JACKSON ENVIRONMENT AND PLANNING
STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT

Kariong Sand and Soil Supplies
Response to Submissions Plan second EIS October 2020

No.	Issue	Agency	Comment	How addressed
1	Water management	DPIE	The Department reiterates its previous concerns about the effectiveness of the proposed floating wetland for water treatment. The Department notes Section 7.10 of the WCIA states: *we note that we have not modelled the benefit of the proposed floating wetlands in the MUSIC model because it is believed that the science behind the FTWs is still in its infancy and needs further research under a broader range of conditions before the models being considered rigorous. Research to date has not measured the performance under a configuration such as the one proposed in this project where the pond is also used for stormwater harvesting. In conclusion, at this time, there is a lack of suitable scientific data available with which to model FTWs as proposed on this project. Results in this report are therefore to be considered somewhat conservative.* Considering these uncertainties and that the water treatment pond would treat both a mix of clean stormwater and leachate, please include justification and evidence the proposed floating wetland is suitable and effective in treating the collected water in the RtS. Furthermore, please clarify what is meant by the results of the WCIA are "considered somewhat conservative".	The floating wetlands has been removed from the stormwater treatment system design. See Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4)

No.	Issue	Agency	Comment	How addressed
2	Water management	DPIE	The Department notes Figures 2.5 and 2.6 of the Somersby Industrial Park Plan of Management show the southern part of the site is covered by Hawkesbury Coastal Banksia Woodland, sandstone hanging swamps and heaths, and exposed Hawkesbury Woodland which provides significant habitats. The WCIA states the proposed water treatment pond would discharge to Kangoo Road via the retained bushland eight times per year. The Department reiterates its previous concerns about the potential impacts of discharging water on the ecological value of the retained bushland and downstream receivers and water users. Unlike recycled water used on-site which would be treated by a stormwater treatment plant, the only treatment for discharged water would be the water treatment pond comprising an OSD basin and a floating wetland. The WCIA only includes water quality criteria for recycled water to be used on-site and did not provide an appropriate monitoring program including all pollutants of concern and relevant criteria for the discharged water as requested by the Department in its SEARs and previous adequacy review comments. Further, considering the uncertainty of the effectiveness of the floating wetland, please ensure a downstream impact assessment and a monitoring program including all pollutants of concern and relevant criteria is included in the RtS.	The OSD basin design has been redesigned to a controlled pump-out system. This will ensure only high quality water meeting ANZECC guideline requirements is discharged under normal circumstances. Based on historical rainfall patterns, it is estimated the number of uncontrolled discharges will be reduced to three times per year. The floating wetland has been removed from the OSD basin design. The EIS included a commitment to ongoing water quality monitoring. It is anticipated that this will be a condition of the Environment Protection Licence for the site, as it is for all similar facilities. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4).

No.	Issue	Agency	Comment	How addressed
3	Water management	DPIE	The Department previously requested clarification of the triggers for water to discharge from the water treatment pond. The WCIA only states the frequency has been reduced from 25 to 8 times per year but does not provide clarification of the trigger. Please provide the trigger in the RtS.	The OSD basin design has been redesigned to a controlled pump-out system. This will ensure only high quality water meeting ANZECC guidelines is discharged under normal circumstances. Based on historical rainfall patterns, it is estimated the number of uncontrolled discharges will be reduced to three times per year. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4).
4	Water management	(DPIE) Water and the Natural Resources Access Regulator (NRAR)	Post Approval - The proponent should include a Groundwater Monitoring and Management Plan in an updated version of the Soil and Water Plan for the operation of the proposed site and provide it to the DPIE - Water for review.	This is already a recommendation in the Baseline Groundwater Investigation, provided at Appendix K of the second EIS. It was also a stated commitment in section 18.6 of the second EIS. Groundwater monitoring is normally a condition of the Environment Protection Licence for waste facilities. It is anticipated that details of any monitoring program will be negotiated with NSW EPA as part of the application for an EPL.

