Lord Howe Island Critical Infrastructure Project

Submissions Report

PREPARED FOR

NSW National Parks and Wildlife Service (part of the NSW Department of Climate Change, Energy, the Environment and Water) on behalf of the Lord Howe Island Board

DATE

04 March 2026

REFERENCE

0741543

DOCUMENT DETAILS

DOCUMENT TITLE	Lord Howe Island Critical Infrastructure Project
DOCUMENT SUBTITLE	Submissions Report
PROJECT NUMBER	0741543
DATE	04 March 2026
VERSION	Final
AUTHOR	Martin Kim
CLIENT NAME	NSW National Parks and Wildlife Service (part of the NSW Department of Climate Change, Energy, the Environment and Water) on behalf of the Lord Howe Island Board

DOCUMENT HISTORY

				ERM APPROVAL TO ISSUE		
VERSION	REVISION	AUTHOR	REVIEWED BY	NAME	DATE	COMMENTS
Draft	01	M. Kim	S. Bennett	M. Davey	17.02.2026	
Final Draft	02	M. Kim	S. Bennett	M. Davey	26.02.2026	
Final	03	M. Kim	S. Bennett	M. Davey	4.03.2026	

SIGNATURE PAGE

Lord Howe Island Critical Infrastructure Project

Submissions Report

0741543

Martin Kim
Senior Consultant

Simon Bennett
Principal Consultant

Tom Parry
Project Manager / Principal Consultant

Mark Davey
Partner

ERM Australia Pty Ltd
Level 14, 207 Kent Street
Sydney, NSW 2000

T +61 2 8584 8888

CONTENTS

LIST OF TABLES

LIST OF FIGURES

ACRONYMS AND ABBREVIATIONS

Acronym	Description
AIA	Aviation Impact Assessment
ANIA	Airborne Noise Impact Assessment
ANZECC	Australian and New Zealand Environment and Conservation Council
ARI	Annual Recurrence Interval
BDAR	Biodiversity Development Assessment Report
BOQ	Bill of Quantities
BRMP	Biosecurity Risk Management Plan
CASA	Civil Aviation Safety Authority
CCG	Community Consultation Group
CEMP	Construction Environmental Management Plan
CNS	Communications, Navigation, and Surveillance
CPHR	NSW DCCEEW - Conservation Programs, Heritage and Regulation Group
CSSI	Critical State Significant Infrastructure
DAFF	Australian Department of Agriculture, Fisheries and Forestry

Acronym	Description
DCCEEW (Cwth)	Commonwealth Department of Climate Change, Energy, the Environment and Water
DPHI	Department of Planning, Housing and Infrastructure
DPIRD	Department of Primary Industries and Regional Development
DPIRD-F	Department of Primary Industries and Regional Development – Fisheries
DPIRD-MP	Department of Primary Industries and Regional Development – Lord Howe Island Marine Park
EIS	Environmental Impact Statement
EPA	NSW Environment Protection Authority
EP&A Act	*Environmental Planning and Assessment Act 1979*
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999*
EPL	Environment Protection Licence
ERM	Environmental Resources Management Pty Ltd
GANSW	Government Architect NSW
ha	Hectare
HNSW	Heritage New South Wales
ICNG	*NSW Interim Construction Noise Guideline*
IPCC AR6	Intergovernmental Panel on Climate Change, Sixth Assessment Report
km	Kilometre
LHIB	Lord Howe Island Board
LHIMP	Lord Howe Island Marine Park
LHI CIP	Lord Howe Island Critical Infrastructure Program
LoLo	Load-on Load-off
MAA	Maritime Archaeological Assessment
MRF	Materials recovery facility
NPWS	NSW National Parks and Wildlife Service
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
OUV	Outstanding Universal Value
POEO Act	*Protection of the Environment Operations Act 1997*
PTS	Permanent threshold shift
RFI	Request for Information
RoRo	Roll-on Roll-off
SEARs	Secretary's Environmental Assessment Requirements

Acronym	Description
SDRP	State Design Review Panel
SOHI	Statement of Heritage Impact
SSI	State Significant Infrastructure
TfNSW	Transport for NSW
TTS	Temporary threshold shift
UDR	Urban Design Report
VIA	Visual Impact Assessment
WQO	Water Quality Objectives
WMF	Waste Management Facility
WWTP	Wastewater treatment plant

EXECUTIVE SUMMARY

BACKGROUND

The NSW National Parks and Wildlife Service (NPWS) (part of the NSW Department of Climate Change, Energy, the Environment and Water [NSW DCCEEW]) on behalf of the Lord Howe Island Board (LHIB) (the Proponent) proposes to construct, operate and maintain, new marine infrastructure, biosecurity infrastructure, and waste management facility (the Project) on Lord Howe Island. The Project Area comprises a North Zone and a South Zone, which have an area of 21.1 ha and 9.9 ha respectively.

The Project Environmental Impact Statement (EIS) was prepared by Environmental Resources Management Australia Pty Ltd (ERM) on behalf of the Proponent to assess the potential impacts of the Project on environmental and social values of Lord Howe Island. The EIS concluded that significant impacts were not expected, particularly with the implementation of appropriate management and mitigation measures. The Project is part of the broader Lord Howe Island Critical Infrastructure Program (LHI CIP) which includes a new freight vessel and mainland freight forwarding facility. These aspects are not included in the Project approval.

The Project EIS was placed on public exhibition from 15 October to 18 November 2025.

PUBLIC SUBMISSIONS AND ADVICE FROM AGENCIES

A total of 33 public submissions were received. Advice was received from ten Government agencies. **Table E-1** summarises the distribution of the public submissions and **Table E-2** summarises their contents.

TABLE E-1 NUMBER OF PUBLIC SUBMISSIONS

Type	Object	Support	Comment	Total
Public Submission	16	3	14	33

TABLE E-2 CATEGORIES OF ASPECTS RAISED IN SUBMISSIONS

Category	Description
The Project	The physical layout and design, design contingencies and resilience.
Procedural matters	The level or quality of engagement and assessments.
Economic, environmental and social impacts	Traffic and access, noise, visual amenity and built form, biodiversity, World Heritage values, social and economic, biosecurity, pollution and waste.
Justification and evaluation	Scale of infrastructure, alternatives considered.
Issues beyond the scope of the Project	Works outside the CSSI scope.

KEY OUTCOMES FROM SUBMISSIONS/ADVICE

Since the exhibition of the EIS, minor adjustments to building orientations and built form factors have been recommended to support the overall Project layout. The Project layout presented in the EIS assumed a worst-case disturbance footprint for the proposed infrastructure. No additional areas are proposed to be disturbed. Therefore, no material amendments have been made to the Project since EIS exhibition and, as such, an Amendment Report is not required.

Since exhibition of the EIS, the Proponent has continued to inform and engage with the Lord Howe Island community, NSW and Australian government agencies, and business and stakeholder groups. While submissions in objection to the Project outweighed those in support, information gathered through community engagement activities indicates a broad acceptance of the benefits of the Project. Notwithstanding, the views of those that objected to the Project have been considered.

The following additional assessments were undertaken to support this Submissions Report:

- Revised Statement of Heritage Impact; and
- Updated Urban Design Report.

The Project will not result in significant environmental, social or economic impacts, and the EIS, this Submissions Report and supporting assessments have concluded that any residual impacts can be appropriately managed and/or offset in accordance with relevant policies.

PROJECT JUSTIFICATION AND EVALUATION

The Project aims to deliver critical upgrades to Lord Howe Island's essential infrastructure and is consistent with the NSW Government's objectives for the LHI CIP. The Project replaces the ageing marine freight service with a new marine freight service and supporting infrastructure including a new modern vessel ramp and improved facilities for freight handling on the Island. These new facilities will reduce manual handling, improve safety and allow more consistent operational windows for the marine freight service. Biosecurity will be strengthened through the use of containerised freight handling which will minimise potential threats to the Island's World Heritage values. The Project also includes a compliant, fully-functioning waste management facility that will support daily operations and the tourism-based economy. Collectively, these infrastructure improvements seek to provide safer, more reliable, and environmentally responsible service delivery for the Island.

The Project, as exhibited in the EIS, has been sensitively designed to avoid and minimise social, economic and environmental impacts. Extensive public consultation has been undertaken during the master planning, design and development of the Project and this consultation will continue through the construction phase to ensure the community and stakeholders are informed of the Project's progress and how construction impacts are being managed.

Therefore, the Project is justified and will adequately address residual impacts through the implementation of safeguards and mitigation measures.

1. INTRODUCTION

1.1 BACKGROUND

The NSW National Parks and Wildlife Service (NPWS) (part of the NSW Department of Climate Change, Energy, the Environment and Water [NSW DCCEEW]) on behalf of the Lord Howe Island Board (LHIB) (the Proponent) proposes to construct, operate and maintain, new marine infrastructure, biosecurity infrastructure, and waste management facility (the Project) on Lord Howe Island.

