewatering is to occur at both high and medium risk tower locations (Management action 1.3). Where this soil testing indicates high risk areas for ASS, Management action 1.4 requires an ASS Management Plan to be developed to manage construction risks associated with the presence of ASS.	IWEMP – Table 5 p 16
4	Public	It was identified that the IWEMP includes limited discussion for the ecological functions performed by wetlands proposed for impact. Potential downstream impacts of clearing wetland vegetation should be included in the plan and any related management measures.	Potential downstream impacts from clearing of wetlands may include erosion and sedimentation. The IWEMP management action 1.12 commits to erosion and sediment controls during construction. In addition, Western Power has significantly reduced its proposed impacts to wetlands following refinement of the Proposal Impact Area using detailed design information. A total of 12.3 ha of wetlands will be impacted, a reduction of over 50% from the initially proposed 25.08 ha.	NA
5	Public	The significance of Conservation Category Wetlands in Western Australia was recognised for conservation and ecological value and additional assessment requested, including detailed consideration of further mitigation measures such as further avoidance and minimisation of impacts to high-value wetland areas.	Noted. The revised Impact Area submitted by Western Power as part of its response to submissions includes reduced clearing of Conservation Category Wetlands (CCWs). Western Power proposes to span over a significant portion of the CCWs within the PDE, resulting in a reduction in the proposed Impact Area from 4.62 ha to 0.8 ha.	NA
6	Public	It was recognised that "approximate depth to water table was used in the dewatering risk assessment for tower construction sites" and "site investigations undertaken after a dry winter period; groundwater levels could rise by 1.5 meters higher than measured following periods of heavy rainfall" (IWEMP) introduces uncertainty to the dewatering impact assessment. A 1.5-meter increase in groundwater level would alter the depth to water table for multiple tower locations and alter the risk classifications.	The NREP Inland Water Assessment and ASS and Dewatering Management (Tetra Tech, 2025) sourced groundwater depths from DWER's online available dataset – *Gnangara Jandakot Depth to Groundwater (Contours) – 2019 Max (DWER-096)* extrapolated over the tower polygon. As per Management action 1.2 of the IWEMP groundwater standing water level will be assessed pre-construction and a	IWEMP – Table 5 p 16

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		It was recommended to update and incorporate the assessment with data collected during winter high water table conditions to predict dewatering impacts and inform risk of tower locations.	groundwater monitoring program developed if baseline data indicates one is required.	
7	Public	Contingency management measures were recommended to be established in precaution of actual dewatering (and associated impacts) exceeds the modelled predictions.	Outcome based provisions and trigger criteria have been developed to provide a warning if the outcome may not be achieved. Contingency actions for these have been included in Table 6 of the IWEMP.	IWEMP – Table 6
Social Surroundings				
1	Department of Planning Lands and Heritage	The DE intersects with two Aboriginal Heritage sites; Bennett Brook: in toto (ID 3692) and South Ballajura Camp (ID 3426). Based on current information, approvals under the Aboriginal Heritage Act 1972 (AH Act) are required. Should avoidance measures be able to relocate works outside of these sites, approval would not be required.	Noted. As per the recommendations in the Archae-Aus Aboriginal Archaeological and Ethnographic Assessment (2024) completed for the Proposal, Western Power should seek approvals under the AH Act given avoidance measures to relocate the works outside these areas is not possible. Western Power has submitted a section 18 consent to undertake works on land which may impact the Aboriginal Heritage Sites identified within the PDE.	NA
2	Department of Planning Lands and Heritage	When seeking approval under the AH Act, the proponent should provide the results from the engagement, archaeological and ethnographic surveys.	Noted. Relevant supporting information was provided through the section 18 approval process. This included the relevant archaeological and ethnographic heritage report, correspondence between Western Power and DPLH and SWALSC regarding heritage approval advice, and correspondence with the Whadjuk Aboriginal Corporation notifying them of the forthcoming submission.	NA
Consultation				
1	Department of Planning Lands and Heritage	It is noted that the Alkimos steel trunk main is currently being constructed within the vicinity of Neerabup terminal. Consultation is recommended with Water Corporation and the Alkimos Trunk Main Alliance to address any potential conflicts.	Noted.	NA
2	Department of Biodiversity	The proponent should further consult with DBCA and the Department of Water and Environmental Regulation (DWER) on the possible conservation offset measures aimed at mitigating	Noted. Negotiations are ongoing with DBCA Land Service Unit.	NA