No.	Issue	Agency	Comment	How addressed
5	Water management	DPIE Biodiversity Conservation Division	Insufficient information has been provided to assess the site water balance. The proponent has used the MUSIC water quality modelling software to assess the quality of water discharged from the site. The MUSIC-link modelling results report and the MUSIC file (*.sqz) are required to assess the adequacy of the modelling parameters and the validity of the site water balance. Evapotranspiration losses appear to have been underestimated. The evaporation loss calculations in Section 6.1.3 of the Water Cycle Impact Assessment and Soil and Water Management Plan (Appendix I) suggests annual losses of around 46 megalitres (ML), based on a 905mm/annual evaporation depth over an area of 5.1 hectares. However, Table 15 states that the post-development losses are 34ML. The site water balance may not have correctly modelled water harvested from the detention pond for dust suppression. The assessment states that stockpiles will be irrigated to suppress dust. Excess water will drain through the stockpiles to the impermeable geomembrane liner underlying the site and return to the pond. The circulation of irrigation water is not shown in the post development MUSIC model configuration diagram (Figure 7). Recommendation: BCD requests that the proponent provide the MUSIC-link modelling results report and the MUSIC file (*.sqz) for review. The proponent should also review the post-development evaporation losses and harvested water values used in the water balance.	For a detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4).

No.	Issue	Agency	Comment	How addressed
6	Water management	DPIE Biodiversity Conservation Division	A maintenance manual is required for the bioswales, floating wetlands and the water quality pond. Grassed bioretention swales, a floating wetland and a water quality pond have been included in the surface water treatment system for the proposal. The swales and the pond are designed to be a depositional tool and over time, their depth will reduce due to sedimentation and maintenance will be required to reinstate their design depths. The floating wetland will require ongoing removal of weeds and rubbish and inspection of the anchoring system. Maintenance staff will be required to conduct on-going monitoring, maintenance and management of the proposed system. Recommendation: BCD recommends that the proponent develops a maintenance manual that instructs plant operators how to maintain the bioswale, water quality pond and floating wetland and keep them functioning through the life of the facility.	It is anticipated that detailed operational matters will be dealt with as part of the Environment Protection Licence. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4).

7	Water management	NSW EPA	In addition to comments the EPA provided to you on 6 November 2020, the EPA makes the following additional comments on the Water Quality Impact Assessment (WQIA). The WQIA refers to the construction and use of Floating Treatment Wetlands to treat or improve water quality prior to discharge. The EPA is concerned about the lack of evidence about the ability of the Floating Treatment Wetland to carry out its intended function. This is highlighted in the following statements taken from the WQIA: "We note that we have not modelled the benefit of the proposed floating wetlands in the MUSIC model because it is believed that the science behind the FTWs is still in its infancy and needs further research under a broader range of conditions prior to the models being considered rigorous. Research to date has not measured the performance under a configuration such as the one proposed in this project where the pond is also used for stormwater harvesting. Research to date has focussed on measuring performance in a water quality pond where the water level was mostly static. In this project the water level in the pond will fluctuate considerably." "In conclusion at this time there is a lack of suitable scientific data available with which to model FTWs as proposed on this project. Results in this report are therefore to be considered somewhat conservative." In carrying out its licensing function, the EPA must consider the pollution caused or likely to be caused by the activity and the likely impact of that pollution on the environment in accordance with section 45 of the Protection of the Environment Operations Act 1997.	The floating wetland has been removed from the OSD basin design. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4).