The Proponent is seeking Critical State Significant Infrastructure (CSSI) consent for the Project under Division 5.2, Section 5.13 of the NSW *Environmental Planning & Assessment Act 1979* (EP&A Act). Environmental Resources Management Australia Pty Ltd (ERM) prepared an Environmental Impact Statement (EIS) for the Project (the Project EIS) (ERM, 2025) on behalf of the Proponent as part of the CSSI consent process (application ID: SSI-78107213).

The Project was determined to be a controlled action on 7 July 2025 under Part 9 of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) Referral (EPBC Ref: 2025/10188).

The Project EIS was publicly exhibited between 15 October and 18 November 2025 by the NSW Department of Planning, Housing and Infrastructure (DPHI). A total of 33 submissions were received from members of the public and advice from ten Government agencies during the exhibition period. The submissions are available on the DPHI Major Projects website Lord Howe Island Critical Infrastructure Project | Planning Portal - Department of Planning and Environment. No submissions were received from local council or special interest groups.

This Submissions Report has been prepared to respond to the matters raised in public submissions and Government agency advice and has been prepared in accordance with the *State Significant Infrastructure Guidelines – Preparing a Submissions Report*; Appendix C to the *State Significant Infrastructure Guidelines* (DPHI, 2024).

This Submissions Report provides details of actions which have been taken by the Proponent since the EIS was exhibited including ongoing community and Government stakeholder engagement activities. This Submissions Report should be read in conjunction with the Project EIS and supporting documentation; all available on the DPHI Major Projects website.

The Minister for Planning and Public Spaces is the consent authority for CSSI, and CSSI applications are assessed by DPHI. Following receipt of this Submission Report, DPHI will complete its assessment of the Project, prepare an assessment report and make a recommendation, taking into consideration the EIS, Submissions Report and supporting documentation as well as submissions made during the public exhibition period.

1.2 PROJECT OVERVIEW

The Project is on Lord Howe Island, which is a 1,455 hectare (ha) island located about 770 kilometres (km) to the northeast of Sydney, NSW, and about 570 km east of Port Macquarie, NSW. Port Macquarie is the nearest mainland port to Lord Howe Island and is the base for the current marine freight service. Lord Howe Island is part of the state of NSW and is regarded legally as an unincorporated area administered by the LHIB.

The location of the Project in the regional context is shown in **Figure 1-1**.

Admiralty Islands

North Zone

South Zone

Lord Howe Island

Ball's Pyramid

Legend

- Project Area
- Marine Park Area
- World Heritage Area

Coordinate System:
GDA 1994 MGA Zone 57

Date: 26/02/2026

Created By: MB/IS

Drawing Size: A3

0 2.5 5Km

1:140,000

F1-1 Project Locality

LHI CIP
Submissions Report

Client: DCCEEW (NSW) on behalf of LHIB

ERM

0708120_LordHowe_LHI_CIP_SR_R0.aprx

The Project is part of the broader Lord Howe Island Critical Infrastructure Program (LHI CIP). The aspects assessed in the EIS comprised the construction, operation and maintenance of the following components:

Freight handling facility (North Zone):

- Construction of new and upgraded marine infrastructure (e.g., new piled vessel ramp and landing facilities) and cargo interface areas for freight service operations;
- Hardstand areas to facilitate safe movement of cargo from the vessel to the Island via the freight handling facilities;
- Construction of a bunded boat maintenance area;
- Construction of biosecurity quarantine facilities;
- Adaptive reuse of the existing Ocean View and Old Cargo Shed buildings;
- Upgraded boat ramp and boat parking for recreational vessels; and
- Construction of new public amenities, such as a new informal viewing area.

Waste management facility (South Zone):

- Reconfiguration of the organics processing infrastructure and provision of a dedicated facility for organics processing;
- Construction of a waste receival area/shed to facilitate community waste disposal;
- Construction of facilities/areas to adequately store liquid and hazardous wastes;
- Construction of a new Materials Recovery Facility (MRF) and new working platform to provide secure, safe operating conditions;
- Perimeter fencing, security and restricted access upgrades; and
- Construction of a new wastewater treatment plant (WWTP).

Dog kennels and fuel bowser (South Zone):

- Construction of a dedicated kennel for housing the detection dogs near the airport; and
- Construction of a self-serve fuel bowser with two fuel pumps on Old Lagoon Road near the vehicle entry to airport and WMF. The fuel storage will be above ground and bunded.

The Project layout is shown in **Figure 1-2** (North Zone) and **Figure 1-3** (South Zone).

No	Design Elements (Indicative)
1	PUBLIC BOAT RAMP
2	UPGRADED WILSONS LANDING PICNIC AREA
3	CONTAINER STUFFING/UNSTUFFING
4	CARGO LOADING/UNLOADING AREA AND STORAGE
5	BOAT PARKING FOR TFNSW/MARINE PARKS
6	OCEAN VIEW BOATSHED ADAPTIVE REUSE
7	MARINE RESCUE SHED RETAINED
8	OLD CARGO SHED ADAPTIVE REUSE
9	INFORMAL VIEWING AREA WITH SEATING
10	UPGRADED MARINE INFRASTRUCTURE
11	EXISTING CAR AND/OR TRAILER PARKING RETAINED
12	BIOSECURITY/QUARANTINE SHED
13	AUSTRALIA POST AND STORAGE ROOMS
14	JETTY

INSET SCALE: 1:20,000

Lagoon Road

Legend

- Cadastre
- Temporarily Secured Area During Vessel Loading/Unloading
- Project Area
- Disturbance Area
- Marine Parks & TFNSW
- New Vessel
- Proposed Piled Vessel Ramp
- Proposed Hardstand
- Proposed Berthing Dolphin
- Proposed Timber Deck
- Proposed Tree
- Proposed Turf Area
- Item to be removed

Source:
Boundary: Client Provided
Imagery: NSW Spatial Services

Coordinate System:
GDA 1994 MGA Zone 57
Date: 26/02/2026
Created By: MB/IS
Drawing Size: A3
0 20 40m
1:1,500

F1-2 Project Layout (North Zone)

LHI CIP
Submissions Report
Client: DCCEEW (NSW) on behalf of LHIB

ERM

0708120_LordHowe_LHI_CIP_SR_R0.aprx

No	Design Elements (Indicative)
1	STORAGE SHED
2	OPEN BUNKERS
3	BULKY GOODS STORAGE
4	ORGANICS STORAGE
5	WASTEWATER TREATMENT PLANT
6	ORGANICS PROCESSING WORKSHOP
7	MATERIALS RECOVERY FACILITY (MRF)
8	OFFICE/AMENITIES BUILDING
9	COMMERCIAL WASTE RECEIVAL
10	RESIDENTIAL WASTE RECEIVAL
11	PROPOSED FUEL SERVICING AREA
12	PROPOSED DETECTION DOG KENNELS
13	CONSTRUCTION LAYDOWN

INSET SCALE: 1:20,000

28

Legend

- Existing Walking Track
- Cadastre
- Disturbance Area
- Project Area
- Proposed New/Upgraded Road
- Proposed Tree
- Proposed Turf Area
- Proposed Hardstand

Source:
Boundary: Client Provided
Imagery: NSW Spatial Services

Coordinate System:
GDA 1994 MGA Zone 57
Date: 26/02/2026
Created By: MB/IS
Drawing Size: A3

0 50 100m

1:3,000

F1-3 Project Layout (South Zone)

LHI CIP
Submissions Report
Client: DCCEEW (NSW) on behalf of LHIB

ERM

0708120_LordHowe_LHI_CIP_SR_R0.aprx

2. ANALYSIS OF SUBMISSIONS

2.1 NUMBER OF SUBMISSIONS

A total of 33 public submissions and advice from 10 government agencies were received during the exhibition period.

Two responses were received from the NSW DPHI Crown Lands. These have been consolidated as one agency advice.

2.1.1 PUBLIC SUBMISSIONS

Of the 33 submissions that were received from the public, a total of three (9%) were classified as being in support of the Project, 16 (48%) were classified as being in objection to the Project, and 14 (42%) provided comment only (refer **Figure 2-1**). All submissions received were recorded in a Submissions Register (**Appendix A**).