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	Conservation and Attractions	significant residual impacts, noting the intention to transfer ownership of the offsets site to DBCA		
3	Public	Public requested clarification if consultation included prominent community groups including the Conservation Council WA and Urban Bushland Council.	Western Power focused consultation on stakeholders directly impacted by the Proposal, as identified in Section 3.1 of the ERD. Indirectly impacted stakeholders and other interested parties were able to comment on the Proposal during the public comment period via the EPA website and advertising of the Proposal via the Western Power website on the 4 December, publication of the Proposal in the West Australian on 8 December and provision of hard copies of the ERD at the State, Wanneroo and Ballajura libraries. Noting the feedback from the public, Western Power will add prominent community groups such as the Conservation Council WA and Urban Bushland Council to its stakeholder engagement plan, to be consulted as a directly impact stakeholder for future relevant Proposals.	NA
Other				
1	Department of Climate Change, Energy, the Environment and Water	The updated Offset Strategy must include a risk assessment and associated corrective actions, including, but not limited to the initial risk description (including relevance to the site and MNES) and risk rating. Risks of particular note may include (but not be limited to): a. Biophysical risks e.g. drought, fire, flood, frost, locust plague. b. Project management risks e.g. seeds are not available when required, seedlings and/or tubestock of locally endemic black cockatoo foraging species are not available. c. Technical risks e.g. the revegetation technique is not effective for the local environment, the non-CBC foraging species planted outcompete the CBC foraging species.	Acknowledged. A revised Offset Strategy has been prepared which includes a section on risks management and remedial actions.	Offset Strategy Section 7.3 Table 20 p 48-49

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		d. Governance risks e.g. there is an obstacle affecting putting a conservation covenant on the land.		
2	Department of Climate Change, Energy, the Environment and Water	The updated Offset Strategy must include clear risk management and response commitments (contingency actions and trigger/s for each risk).	Acknowledged. A revised Offset Strategy has been prepared which includes a section on risks management.	Offset Strategy Section 7.3 Table 20
3	Department of Climate Change, Energy, the Environment and Water	The updated Offset Strategy must include risk monitoring arrangements.	Acknowledged. A revised Offset Strategy has been prepared which includes a section on risks management.	Offset Strategy Section 7.3 Table 20
4	Department of Climate Change, Energy, the Environment and Water	The updated Offset Strategy must include an outline of the responsible parties who will manage each risk and contingencies.	Acknowledged. A revised Offset Strategy has been prepared which includes a section on risks management.	Offset Strategy Section 7.3 Table 20
5	Department of Climate Change, Energy, the Environment and Water	The updated Offset Strategy must include appropriate contingency actions and trigger/s for each risk.	Acknowledged. A revised Offset Strategy has been prepared which includes a section on risks management.	Offset Strategy Section 7.3 Table 20
6	Department of Climate Change, Energy, the Environment and Water	The updated Offset Strategy must include discussion of any uncertainties regarding the predicted risks.	Acknowledged. A revised Offset Strategy has been prepared which includes a section on risks management.	Offset Strategy Section 7.3 Table 20
7	Department of Climate Change, Energy, the	It is noted the proponent intends to transfer land management of the offset site (Orange Springs) to DBCA. The agreement of any third parties associated with the offset arrangement (excluding	Acknowledged. A revised Offset Strategy has been prepared which includes a section on the management framework for offsets, with	Offset Strategy Section 7