No.	Issue	Agency	Comment	How addressed
			Therefore, the EPA requires additional information (I.e. proof of concept) from the applicant in respect of the proposed Floating Treatment Wetland and its ability to prevent, control, abate or mitigate pollution caused by the construction and operation of the proposed waste facility.	
8	Water	NSW EPA	Consistent with advice previously provided by the EPA, residual risks to water quality can be appropriately managed through conditions of consent. The EPA has updated the previously recommended conditions of consent to reflect the updated terminology in the June 2020 report. The following conditions of approval are recommended to manage residual soil and water quality risks: 1. The southern portion of the site (approximately 4ha) will remain as an undeveloped, vegetated buffer during the life of the facility. 2. The fate and potential impacts of any leachate from inside the warehouse is considered and appropriately managed (such as an internal sump).	Noted. Noted. However, the water management system is not dependent on any further polishing or treatment of discharge water by the bushland. There are four drainage inlet pits location on the eastern side of the warehouse (see RGH Stage 1 Plan H101) that are fitted with electrically activated butterfly shut off-valves that will act as sumps. Butterfly valves are activated in the event spill or fire. Pits are connected to wash down bay oil/water separator if any wash water is generated within the warehouse. The oil/water separator will be connected to sewer (see RGH Stage 1 Plan H201 – Appendix 10).

No.	Issue	Agency	Comment	How addressed
9	Water	NSW EPA	Prior to construction the applicant must prepare a Soil and Water Management Plan including, but not be limited to: a. maintenance and inspection schedules of water quality treatment measures b. inspection of the 'floodplain' downstream for erosion following each overflow event c. a Trigger, Action, Response Plan with contingency measures to be implemented if water quality triggers are reached or other unpredicted impacts (such as the formation of erosional channels or contamination of soils) and to ensure corrective actions are implemented.	Noted. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4)
10	Water	NSW EPA	4. Prior to construction the applicant must prepare a soil and water quality monitoring program in consultation with the EPA including but not limited to: a. soil and water quality monitoring locations b. analyte list and sampling frequency for each monitoring location c. the sampling method for each location d. the method of analysis for each analyte (as per Approved Methods for the Sampling and Analysis of Water Pollutants in NSW, 2004) and practical quantitation limit e. a Trigger, Action, Response Plan detailing water quality triggers and operational responses for exceedances.	Noted. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4).
11	Water	NSW EPA	5. The applicant must prepare and submit for approval a Water Quality Validation Programme within six months of operation commencement to confirm that residual sediment and water quality is consistent with appropriate state and national guidelines (such as the Environmental Guidelines: Use of Effluent by Irrigation' (DECC 2004) and the ANZECC/ARMCANZ (2000) long-term irrigation criteria)	Noted. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4)

No.	Issue	Agency	Comment	How addressed
12	Water	NSW EPA	6. The applicant must conduct surface water monitoring and prepare ongoing annual reports to demonstrate that mitigation measures are effective as expected volumes of waste processed on site increases.	Noted. For a more detailed response to this comment, see Water Cycle Impact Assessment – Response to Submissions: Supplementary Report A (Appendix 4)
13	Waste processing	DPIE	The Department has identified discrepancies in waste processing as described in the amended EIS and the Waste Management Plan (see Attachment 2). Please provide a clear waste processing description in the RtS.	Minor inconsistencies will be corrected in an updated Waste Management Plan. The waste management plan provides more details than the EIS. Recommend same details in the WMP be used in the EIS to avoid any misinterpretation by DPIE.
14	Waste processing	DPIE	Please clarify if waste delivery vehicles and landscaping/aggregate supply vehicles are owned and operated by the Applicant or by contractors. Should the vehicles be operated by contractors, please clarify what measures are proposed to track and schedule the arrival and departure of vehicles to ensure vehicle queuing on Gindurra Road would not occur.	Vehicles operated by the applicant and contractors will use the site. Significant on-site queueing capacity within the site to avoid impacts on Gindurra Rd. Queuing issues have been addressed in the Traffic Technical Note at Appendix 7.
15	Waste processing	DPIE	The Department notes the WMP states that soil loads that meet the criteria for Excavated Natural Materials (ENM), will be either sold unprocessed as ENM, or blended and processed with other soil materials to produce manufactured soils. The EPA submission on the original development (dated 25 March 2019) states that any material that has been processed cannot be considered ENM. The EPA considers that processing ENM significantly increases the risk for contamination and encourages poor practices such as blending contaminated materials with cleaner waste streams. The WMP does not address the EPA comments. Please confirm that no ENM will be processed/blended on-site in the RtS and provide an updated WMP accordingly.	The Waste Management Plan has been updated to remove references to blending ENM to produce manufactured soils to customer specifications. See Waste Management Plan at Appendix 11.