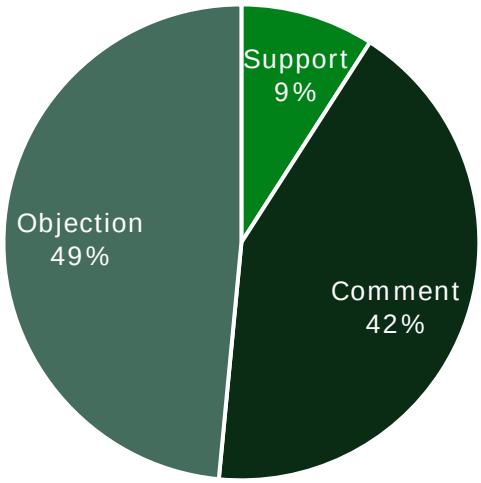

FIGURE 2-1 PUBLIC SUBMISSION CATEGORISATION

2.1.2 AGENCY ADVICE

The ten Government agencies and authorities that provided advice on the EIS were:

- NSW DCCEEW Conservation Programs, Heritage and Regulation Group (CPHR);
- NSW DCCEEW Heritage NSW (HNSW);
- NSW DCCEEW Water Group;
- NSW Department of Primary Industries and Regional Development (DPIRD) Fisheries;
- DPIRD Agriculture & Biosecurity;
- NSW Environment Protection Authority (EPA);
- Transport for NSW Maritime (TfNSW Maritime);
- DPIRD Lord Howe Island Marine Park (DPIRD-MP);
- NSW Crown Lands; and
- Australian Government Civil Aviation Safety Authority (CASA).

Section 4 provides detailed responses to the advice provided by these government agencies and authorities. Separately, DPHI issued a request for information (RFI) which consolidated queries about several aspects of the Project including visual impacts, tourism and employment, and public access. Responses to this RFI are provided in **Table 4-9**.

2.1.3 FEEDBACK

Seven submissions were received after the EIS exhibition period had closed. These do not contribute to the totals above; however, they are regarded as feedback submissions and responses to these issues raised have been considered. Five of these feedback submissions were lodged by different senders but included the same content, verbatim, as one lodged during the exhibition period (SE-98630228) and have, therefore, been treated as part of that formal submission. The remaining feedback submissions raised issues commensurate with those raised in the formal submissions as categorised in **Section 2.3**. Therefore, responses to all feedback submissions have been incorporated in **Section 5** of this Submissions Report.

2.2 GEOGRAPHIC ANALYSIS

The *State Significant Infrastructure Guidelines – Preparing a Submissions Report, Appendix C to the State Significant Infrastructure Guidelines* (DPHI, 2024), specify that submissions should be categorised geographically with respect to the Project Area. Specifically, according to the level of interest from local (<5 km from the site), regional (5-100 km from the site) and the broader community (>100 km from the site).

Of the 33 public submissions received:

- 30 (91%) were local (one in support, 16 in objection and 13 comments); and
- Three (9%) were from the broader community, which in the context of Lord Howe Island represents submissions from mainland Australia (two in support and one comment).

Figure 2-2 shows the geographic distribution of all public submissions. All objections to the Project were local.

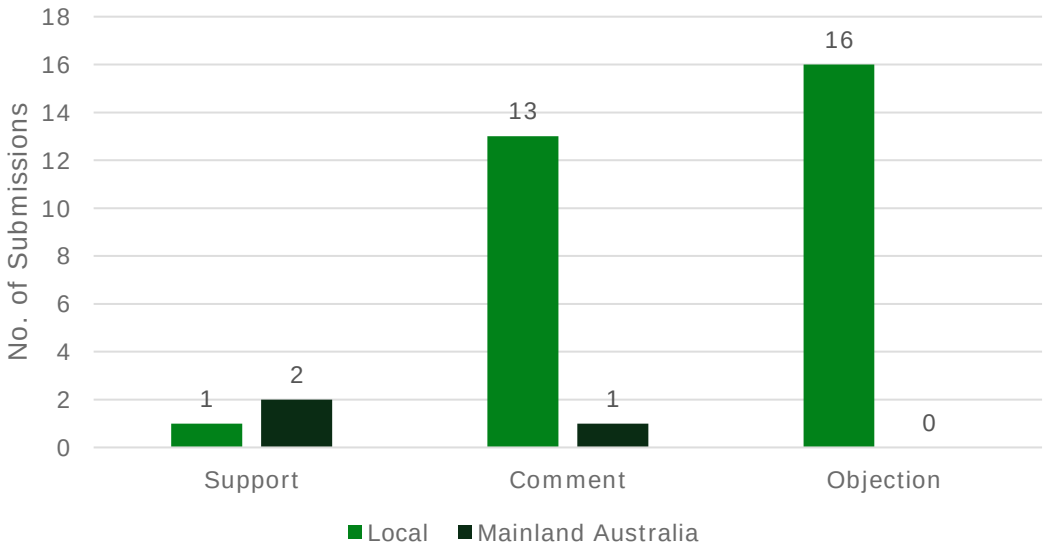

FIGURE 2-2 GEOGRAPHIC ANALYSIS OF SUBMISSIONS

2.3 SUBMISSIONS CATEGORISATION

Each public submission received was reviewed and the key themes categorised according to the *State Significant Infrastructure Guidelines – Preparing a Submissions Report, Appendix C to the State Significant Infrastructure Guidelines* (DPHI, 2024), as summarised below in **Table 2-1**. Note that each submission provided in support or objection to the Project may have raised more than one key theme.

TABLE 2-1 CATEGORIES OF ASPECTS RAISED IN SUBMISSIONS

Category	Description
The Project	The physical layout and design, design contingencies, and resilience.
Procedural matters	The level or quality of engagement and assessments.
Economic, environmental and social impacts	Traffic and access, noise, visual amenity and built form, biodiversity, World Heritage values, social and economic, biosecurity, pollution and waste.
Justification and evaluation	Scale of infrastructure, alternatives considered.
Issues beyond the scope of the Project	Works outside the CSSI scope.

Once submissions were allocated according to the categories in **Table 2-1**, they were further categorised into relevant sub-themes – e.g., biodiversity, noise, pollution.

A breakdown of the key matters raised in submissions in support of, those in objection to, and those that provided comments only on the Project is provided below.

2.3.1 COMMUNITY SUPPORT

The major themes raised in the three (9%) public submissions in support of the Project are provided in **Table 2-2** and **Figure 2-3** shows how these were distributed.

TABLE 2-2 KEY MATTERS RAISED IN PUBLIC SUBMISSIONS (SUPPORT)

Category	Description
Procedural matters	Community-led engagement was positive and considerate.
Economic, environmental and social impacts	Biosecurity improvements will lead to long-term preservation of World Heritage values.
Justification and evaluation	The scale of infrastructure is appropriate for the community's current and future needs.

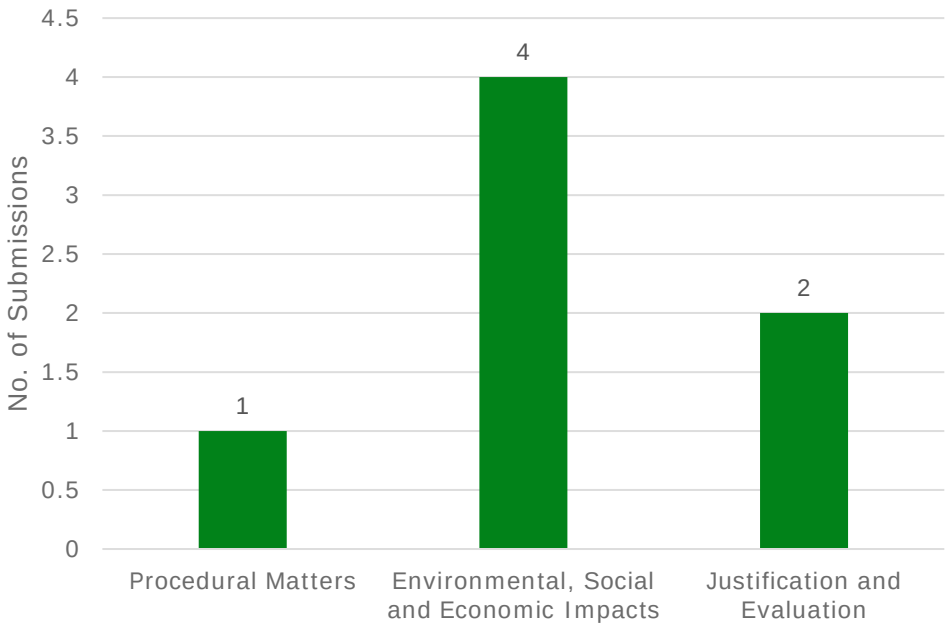

FIGURE 2-3 BROAD THEMES OF SUPPORT SUBMISSIONS

2.3.2 COMMUNITY OBJECTIONS

The major themes raised in the 16 (48%) public submissions that objected to the Project are provided in **Table 2-3** and **Figure 2-4** shows how these were distributed.

TABLE 2-3 KEY MATTERS RAISED IN PUBLIC SUBMISSIONS (OBJECTION)

Category	Description
The Project	The layout is inappropriate, no contingencies in the proposed design.
Procedural matters	Insufficient community engagement and impact assessments.
Economic, environmental and social impacts	Access constraints, safety concerns, incompatibility with World Heritage values and island character, native biodiversity and seabed impacts, reduction in tourism, cost burdens to the community.
Justification and evaluation	The scale of infrastructure is not required for community needs, roll-on roll-off (RoRo) logistics are overly complex compared to the existing load-on load-off (LoLo) method.
Beyond Project scope	Details regarding the mainland port and vessel design specifics, degraded nature of the existing roads.