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	Environment and Water	contractors) must be described and provided in writing. The proponent must update the Offset Strategy to include discussion of the legal mechanism of securement and address monitoring, and governance arrangements for the offset, including: a. Roles and responsibilities of each party to the offset arrangement. b. The legal arrangement that will operate between the parties, preferably including the signed agreement. c. Clearly articulate an effective monitoring regime that includes, as a minimum: i. At least one indicator for each target to be achieved. For complex targets, multiple indicators should be provided (e.g. high-quality Banksia Woodlands TEC). ii. A clear monitoring methodology for each commitment (e.g. field survey, documented site inspection, etc) and anticipated timing. iii. Identify where monitoring may trigger remedial action (e.g. to manage an identified risk).	details on responsible parties, monitoring and auditing requirements and risk management.	
8	Department of Climate Change, Energy, the Environment and Water	Describe the offset strategy audit and review process including: a. A list of expected reports such as monitoring; environmental incidents; non-compliance; corrective action and auditing, etc). b. An outline description of the standard report content expected. c. The schedule or triggers for preparing a report. d. Who the report is provided to (including but not limited to DCCEEW). e. Document control procedures.	Completed. The revised Offset Strategy prepared includes a section outlining the audit and review process for the strategy.	Offset Strategy – Section 7.2
9	Department of Biodiversity	It does not appear that strategies to manage risks and impacts on Conservation and Land Management Act 1984 (CALM Act) land	The FVEMP has been prepared to support the construction and operation of the Proposal.	FVEMP – Section 3.6 Table 7

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	Conservation and Attractions	values and uses namely Gnangara-Moore River State Forest) from the proposal have been adequately addressed. Specifically, risks, impacts and proposed management measures associated with increased fire incidence, the introduction and spread of weeds and pathogens (e.g. Phytophthora dieback) and potential impacts on cultural heritage and wetland values.	Management targets 1-3 in Table 7 of the FVEMP detail management actions that will be implemented to minimise risk of fire and the introduction and spread of weeds and pathogens to native vegetation within the PDE. This is inclusive of the Gnangara-Moore River State Forest areas and wetland areas that intersect the PDE. Management action 1.6 has been added which outlines controls for minimising impacts to the culturally significant flora species *Nuytsia floribunda* identified within the PDE.	
10	Department of Biodiversity Conservation and Attractions	Provide further information regarding proposed offsets, specifically to clarify and describe the full quantum of significant residual impacts proposed to be counterbalanced by proposed offsets.	Completed. A revised Offset Strategy has been prepared to support this response to public submissions which includes describes the full quantum of significant residual impacts and how the offsets will counterbalance 100% of these residual impacts.	Offset Strategy
11	Public	Concerns were raised regarding limitations to the cumulative impact assessment whereby consideration for extensive historical clearing of the Swan Coastal Plain, ongoing urban expansion, infrastructure development, agricultural intensification are not discussed or incorporated to assessment. It was also recommended to consider any information not publicly available in consultation with regulatory agencies.	Noted. The EPA's cumulative impact framework emphasises that cumulative significance is context dependent. In this case, the NT–NBT Line is situated within a historically cleared and urbanised landscape, where the majority of land is already used for residential and infrastructure purposes. Its incremental impact is therefore limited. Overall, the NT–NBT Line represents a low-impact, high-benefit infrastructure investment that aligns with broader planning, sustainability and energy transition goals for the region.	NA
12	Public	Offsets are deferred to a later stage without sufficient information to demonstrate feasibility, policy compliance, or alignment with contemporary regulatory expectations. Offsets should adequately address the requirement for environmental offsets under the Western Australian Environmental Offsets Policy and associated EPA guidance.	Acknowledged. A revised Offset Strategy has been prepared to support this response to public submissions which demonstrates that Western Power has secured sufficient offsets to counterbalance 100% of the significant residual impacts of the Proposal. Section 6 of the Offset Strategy demonstrates how the offsets meet the State and Commonwealth Environment Offsets Policy Principles.	Offset Strategy – Section 6
13	Public	Offsets should be clearly and specifically discussed to identify the quantum of offset for each value needed, requirements for	Completed. A revised Offset Strategy has been prepared to support this response to public submissions which includes	Offset Strategy