No.	Issue	Agency	Comment	How addressed
16	Waste processing	DPIE	The Department notes Section 6.3.2.2 of the amended Environmental Impact Statement (EIS) and Section 3.2.2 of the WMP include standard inspection requirements described in Section 1.2 of Standards for Managing Construction Waste in NSW (EPA, April 2019) which is not specific for the proposed operation. Please provide development specific inspection requirements and clarify following matters: A) should the entire load be rejected after unloading, how will it be loaded back to the vehicle? B) would only one vehicle load be inspected at the Tip and Spread building at any given time or would be multiple loads be inspected simultaneously? C) should multiple loads be inspected simultaneously, and one load need to rejected, please clarify how the Applicant will ensure the non-conforming waste load would be separated from other loads in the Tip and Spread Building.	More detail on the waste receiving, inspection and acceptance procedure has been provided in the updated Waste Management Plan. It is anticipated details of operational matters will be further dealt with as part of the application for an Environment Protection Licence. See Waste Management Plan at Appendix 11.
17	Air quality	DPIE	Please include a table of 24-hour concentrations of PM2.5 and PM10 (background, incremental, and cumulative) at all receivers in the Air Quality Impact Assessment (AQIA) which is similar to Table 21 of the AQIA.	A table is included in the Air Quality Impact Assessment Addendum at Appendix 5.

No.	Issue	Agency	Comment	How addressed
18	Air quality	DPIE	The AQIA only provides a brief silica dust impact assessment as follows: *adjustment of the annual average PM2.5 modelling results to account for the potential worst-case silica content of processed materials (67%) results in a predicted incremental RCS concentration at the worst affected receptor of 0.28 µg/m3 which represents >10 % of the criterion. Even with the addition of a background concentration of 0.7 µg/m3, the maximum RCS concentration is less than one third of the Victorian EPA and the California EPA Office for Environmental Health Hazard Assessment annual average criterion of 3 µg/m3.* please provide a table of incremental and cumulative concentrations of respirable crystalline silica at all receivers to justify the project will not negatively impact on the health of the community, even at the closet residential receptor.	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.
19	Air quality	DPIE	Please respond to all issues raised in Todoroski Air Sciences Peer Review of Kariong Sand and Soil Supplies Air Quality Impact Assessment dated 22 September 2020.	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.
20	Air quality	NSW Health – Central Coast Local Health District	Please refer to their submissions. Aspects that need to be addressed include: Section 1 (air quality); Section 3; Section 5;	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.
21	Air quality	Worthington BMW, Worthington MINI, Worthington Motorcycles and Lexus Central Coast	Please refer to their submission. Recommend this be addressed	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.

No.	Issue	Agency	Comment	How addressed
22	Air quality	NSW EPA	Prior to project determination, the proponent should undertake a detailed feasibility assessment of engineering controls for controlling dust, including a benchmarking study against best practice dust management. The assessment must consider the adoption of fully enclosed structures around all key waste processing activities.	Additional controls are proposed: a) Northern end of crusher building to enclosed. b) Conveyor from crusher building to be enclosed to deposit aggregate into a three-sided concrete bunker with cover. c) Northern end of shredder building to enclosed. b) Conveyor from shredder building to be enclosed to deposit mulch into a three-sided concrete bunker with cover. Effectiveness of these controls to be assessed through ongoing air quality monitoring. For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.
23	Air quality	NSW EPA	The EPA advises that there is still noted uncertainty associated with the cumulative assessment presented in the revised AQIA (V2, 2020). The EPA recommends a more robust assessment of cumulative impacts from the nearby Gosford quarries be undertaken in a revised assessment.	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.
24	Air quality	NSW EPA	The EPA recommends the AQIA (V2, 2020) be revised to include robust justification for all levels of emission control adopted. Additionally, the emissions inventory must be reviewed to ensure the estimated controlled emission rates are accurate.	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.