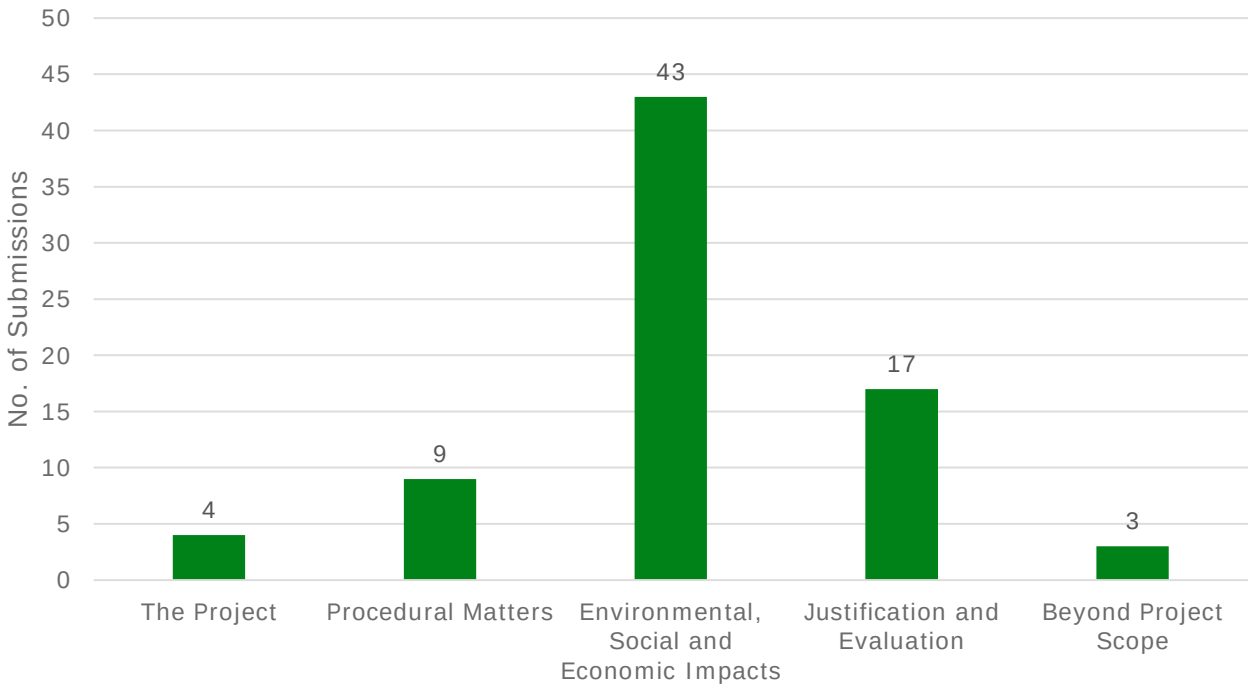

FIGURE 2-4 BROAD THEMES OF OBJECTING SUBMISSIONS

2.3.3 COMMUNITY COMMENTS

The major themes raised in the 14 (42%) public submissions that commented on the Project are provided in **Table 2-4** and **Figure 2-5** shows how these were distributed.

TABLE 2-4 KEY MATTERS RAISED IN PUBLIC SUBMISSIONS (COMMENT)

Category	Description
The Project	The layout requires revision and design contingencies suggested.
Procedural matters	Concerns that the Community Consultation Group was unheard and ongoing consultation strategies suggested.
Economic, environmental and social impacts	Suggestions regarding the final built form, account for access constraints, requests for additional environmental impact assessments and tender process transparency.
Justification and evaluation	RoRo logistics are overly complex compared to the existing load-on load-off (LoLo) method.
Issues beyond the scope of the Project	Details regarding the mainland port and vessel design specifics, degraded nature of the existing roads.

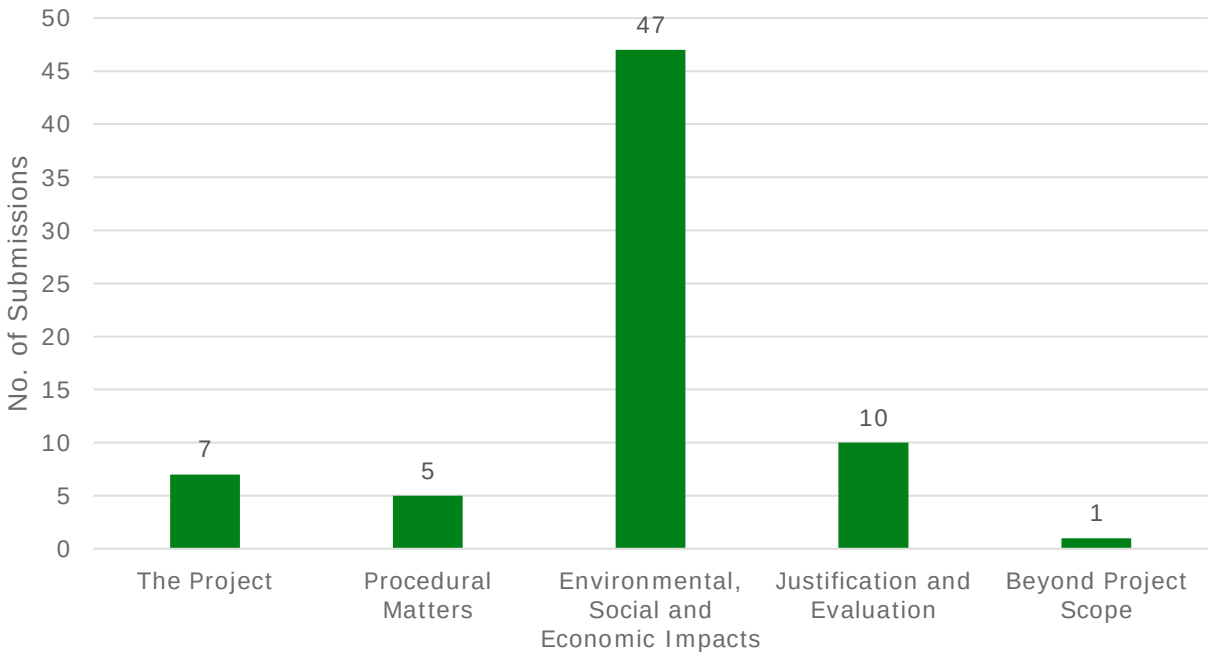

FIGURE 2-5 BROAD THEMES OF COMMENT SUBMISSIONS

3. ACTIONS TAKEN SINCE EXHIBITION

3.1 AGENCY ENGAGEMENT

The proponent has continued to engage with government agencies and authorities since the EIS was exhibited. Engagement has focused largely on clarifying the issues raised in submissions. Although no government agency objected to the Project, several have sought additional information or have recommended specific conditioning if approval is granted.

Table 3-1 summarises engagement undertaken with government agencies since the exhibition of the EIS.

TABLE 3-1 REGULATOR ENGAGEMENT OVERVIEW

Engagement Activity	Description
Heritage NSW	
4 February 2026	• Discussed options to minimise impacts on the heritage listed items, particularly submissions by HNSW regarding the: ◦ Proposed vehicle crash barrier (e.g., fence and bollards) adjacent to the former Cargo Shed ◦ The requirements and timing of a condition assessment to assess whether remedial work will be required for the roof trusses of Ocean View Shed.
Lord Howe Island Marine Park NSW	
20 January 2026	• Consultation on adaptive re-use of Ocean View Shed, North Zone as storage facility, providing an update on the tender process being managed by NSW Public Works.
11 February 2026	• Discussed the DPIRD-MP submission, specifically their concerns relating to the vessel design, cargo handling, and installation of mooring dolphins.
DPHI	
24 November 2025	• Discussed the submissions received, upcoming meeting with DCCEEW (Cwth) and proposed delivery dates for the submissions report
8 December 2025	• Discussed the submissions received, major issues that were raised, and a summary of DPHI and DCCEEW (Cwth) separate meeting regarding the CPHR submission.
3 February 2026	• Discussed the submissions received, major issues that were raised, which agencies the Proponent intended to engage with, the progress and intended dates for submission of the Submissions Report to DPHI.
DCCEEW (Cwth)	
8 December 2025	• *As per DPHI meeting*
Government Stakeholder Consultation Group	
11 November 2025	• Bi-monthly meeting was held during the extended public exhibition phase; agencies included LHIB, NSW Public Works, TfNSW (Maritime), EPA, DPHI, Heritage NSW, DPIRD. DCCEEW presentation on Program and Projects Status, EIS Public Exhibition, Procurement and New Marine Vessel & Operations.
Transport for NSW (Maritime NSW)	
20 January 2026	• Consultation on adaptive re-use of Ocean View Shed, North Zone as storage facility, providing an update on the tender process being managed by NSW Public Works.