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		proposed offsets, type of offset delivery and rationale for how proposed offsets achieve like-for like ecological outcomes.	describes the full quantum of significant residual impacts and how the offsets will counterbalance 100% of these residual impacts.	
14	Public	Concerns were raised regarding the calculated offsets for Banksia Woodlands and black cockatoos based on the assessment's assumption that remnant vegetation at offset sites maintaining current quality without active management intervention. The risks of weed invasion altered fire regimes, climate change and edge effects should be considered and the capacity for DBCA conservation estate to maintain existing quality.	Acknowledged. Western Power has provided a revised Offset Strategy which includes commitments to on-ground land management actions, including: – Protect and manage important and critical habitat – De-stocking the site of livestock within 12 months of the Proposals referral approval – Undertake biennial monitoring and reporting to DBCA, DWER and DCCEEW of the condition, extent and boundaries of the TEC occurrence over a 10-year period – Demarcation of the offset site with signage – Annual monitoring for the first five years for signs of weed propagation, spread of dieback and changes in vegetation condition, with a further 5 years of monitoring with the ongoing frequency of monitoring risk assessed and revised if required. Where habitat scoring / condition is declining when compared to the SLR (2025) survey or weed spread is encroaching into intact high quality vegetation patches, then annual infill planting and/or weed control will be implemented until the condition is returned to pre-impacted habitat value and weeds are removed and no sign of encroachment into intact vegetation is achieved for two consecutive years. – Bi-annual removal and/or treatment of weeds identified during monitoring events – Within 12 months of the Proposal's referral approval undertake a baseline dieback survey of the site and development of a hygiene management plan if dieback is identified as present and determined to be a threat to the existing biodiversity values	Offset Strategy – Section 3.3.3 p 13 and Section 3.4.3 p 16

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			– Removal of any rubbish and/or refuse – Maintenance of existing boundary fencing and site access control to prevent public access. Removal of internal fencing to allow unrestricted movement of fauna – For a period of 10 years undertake annual monitoring for signs of feral animals that may be predators or affect the quality of the existing habitat, with feral animal trapping and management triggered where the monitoring identifies feral animals may degrade the existing habitat values. This includes annual monitoring and eradication of feral bees from any suitable hollows present in existing suitable nesting trees.	
15	Public	Concerns were raised for the lack of security measures to ensure protection and delivery of yet to be identified offset sites. The Western Australian Environmental Offsets Guidelines specify that offset proposals must include details of the mechanism for securing offset sites in perpetuity. The security arrangements for all offset sites should be clearly specified, including details of land tenure change, conservation covenants, or other legally binding mechanisms that will ensure long-term protection and management in perpetuity.	Acknowledged. A revised Offset Strategy has been prepared to support this response to public submissions which demonstrates that Western Power has secured sufficient offsets to counterbalance 100% of the significant residual impacts of the Proposal. Section 7 of the Offset Strategy outlines the management framework and intended arrangements for land tenure changes to ensure long-term protection and management of in perpetuity.	Offset Strategy – Section 7
16	Public	Concern was raised for the lack of demonstration for regional scale offsets and contribution to long term conservation outcomes, specifically how offsets could contribute to landscape connectivity, regional conservation priorities or complementation of existing conservation estate and biodiversity strategies.	Western Power has considered the cumulative loss to Carnaby's Cockatoo populations and has prepared the Offset Strategy for the Proposal in consideration of these cumulative impacts. The assessment of the suitability of the Orange Springs offset site included the regional scale benefits to the species, in accordance with the EPA's Public Advice: Considering environmental offsets at a regional scale, and have focused on a bioregion (Swan Coastal Plain), landscape scale improvement for the species, by securing land that can support increased connectivity of the fragments of supporting habitat for Carnaby's within their range across the Swan Coastal Plain.	Offset Strategy – Section 4.1.2 p 25