No.	Issue	Agency	Comment	How addressed
25	Air quality	NSW EPA	Furthermore, the meteorological analysis undertaken has only considered 3 consecutive years of data (2014 to 2016), rather than the 5 years recommended in the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (2016). No justification for this shorter review period was provided. This further increases the uncertainty associated with the AQIA (V2, 2020). The EPA notes there is still uncertainty associated with the meteorological modelling undertaken in the AQIA (V2, 2020). However, the uncertainties could be adequately managed via a commitment to improved engineering controls including fully enclosed structures around processing areas.	For a detailed response to this comments, see the Air Quality Impact Assessment Addendum at Appendix 5.

No.	Issue	Agency	Comment	How addressed
26	Noise	NSW EPA	The EPA requires the proponent to demonstrate the following: • That the ambient monitoring location is representative of the ambient noise levels likely to be experienced at sensitive receivers located further to the east and at greater separation distances from the road and industrial noise sources; • Determine whether noise from existing operations at the Kariong Sand and Soil premises influenced the monitored ambient noise levels at the monitoring location; • The EPA notes that the sound power levels presented for the crushing and screening plant appear low compared to data supplied to EPA for similar items of plant and equipment on similar projects. The proponent needs to demonstrate that the sound power levels are achievable, and are based on the plant and equipment operating under normal load. Additionally, the NIA should present feasible and reasonable contingency measures that could be deployed should the major noise producing items of plant and equipment exceed levels considered in the assessment resulting in non-compliance with applied limits.	For a detailed response to this comments, see the Noise and Vibration Impact Assessment Addendum at Appendix 6.
27	Noise	DPIE	Please include predictions of PNLs at all receivers without mitigation measures in place in the Noise and Vibration Impact Assessment. Peer review by Muller Acoustics to be addressed	Section 6.1 of the second EIS states that without mitigation measures, the PNTLs are exceeded. For a detailed response to this comments, see the Noise and Vibration Impact Assessment Addendum at Appendix 6.

No.	Issue	Agency	Comment	How addressed
28	Traffic and access	DPIE	The Department notes traffic surveys were undertaken in 2017 and raises concerns about whether the survey results sufficiently represent the current traffic conditions as a result of recent proposed and completed development. As such, please provide a more recent survey result adequately representing the existing traffic in the site's vicinity and key intersections performance. Should a new traffic survey be undertaken, considering the COVID-19 pandemic, counts undertaken at the moment may not be representative. Alternative approaches to understanding the impact of COVID-19 pandemic on traffic patterns should be discussed with TfNSW.	For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
29	Traffic and access	DPIE	The Traffic Impact Assessment (TIA) states traffic surveys were undertaken at Central Coast Highway/Kangoo Road and Central Coast Highway/Wisemans Ferry Road intersections. Please provide traffic survey result of Central Coast Highway/Kangoo Road intersection for the completeness of the report.	Traffic to and from the facility are unlikely to use Kangoo Rd. For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
30	Traffic and access	DPIE	The TIA should assess the worst-case scenario when waste delivery vehicles from south using Central Coast Highway/Kangoo Road intersection and its impacts on the intersection performance.	Traffic to and from the facility are unlikely to use Kangoo Rd. For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
31	Traffic and access	DPIE	The TIA does not detail the proposed management measures for prohibiting waste delivery vehicles using Kangoo Road, Acacia Road and Debenham Road South to access the site. Please detail the management measures in the RtS.	Traffic to and from the facility are unlikely to use Kangoo Rd. For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
32	Traffic and access	DPIE	Please provide SIDRA modelling results for Wisemans Ferry Road/Gindurra Road intersection (the overall Level of Service (LoS) and LoS at AM and PM peaks in the TIA.	Additional SIDRA modelling has been conducted. For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.