3.2 COMMUNITY AND STAKEHOLDER ENGAGEMENT

Since exhibition of the EIS, the Proponent has continued to inform and engage with and seek feedback from the community and other stakeholders as detailed in **Table 3-2**.

TABLE 3-2 COMMUNITY AND STAKEHOLDER ENGAGEMENT OVERVIEW

Engagement Activity	Description
Community Consultation Group and EIS Public Exhibition on LHI	
06 November 2025	• Community Consultation Group meeting with representatives of residents on Lord Howe Island in a presentation from DPHI, Transport, Water & Infrastructure Assessments team attended to inform community on the process on how to make a public submission in the NSW Planning Portal. • Community Drop-In Session with EIS reports and plans displayed in the Community Hall on Lord Howe Island. DPHI and LHIB were in attendance to explain the EIS and assist residents on how to prepare a public submission.
Community and Lord Howe Island Board Meeting Open Session	
11 February 2026	• DCCEEW provided an update to the progress of works for all LHI Critical Infrastructure Program works, including the works subject to this SSI application and the New Marine Vessel. LHI CIP Status Business Paper is available on the LHIB website under agenda number 11.01 - ED26 243.01. ED26 243.01 Website Content - Board Meeting - Agenda and Open Business Papers - February 2026(3)_Redacted.pdf
18 February 2026	• DCCEEW provided a community update (Householder) on LHI Critical Infrastructure Program status on Responses to Submissions to EIS, Marine Vessel and Operations, Main Infrastructure Works and Next Steps – available on website - Householder – Critical Infrastructure Program – February 2026 Update | Lord Howe Island Board

3.3 PROJECT AMENDMENTS

Since EIS exhibition, minor adjustments to building orientations and built form factors have been recommended to support the overall Project layout. The Project layout presented in the EIS presented the worst-case disturbance footprint of the proposed infrastructure where no additional areas are proposed to be disturbed. Therefore, no material amendments have been made to the Project since EIS exhibition and, as such, an Amendment Report is not required.

3.4 FURTHER ASSESSMENT OF THE PROJECT

Technical assessments have been updated to address the matters raised in submissions. These assessments are summarised in Table 3-3. These assessments are referred to as 'updated' or 'revised'. **Appendix B** comprises the complete list of mitigation measures for the Project.

TABLE 3-3 OVERVIEW OF ADDITIONAL ASSESSMENTS

Assessment	Author	Overview	Reference
Revised Statement of Heritage Impact (SOHI)	ERM	The revised SOHI includes updated assessments regarding heritage significance and potential impacts in response to submissions. Key additions to the revised SOHI include additional historical context, archaeological assessments and built form recommendations to safeguard the existing character of the North Zone as well as measures to retain any unexpected finds. No overall change in potential heritage impacts is expected upon the implementation of the proposed measures.	**Appendix C**
Updated Urban Design Report (UDR)	Lahznimmo Architects Pty Ltd and Spackman Mossop Michaels Pty Ltd (LA/SMM)	The updated UDR includes an updated Visual Impact Assessment in response to submissions as well as direct responses to advice from the NSW State Design Review Panel (SDRP). Key additions to the updated UDR are photomontages that model views of the proposed infrastructure from key viewpoints, including an additional viewpoint along Lagoon Road. The potential visual impact of mooring dolphins was also assessed with mitigation measures proposed. No overall change in potential visual impacts is expected upon the implementation of the proposed measures.	**Appendix D**

4. RESPONSE TO GOVERNMENT AGENCY ADVICE

Government agencies and authorities have either provided advice seeking additional information or clarification, recommended specific conditions of consent to meet their requirements, or confirmed they have no further comments or concerns. A response to each of the matters raised in advice provided by Government agencies and authorities is provided in **Table 4-1** to **Table 4-8**. A response to the RFI issued by DPHI is provided in **Table 4-9**.

The advice provided by the DPIRD Agriculture and Biosecurity and NSW Crown Lands consisted of an acknowledgement of the EIS assessment; however, no further comments/recommendations were provided. These submissions are not included in this section.

Copies of all agency advice are available on the Major Projects portal: Lord Howe Island Critical Infrastructure Project | Planning Portal - Department of Planning and Environment.

TABLE 4-1 ADVICE PROVIDED BY CPHR

Ref No.	Theme	Submission	Response	Where Addressed
CPHR_01	Coastal hazards	More clearly reference the apparent use of the Lord Howe Island Coastline Hazard Definition and Coastal Management Study, providing increased detail on, and consideration of: • Coastal processes • Coastal hazards and associated risk to the South Zone and North Zone, including under projected climate change induced sea level rise impacts using contemporary sea level rise estimates from IPCC AR6. Noting the adopted design 1% short-term storm demand volume for South Zone of ~50m^3/m, the projected coastal recession rate, and coastal inundation levels and risks may be higher under higher sea level rise scenarios; and should be at least described and acknowledged as part of the coastal hazard assessment.	Coastal hazards and associated risk to both the North Zone and the South Zone were assessed in the Protected and Sensitive Lands Assessment. Section 3.2 of this assessment describes the climate change parameters adopted for the assessment, which included use of the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6). Specifically, both low-emissions and high-emissions pathways were considered in the assessment. Section 3.3.7.2 of the Protected and Sensitive Lands Assessment acknowledges that under a conservative sea level rise scenario (i.e., assuming that the reef crest does not accrete as sea level rises) erosion demand is expected to rise by 10m^3/m to 30 m^3/m under 100-year ARI storm demand. An erosion hazard parameter of 50 – 80 m^3/m was adopted for the South Zone. The Protected and Sensitive Lands Assessment considered the location of development within the South Zone, which is at least 38 m from the shoreline. While the assessment states that infrastructure may, post-2100, fall within the Zone of Reduced Foundation Capacity, direct erosion of the site is unlikely. Notwithstanding, appropriate foundation design measures have been recommended and will be included in the detailed design.	Section 3.2 and Section 3.3.7.2 of Appendix U of the EIS
CPHR_02	South Zone sea level rise	In addition to proposed coastal hazard risk reduction controls, require that development in the South Zone is set-back as far landward as is practicably possible. Elevation and foundational stability are also key issues to mitigate risk from coastal inundation, and erosion impacts. Site layout is key to avoiding the impacts of coastal hazards for as long as possible. We note that sea level rise is not expected to cease in 100 year's time, and impacts to the facility in the South Zone are expected over the longer-term under climate change induced sea level rise. Over the medium to longer-term, a strategy of protection, relocation, or accommodation will likely be required to manage the risks and impacts of coastal hazards at the sites.	Noted. Development in the South Zone will avoid and minimise clearing of vegetation, particularly in the fore-dune area, by using existing disturbed/cleared areas. The design of the South Zone infrastructure has considered proximity to the shoreline and has maximised the setback; however, this will be revisited during detail design and, if possible, greater setback distances may be adopted. Coastal buffers will also be maintained. LHIB is responsible for coastal protection and will adopt an adaptation pathway with pre-defined triggers (e.g., erosion/inundation thresholds) for accommodation, relocation, or decommissioning before residual risk becomes unacceptable.	This table
CPHR_03	Coastal management strategy	Require the preparation of a coastal management strategy that considers the coastal processes and coastal hazard risks (under a 100-year climate change scenario considering a broad range of projected sea level rise scenarios), and which describes a coastal hazard management strategy to manage those risks into the future. The coastal management strategy might consider key triggers and thresholds, and describe a feasible, yet comprehensive monitoring strategy to inform management response into the future. The strategy would integrate the Coastal Zone Emergency Action Subplan proposed under EIS Table 6.5.3.	Noted. The Proponent commits to development of a Coastal Management Strategy.	This table

Ref No.	Theme	Submission	Response	Where Addressed
CPHR_04	Rodent biosecurity	The BDAR and EIS be revised to include detailed descriptions of specific biosecurity measures proposed to be applied to each component of the project during both construction and operational phases to manage biosecurity threats and prevent incursions by introduced rodents.	The EIS included a Biosecurity Risk Management Framework (Appendix O) to manage all biosecurity risk. This will be finalised prior to the commencement of construction and, in consultation with relevant stakeholders, i.e., LHIB, Department of Agriculture, Fisheries and Forestry and the Department of Primary Industries and Regional Development (DPIRD). It should be noted that DPIRD reviewed the EIS and Appendix O and had no further comments on the requirements of the Biosecurity Risk Management Framework. Specific biosecurity mitigation will need to be informed by the Principal Contractors proposed approach, machinery, equipment, etc.	This table