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17	Public	Concern was raised regarding the proposed reporting methods for EMPs whereby monthly reports being provided by contractors to Western Power may cause delays in notifying the EPA and DCCEEW of non-compliances and rectification due to the proposed yearly compliance report.	Acknowledged. The timeframes for reporting have been derived based on an assessment of risk and construction methodology and are considered to be appropriate. The EMPs have all be updated to provide more specificity around the timeframes which the contractor must report a trigger or threshold exceedance to Western Power. The standard response is for the contractor to notify Western Power of an exceedance within 24 hours, with a report on the subsequent investigation to be provided within 14 days of the identification of the exceedance, Breaches of threshold criterions set in each EMP constitute an externally reportable incident and require notification to Western Power within 24hours of the incident occurring. Additionally, Western Power commits to external notification to regulatory bodies, such as EPA and DCCEEW, will be done in accordance with the conditions specified in associated approvals, Inclusion of timeframes for reporting breaches of approval conditions within the associated approval is standard practice.	NA.
18	Public	Consideration should be made for more frequent routine monitoring to detect early potential exceedances of management criteria noting that the linear nature of the clearing will likely result in rapid progression of clearing. It was recommended to undertake weekly inspections of clearing boundaries adjacent to significant environmental values instead of monthly.	Acknowledged. The monitoring frequency has been derived based on an assessment of risk, construction methodology and efficacy of proposed controls and is considered appropriate.	NA
19	Public	Concerns were raised regarding the absence of climate change considerations. Specifically, the compounding impacts of the proposal with climate change exacerbating fragmentation, fire regime changes, decreased water availability of vegetation and habitats and the long-term viability of proposed offsets should consider the pressures of climate change and be reflected in active management measures for maintaining offset outcomes.	Noted. The revised Offset Strategy includes consideration of the risk of climate change to meeting completion criteria and will be similarly addressed in the Revegetation Management Plans developed for each offset site.	Offset Strategy – Section 7.2

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20	Public	Offset monitoring was recommended to continue for a minimum of 20 years, measured against clear performance benchmarks with contingency measures to maintain ecological condition.	Noted. Western Power considers 10 years sufficient to meet its Offset Strategy objectives. However, if objectives are not met within 10 years, then it will trigger remedial actions to be undertaken until objectives are met.	NA
21	Public	It was requested that annual compliance reports be made available publicly for community and stakeholder information on environmental performance. Reports should include data on clearing extents, monitoring results, management actions and assessment of progress to achieving environmental outcomes.	Noted. Publishing compliance reports will be managed in accordance with the conditional requirements of the Referrals approval documents.	NA
22	Public	The public raised queries to better understand the need for the proposal including specific questions for additional justification for the proposal to be implemented, where additional renewable sources are likely to come from to access the upgraded capacity between Northern and Neerabup terminals and if a strategy exists for rollout of displacement of fossil fuels which the proposal forms a part of.	The Proposal is part of the South West Interconnected System Transmission Plan, which sets out the State Government's vision for Western Power's transmission network and builds on the extensive modelling and system planning carried out in the Whole of System Plan 2020, the South West Interconnected System Demand Assessment: 2023 and 2024, and the South West Interconnected System Planning Update. These Plans are publicly available on the WA government website and Western Power website: The South West Interconnected System Transmission Plan: A Future-Ready Transmission Network for WA's Main Electricity System Clean Energy Link Program Clean Energy Link - North | Clean Energy Link Program | Let's Talk Power The Whole of System Plan SWIS Demand Assessment The text in the ERD has also been updated to reference these overarching documents.	ERD – Section 1.3.1 p 4
23	Public	Public queried if an alternative to upgrade capacity of existing towers was feasible.	Upgrading capacity of existing towers is not feasible. The network in region is at capacity and cannot support additional transmission	NA

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			lines due to electrical safety requirements and engineering restrictions.	