No.	Issue	Agency	Comment	How addressed
33	Traffic and access	DPIE	The queueing analysis included in Section 3.2.4 of the TIA is insufficient considering it does not detail how long would it take for a truck to be processed at the weighbridge including weighing and visual inspection of waste load. Please clarify and provide additional queuing analysis in the RtS.	For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
34	Traffic and access	DPIE	Please respond to all issues raised in the peer review prepared by Intersect Traffic dated 22 September 2020.	For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
35	Traffic and access	Central Coast Council	+ On-street parking within Gindurra Road will no longer be available when the line marking associated with the channelised right turn bay into the development is implemented. + Concrete kerbing proposed to deny right turn movements out of the site should not obstruct the footway. + The plans for the development do not appear to set back the entry gates as per the recommendation of the TIA.	Gindurra Rd is currently highly unsuitable for on-street parking. There are currently no footpaths. The entrance gate has been set back 26m from Gindurra Rd. For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
36	Traffic and access	Transport for NSW	+ As noted in our previous submission, it is advised that the proposed right turn treatment on Gindurra Road at the site access be designed in accordance with the current versions of Austroads Guide to Road Design Part 4 and Part 4A.	Noted. Design has been updated and is in accordance with Austroads Guidelines.
37	Traffic and access	Peer review by Interesect Traffic	Please refer to peer review report. Please note that the proponent is prepared to have a driver education program put into place to prevent vehicles illegally turning into the site from east side of Gindurra Rd.	For a detailed response to this comments, see the Traffic Impact Assessment Technical Note at Appendix 7.
38	Fire	Fire & Rescue NSW	It is recommended that the an emergency plan for the waste facility in accordance with AS 3745–2010 Planning for emergencies in facilities be prepared for the development. An external consultant should be engaged to provide specialist advice and services in relation fire safety planning and developing an emergency plan.	An Emergency Plan has already been developed (see Appendix E of second EIS).

No.	Issue	Agency	Comment	How addressed
39	Fire	Fire & Rescue NSW	The fire safety study report should detail the layout of the proposed automatic sprinkler system for the site.	See updated Fire Safety Study at Appendix 9.
40	Fire	Fire & Rescue NSW	The fire safety study report should provide evidence of the hydraulic calculations for the sprinkler and hydrant systems.	See updated Fire Safety Study at Appendix 9 and hydraulics diagrams at Appendix 10.
41	Fire	Fire & Rescue NSW	A compliant fire hydrant system for the entire site including the following items; pressure, flow rates, layout, coverage, design, accessibility, connection points and isolation valves, as per AS 2419.1 – 2005 standard.	This is normally a requirement at the construction phase of the project. See hydraulics diagrams at Appendix 10.
42	Fire	Fire & Rescue NSW	It is recommended that the fire safety study report provide evidence (details) of existing fire protection equipment (currently in place) and proposed additional equipment/systems.	See updated Fire Safety Study at Appendix 9.
	Fire	Fire & Rescue NSW	The fire safety study report referenced the 2018 version of the FRNSW fire safety in waste facilities guideline document which has been updated and the February 2020 version is available. https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf	The Fires Safety Study has been updated to refer to the latest version of the guideline. See updated Fire Safety Study at Appendix 9.
43	Biodiversity	Central Coast Council	Refer to Central Coast Council submission for details	For a detailed response to this comments, see the Biodiversity Assessment Addendum at Appendix 8.
44	Biodiversity	DPIE Biodiversity Conservation Division	BCD recommends that a vegetation monitoring program be implemented to monitor the long-term survivorship of *Melaleuca biconvexa* on the site, to ensure the proposed mitigation measures are successful.	The proponent commits to preparing a vegetation monitoring plan, which includes ongoing vegetation monitoring. For a detailed response to this comments, see the Biodiversity Assessment Addendum at Appendix 8.
45	Other issues	DPIE	The Department notes Figure 3.5 of the WMP shows skip bin locations, but these locations are not shown on the civil plan. Please update the civil plan to ensure its consistency with the WMP.	The site layout plan shows fixed infrastructure, as is relevant to the development application. Skip bins are, by their nature, not fixed infrastructure. The likely location of residual waste skip bins has been included in the Waste Management Plan in response to a previous comment from DPIE. However, it should be noted that skip bin can be moved to suit the operational needs of the facility at any point in time.