TABLE 4-2 ADVICE PROVIDED BY HNSW

Ref No.	Theme	Submission	Response	Where Addressed
HNSW_01	Ocean View Boatshed condition assessment	Further to SoHI Recommendation 2, we recommend that a condition assessment be undertaken for the timber roof trusses in the Ocean View Boatshed. The inspection should be undertaken by a heritage architect and/or engineer who should advise on any remedial or repair works that may be required to the trusses, and these works should be implemented as part of the SSI works.	A condition assessment will be undertaken by a heritage architect and/or engineer, with advice provided on any remedial or repair work that may be required for the trusses, with any recommended works to be implemented as part of the SSI works. Section 7.2.2 of the Revised SOHI (**Appendix C**) includes observations of these trusses that may be subject to rot and structural damage. Proposed removal or work that may impact truss elements must be discussed in advance with the Project Heritage Consultant.	Section 7.2.2 of **Appendix C**
HNSW_02	Cargo Shed barrier	Further to SoHI Recommendation 4, we recommend that other forms of barrier be considered to protect the Cargo Shed from vehicular damage. These could include bollards — metal, timber or stone — which would allow for greater visual permeability around the building than a contiguous barrier and improve its immediate setting. However, it is essential that any type of barrier should effectively protect the building from vehicular damage.	Consideration will be given to the extent and type of the proposed vehicle crash barrier around the Old Cargo Shed, such as bollards, and if possible be reduced to minimise its visual and physical dominance within the historic Wilson's Landing precinct. Section 7.2.4 of the SOHI (**Appendix C**) includes recommendations for a more restrained approach given the infrequent use of the area by freight vehicles (once a fortnight) along with operational safety requirements for vehicles, workers and pedestrians.	Section 7.2.4 of **Appendix C**
HNSW_03	Cargo Shed colour scheme	The paint colour scheme proposed for the exterior of the Cargo Shed and Ocean View Boatshed is suitable but should include darker toned paint for timber battening and window frames to contrast with lighter tones used on the wall sheeting/cladding. This would reflect the paint tones that can be seen in historic photographs.	"Resene Atomic" is a darker toned paint colour of grey-blue shade (Hex #3D4B52) proposed for the timber battening and window frame colour scheme for the Old Cargo Shed and Ocean View Boatshed. The Proponent will consult with the Project Heritage Consultant when finalising the colour scheme during detailed design.	This table
HNSW_04	Archaeological potential	Heritage NSW considers that the SoHI does not adequately justify its conclusion that the project area has low to negligible archaeological potential. We note that: • The assessment lacks sufficient detail regarding the specific extent of ground modification and disturbance across the project area, beyond the potentially localised impacts from jetty construction and foreshore works. Heritage NSW advises that, unless explicitly demonstrated otherwise, archaeological potential may still exist beneath and between disturbed zones. • Table 6.2 in the MAA indicates the presence of "above-ground archaeological remains" associated with the former jetty. • Figure 4.2 incorrectly marks the location of the North Zone project area. This location is more correctly indicated in Figure 3.3 of the MAA as situated near a known historic settlement at Settlement Beach. • The areas of archaeological potential indicated in Owens 2008 do not represent an exhaustive summary of the archaeological sensitivity of the island. The island as a whole retains potential for unmapped archaeological features and potential relics associated with the earliest phases on occupation. • Figure 4.36 in Owens 2008 indicates the potential for archaeological features and relics associated with mapped permissive occupancies and land use near the North Zone project area.	The Revised SOHI (**Appendix C**) includes additional information to support the assessment of archaeological potential. Responses to these notes are included in HNSW_05 below.	This table

Ref No.	Theme	Submission	Response	Where Addressed
HNSW_05	Detailed archaeological assessment	In consideration of the above points, please update the SoHI to include a detailed archaeological assessment. The assessment should include: a. Further specific detail of historic ground disturbance works to determine if areas of localised intact soils may remain b. An assessment of archaeological potential of the project area as relates to specific historic phases of occupation, including the archaeological potential of the former jetty c. An assessment of archaeological significance of potential archaeological resources, including the archaeological potential of the former jetty d. A map of archaeological sensitivity of the project area e. An updated impact assessment in consideration of any revised archaeological sensitivity f. Updated mitigation measures (if required)	The Revised SOHI (**Appendix C**) has been updated to include additional assessment details as follows: a. Section 4.2.2 includes additional information about the early development of Wilson's Landing and the Cargo Shed Group. b. Section 4.2.3 includes additional commentary about the early development in the South Zone. c. Section 5.4 includes assessments of potential archaeology with consideration of the additional information above, including specific historic phases and the former jetty. The Project Area as a whole is considered to be of low to negligible historic archaeological sensitivity owing to extensive site disturbance, including clearing and cut and fill activities. Discrete areas of high (former jetty location) and moderate (north of picnic area – potential rubbish dump) archaeological sensitivity are located within the North Zone and will be managed through appropriate mitigation measures. The South Zone is considered to have nil-to-low archaeological potential. d. Section 5.4.3 includes assessment of potential archaeological resources including that of the former jetty. Aside from the remains of the former jetty, any extant archaeological resources in the Project Area would be unlikely to have archaeological research potential and would have little to no archaeological heritage value. e. Figure 5-1 presents a map of archaeological sensitivity across the North Zone. The South Zone is not included due to the additional information above. f. Section 6.1 includes an updated impact assessment which considers the additional information as above, as well as accounting for the responses provided in HNSW_01, HNSW_02 and HNSW_03. g. Section 7.2 includes updated mitigation measures that consider the responses given to the advice in this table. Refer to HNSW_01, HNSW_02 and HNSW_03.	**Appendix C**
HNSW_06	Former jetty integration	Please provide further detail regarding the integration and interpretation of the archaeological remains of the former jetty as part of the proposed design. Please provide further detail as to how potential impact to these remains will be mitigated.	Remains of the former jetty will be left in-situ. Photographs of the archaeological remains may be incorporated into heritage interpretative displays proposed to be displayed in the Old Cargo Shed building. Section 6.2.1 of the updated UDR (**Appendix D**) has been updated to include a paragraph about the Old Jetty elements being retained and interpreted.	Section 6.2.1 of **Appendix D**
HNSW_07	World and National Heritage	In regard to potential heritage impacts, Heritage NSW note that: • SoHI Appendix A includes a World Heritage and National Heritage impact assessment. It assesses that the SSI would not result in the identified World Heritage (Outstanding Universal Values) or National Heritage values of the Lord Howe Island Group being "lost, degraded or damaged, or notably modified, obscured or diminished". • SoHI Appendix A further considers that improvements to biosecurity and environmental management resulting from the SSI would ultimately be beneficial to conservation of the heritage values of the place. Heritage NSW agrees with the SoHI assessment that the SSI would not have a significant impact on the aesthetic values of the Lord Howe Island Group due to the locations, the low scale form and relatively small footprint of the proposed development. Proposed building colours and soft landscaping, including screen planting to development perimeters, would also help soften visual impacts.	Noted.	This table

TABLE 4-3 ADVICE PROVIDED BY NSW DCCEEW WATER GROUP (WATER)

Ref No.	Theme	Submission	Response	Where Addressed
Water_01	Water demands	That Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to: • Quantify the maximum annual project water demands for the construction and operation phases. • Identify feasible water supply sources to meet the estimated water demands.	The water demand for the Project cannot be quantified until the 50% design is completed and a bill of quantities (BOQ) is prepared. An estimated maximum water demand for the Project can be determined by the Principal Contractor when they are engaged. The Principal Contractor will be responsible for sourcing water required for construction. There is no intent to use groundwater. Water supply options include: • Rainwater – tanks will be included on appropriate construction infrastructure (e.g., site offices) to capture as much rainwater as possible for use during construction • Purchased water carted to site.	This table

TABLE 4-4 ADVICE PROVIDED BY DPIRD FISHERIES (DPIRD-F)

Ref No.	Theme	Submission	Response	Where Addressed
DPIRD-F_01	Refer to DPIRD-MP	DPIRD Fisheries maintains a priority interest in this project given its location within the Lord Howe Island Marine Park. The Lord Howe Island Marine Park team will lead the review of the EIS and provide comments for this and any future stages of the proposal. Consequently, the Aquatic Ecosystems Assessment Unit does not require further direct consultation on this matter.	Noted.	This table

TABLE 4-5 ADVICE PROVIDED BY EPA

Ref No.	Theme	Submission	Response	Where Addressed
EPA_01	Operational waste management	The EPA recommends that the proponent provide an updated Waste Impact Assessment that clearly articulates how each new piece of key infrastructure will contribute to processing and managing each of the waste streams under the proposed operational arrangement of the WMF once commissioned and into the future. The EIS and Appendix Z do not provide sufficient detail on how the various operational waste streams will be managed. Appendix Z Section 6.2 states that "It is anticipated there would be negligible waste generated during the operational phase of the project". Whilst the new WMF in itself would not generate significant waste, it will receive, process, store and manage a variety of waste types from island activities for shipment to the mainland. For example, one of the biggest challenges at the current WMF are organics and liquid waste management, yet there are no clear strategies identified for the management of either type of waste. It is noted in the EIS and various appendices that the volume of waste received and handled by the existing WMF is relatively small when compared to other similar mainland waste management facilities. Regardless of scale, the existing WMF plays a critical role as Lord Howe Islands only waste management service provider for the local community, with an expectation that it be able to adequately receive, store, handle and/or process a wide range of waste materials. It is therefore essential and expected that these wastes and the management options for the new WMF be thoroughly assessed and accounted for to prevent the ongoing waste management issues currently experienced on LHI.	The detailed design for the Waste Management Facility (WMF) will provide further detail on the key infrastructure to be included and how this will meet the waste processing and management needs of the island. The Principal Contractor will be responsible for the detailed design. Details on how the WMF will process and manage each waste stream will be included in the Operational Waste Management Plan and associated procedures. These documents will govern the operation of the WMF and will be developed, where relevant, in consultation with the EPA throughout the detailed design phase. The statement in the EIS regarding the quantity of "operational" waste expected relates to the facility itself, not the waste that is to be processed. It is noted that organics and liquid waste processing is currently the biggest challenge. Recognising this challenge, the design presented in the EIS included a dedicated organics processing facility. The design for this will be matured by the Principal Contractor and will accommodate the anticipated organic waste volumes including redundancy. Similarly, the design presented in the EIS recognised the need to increase liquid waste (not including wastewater) storage and included dedicated, bunded receival and storage areas. Liquid wastes will be stored in intermediate bulk containers. The issues with the current waste management facility have been considered in the design of the new WMF. The upgrades are in direct response to the issues observed with the current waste management facility and reflect the criticality of a fully functioning WMF to Lord Howe Island.	This table

Ref No.	Theme	Submission	Response	Where Addressed
EPA_02	Operational wastewater treatment and disposal	The EIS including Appendix AA do not provide sufficient information with regard to the generation and management of wastewater at the WMF. As per the EPA's SEAR's (issued 9/12/2024), EPA recommends that a detailed assessment of wastewater management options for the WMF be conducted. This assessment must: • Assess the concentrations and volumes of various pollutants expected in WMF wastewater and their sources, including from off-site pump out services involving wastewater, sludge and grease trap waste; • Ensure that proposed wastewater treatment system is adequately designed to treat pollutant loads to a standard suitable for its intended disposal option; • Any proposed irrigation/disposal area must be assessed for its suitability to receive the hydraulic and nutrient load without impacts to groundwater, Significant Native Vegetation, or the surrounding environment. • Include a detailed Wastewater Management Plan accounting for the proposed treatment and disposal method.	The detailed design of the wastewater management infrastructure will be the responsibility of the Principal Contractor. The design will consider the concentrations and volumes of various pollutants expected in wastewater, including their sources. It will also include how pollutants are to be treated to a standard commensurate with their disposal options (including testing of treated wastewater prior to disposal). Disposal options will be assessed for suitability commensurate with the quality of the wastewater. These details will be included in the Operational Wastewater Management Plan, which will be developed in consultation with the EPA.	This table
EPA_03	Contamination assessment and excess fill - North Zone	EPA notes the findings of this assessment and recommendation for excess soil excavated from this zone to be classified and potentially reused on LHI, subject to being granted a Specific Resource Recovery Order and Resource Recovery Exemption for this material. The EPA suggests that the proponent discuss this with the EPA in advance of the proposed construction works by contacting waste.exemptions@epa.nsw.gov.au.	A reduction in the volume of material to be excavated is expected when the Principal Contractor quantifies the final cut and fill volumes in the detailed design. The Proponent will arrange a meeting with the EPA to determine the pathway for resource recovery and exemption.	This table
EPA_04	Detailed Site Investigation – South Zone	The EPA generally accepts the findings presented in the DSI and associated Mitigation & Management Measures Cn3 – Cn7. The EPA confirms that materials either historically disposed to land or used as some form of fill on site under previous Environment Protection Licensing conditions may remain on site. This allowance is under the provision that these materials have a suitable and fully justified management pathway that mitigates any potential exposure risk to the environment or human health during both construction and operational activities.	Noted.	This table
EPA_05	Construction Environmental Management Plans (CEMP) & similar	The EIS refers to the development of CEMP's and sub-plans (eg Erosion and Sediment Control Plans) for construction activities in the Northern and Southern project areas. The EPA stresses the significance of these plans in addressing water quality, noise, air quality and waste management issues during construction and requests the opportunity to review and comment on these plans prior to commencement of construction.	Noted.	This table
EPA_06	Air quality	S3.4.2.1 of the EIS identifies a mobile batch plant is proposed in the North Zone Construction Compound. The concrete batch plant and concrete construction works in the North Zone have been identified in S6.2.1 of the Air Quality Impact Assessment as likely to have a Dust Emission Magnitude of "medium" and the highest dust emissions for the project. There are 22 sensitive receptors located within 250m of the North Zone. Specific dusts mitigation measures have been proposed in S7 of the Air Quality Impact Assessment, however, consultation with sensitive receptors has not been included. It is understood that community consultation for the project has been undertaken, however, targeted consultation is recommended prior to concrete construction work and the operation of the mobile concrete batching plant.	The risk-based assessment in Section 6.1.2.1 of the EIS was prepared in accordance with the *Guidance on the assessment of dust from demolition and construction* (IAQM, 2024) where Table 6-3 in this section concluded that the dust risk impacts for the North Zone during construction is at 'low risk'. This conclusion was based on the 'low' sensitivity of the area to potential dust impacts and the expected size and number of the mobile batch plant. Therefore, the mitigation measures proposed in Section 6.1.3 of the EIS / Section 7 of the Air Quality Impact Assessment (Appendix F of the EIS) were considered appropriate for the Project. Section 8 of the IAQM Guidance recommends that mitigation measures be updated as the design is progressed by the Principal Contractor. As such, any targeted consultation will be undertaken as required during the detailed design phase of the Project.	This table

Ref No.	Theme	Submission	Response	Where Addressed
EPA_07	Noise	The Airborne Noise Impact Assessment (ANIA) concludes that five residential sensitive receivers will be subject to construction noise below the Interim Construction Noise Guidelines (CNG) Highly Noise Affected Management Level but will exceed the ICNG Noise Affected Management Level for both total predicted noise level and noise from individual equipment. The ANIA recommends consideration of equipment selection and quantities to keep construction noise within the identified Sound Power Levels. In addition, EPA recommends targeted consultation with affected sensitive receivers prior to commencement of noisy works and that noisy works cease if a report in relation to noise is received. The matter should be investigated and remedied before noisy works recommence.	Targeted consultation will be undertaken as required during the detailed design phase of the Project. The design will be progressed by the Principal Contractor, specifically referencing the plant and equipment selected by the Principal Contractor. The CEMP will include measures to receive, record and respond to noise complaints.	This table
EPA_08	Vessel maintenance area	Section 1.2 of the EIS briefly mentions a new boat washdown and maintenance area to be included as part of the new marine infrastructure in the projects North Zone. The design of this facility must ensure that a hardstand area adequately captures and treats liquid and solid wastes.	As the design is progressed by the Principal Contractor, this will be considered during the detailed design phase.	This table
EPA_09	Dangerous and hazardous goods management	EPA recommends the provision of adequate impervious hardstands and bunding at: • the proposed self service fuel bowser located near the airport; • temporary fuel storage area in the North Zone; and • any relevant storage areas at the WMF. All fuel storages and pumps should be located on impervious hardstands with regular maintenance schedules in place to monitor system integrity. Spill kits must be in place at these locations.	As the design is progressed by the Principal Contractor, this will be considered during the detailed design phase.	This table

TABLE 4-6 ADVICE PROVIDED BY TFNSW MARITIME (MARITIME)

Ref No.	Theme	Submission	Response	Where Addressed
Maritime_01	Harbour Masters Directions	Vessels involved in construction or transport of materials to/from LHI must comply with Harbour Masters Directions and should seek advice from NSW Maritime via shipping@transport.nsw.gov.au.	Noted.	This table
Maritime_02	Vessel traffic management plan	NSW Maritime will, in consultation with contractors, develop and implement a vessel traffic management plan for the Lagoon and adjacent coastal waters to ensure safety and minimise navigational impacts on recreational and commercial vessel activities.	Noted.	This table
Maritime_03	Navigational aids	NSW Maritime will be responsible for relocation and/or installation of navigation aids. Consultation with contractors and relevant stakeholders will be managed by NSW Maritime.	Noted.	This table
Maritime_04	Marine pollution	NSW Maritime is the combat agency for marine pollution in State Waters surrounding Lord Howe Island. Contractors must comply with relevant legislation, including the *Protection of the Environment Operations Act 1997* and the *Marine Pollution Act 2012*.	Noted.	This table
Maritime_05	Mitigation measures	NSW Maritime supports mitigation measures ME1 and ME2 outlined in *_LHI+CIP_Appendix+C_Mitigation+and+Management+Summary_*	Noted.	This table
Maritime_06	Other matters	No other matters within the EIS are considered pertinent to NSW Maritime.	Noted.	This table

TABLE 4-7 ADVICE PROVIDED BY DPIRD-MP

Ref No.	Theme	Submission	Response	Where Addressed
MP-01	EIS project areas	I note the EIS and supporting documents have been prepared to cover two project areas: • The North Zone (Page 5) • The South Zone. (Page 7) Any proposed works or operations outside of these two areas have not been included in this assessment and should not be undertaken.	No works or operations in the marine environment will occur outside of these areas. The Principal Contractor has also confirmed that they do not intend to moor vessels outside the lagoon.	This table
MP-02	New vessel design and associated infrastructure	Unfortunately, the EIS does not include the new vessel details including design and operational parameters (e.g. vessel length, draft, requirements for controlled groundings, and ballast water requirements). The EIS also doesn't provide adequate justification that a range of cargo offloading/transfer mechanisms have been fully considered, for example, the use of a crane to unload cargo as currently performed by the existing Island Trader. Using a system that is like the existing operation would negate the need for additional marine infrastructure, including the proposed new piled vessel ramp, which would result in reducing the overall environmental impact and significantly reduce the overall cost of the project. Please note that we previously recommended that all potential vessel design options should be tabled along with the required marine infrastructure, before a final decision is made informed by local consultation.	The new marine infrastructure, freight vessel and operational parameters (i.e., containerised RoRo cargo handling) future-proof freight delivery for the Island. It will facilitate modern and industry-proven cargo operations that are in accordance with NSW Government standards. These aspects were the basis of the Business Case and were reflected in the NSW budget commitments for 2023-24; hence, the LHI CIP design and operations are fully supported by the NSW Government.	This table
MP-03	Marine infrastructure design	The main areas of direct relevance for the marine park are the areas of existing and new marine infrastructure in the North Zone, including upgrades to the existing jetty, construction of a new piled vessel ramp adjacent to the jetty, and upgrade of the existing boat ramp. As mentioned above, the EIS lacks detail to assess the environmental impact of both the construction and operational phase of the project. Reference to the use of mooring dolphins and other furniture lacks detail. We recommend minimising the use of marine infrastructure in this area, for example the incorporation of mooring dolphins will likely impact on local commercial and recreational vessel operations. Furthermore, lighting on any new marine infrastructure will also impact seabirds and other marine life, including turtles. The mooring dolphins and additional marine infrastructure should be removed from the design. If it's not possible to remove these based on the current vessel design parameters, then all options for a vessel design should be considered alongside the required, new marine infrastructure. In terms of policy guidance on the design of marine infrastructure, including jetties, seawalls and boat ramps, please refer to the relevant sections of the following documents below. Policy & Guidelines for Fish Habitat Conservation and Management (2013): • https://www.dpi.nsw.gov.au/fishing/habitat/publications/pubs/fish-habitat-conservation As a general principle provided in the policy and guidelines, NSW DPIRD requires that proponents should, as a priority, aim to avoid impacts upon key fish habitats. Where avoidance is impossible or impractical, proponents should then aim to minimise impacts. Any remaining impacts should then be offset with compensatory works. NSW DPIRD assesses activity and development proposals in relation to the general policies stated above and with consideration for the 'sensitivity' of the affected fish habitat. In this context, 'sensitivity' is defined by the importance of the habitat to the survival of fish (noting that 'fish' under the *Fisheries Management Act 1994* includes all aquatic invertebrates) and its robustness (ability to withstand disturbance).	A comprehensive assessment of potential impacts to the marine environment resulting from the Project was presented in the Coastal and Marine Ecology Assessment (O2 Environment, 2025). This included assessment of potential impacts from: • Construction of the new piled vessel ramp, including mooring dolphins; • Construction operations such as vessel movements, piling, risk of spills etc.; and • Operation of the new vessel and new piled vessel ramp. Similarly, the Underwater Noise Assessment considered potential impacts from construction (e.g., piling, vessels) and operational activities (e.g., vessels) on marine fauna. All assessments that informed the EIS were prepared in accordance with relevant guidelines, standards and legislation set out by the Project-specific SEARs and the SSI/CSSI framework. Section 6.3.3 of the EIS details the mitigation and management measures proposed to safeguard marine ecology including the preparation of: • Construction Vessel Operational Management Plan; • Marine Construction Environmental Management Plan; • Underwater Noise Management Plan; and • Marine Construction Monitoring Plan. The Proponent will engage with DPIRD-MP during the preparation of these and other relevant management plans. Recommended mitigation and management measures consider all potential impacts to marine biodiversity including fish and aquatic invertebrates, as well as abiotic factors such as water visibility and quality. These measures will be implemented pre-construction through to operations and will be updated as necessary. The Principal Contractor will consult the Policy and Guidelines for Fish Habitat Conservation and Management (2013) when preparing the detailed design.	This table

Ref No.	Theme	Submission	Response	Where Addressed
		The above document provides policy and guideline statements with respect to activities, developments, and impacts on key fish habitats. Table 1 defines those habitats that are considered 'key fish habitats'. The table also includes a fish habitat sensitivity ranking which is used within the policy and guideline statements to differentiate between permissible and prohibited activities or developments related to the importance of the 'TYPE' of key fish habitat. Waterway CLASS can be used to assess the impacts of certain activities on fish habitats in conjunction with the habitat sensitivity TYPE. The waterway CLASS scheme can also be used to make management recommendations to minimise impacts on different fish habitats. According to the policy, the Lord Howe Island Lagoon is a TYPE 1 – Highly Sensitive Key Fish Habitat, CLASS 1 Major key fish habitat Marine or estuarine waterway. Chapter 5 of the policy relates to foreshore works and waterfront development including the development of foreshore structures including jetty and wharves and boat ramps. This section outlines NSW DPIRD's policies and guidelines in relation to typical proposals for foreshore works, which should be incorporated into this project. Further design and best practice guidance can be found in the following documents: • NSW Coastal Design Guidelines (2023): https://www.planning.nsw.gov.au/sites/default/files/2023-10/nsw-coastal-design-guidelines-2023.pdf • Reducing Coastal Threats to Marine Biodiversity https://www.marine.nsw.gov.au/__data/assets/pdf_file/0003/1403139/Reducing-coastal-threats-to-marine-biodiversity.pdf		
MP-04	General risk of construction in proximity to marine park	As previously mentioned, the nature and the scale of the works pose a high risk in terms of potential impacts to the LHIMP; these include but are not limited to; effects on ecological communities; the increased likelihood of water pollution events to occur due to stormwater and sediment run-off, increased erosion, concrete wash out, wastewater and stockpile management, and hydrocarbon spills. We stress the importance of the need to minimise harm to the natural environment both at the work sites for marine infrastructure and adjacent to the marine park. We anticipate the implementation of best management practice with respect to stormwater, erosion and sediment control and habitat management at the relevant sites. Due to the high volume of disturbed sediments that will occur as a result of work associating with the levelling of the lay down area adjacent to the jetty, all erosion and sediment controls are in accordance with Managing Urban Stormwater, Soils and Construction guidelines; 4th Edition Landcom 2004 (The Blue Book) and Managing Urban Stormwater, Soils and Construction Guidelines, main road construction (The Blue Book 2, 2009). The determining authority and contractors should acknowledge their obligations under the Protection of the Environment and Operations (POEO) Act with respect to pollution control at the site. For further technical advice on the design and management of appropriate stormwater and sediment control systems for these works please contact the Environment Protection Authority (EPA). With respect to the management of stormwater and wastewater within the area of works, the water quality should comply with the water quality expressed in the NSW Water Quality Objectives (WQOs) developed in accordance with the ANZECC 2000 Guidelines on water quality. Of concern is any discharge of construction wastewater. We stress that all water discharged from the area of the works and delivered to LHIMP should meet the water quality requirements.	Noted. The Proponent and Principal Contractor commit to industry best practice for stormwater, erosion and sediment control. Management plans that include these measures will be prepared in consultation with the relevant government agencies and authorities, and will consider relevant guidelines, policy and publications.	This table

TABLE 4-8 ADVICE PROVIDED BY CASA

Ref No.	Theme	Submission	Response	Where Addressed
CASA_01	Impacts of aircraft noise	Noise issues are covered in the AIA. CASA has no regulatory responsibilities regarding aircraft noise and aircraft noise issues are a matter for the Planning Authority.	Noted.	This table
CASA_02	Building-generated windshear and turbulence at airports	CASA agrees with the coverage in the AIA. The AIA advises: 'the South Zone may need further assessment to evaluate potential impacts from building-induced windshear and turbulence' Wind Tunnel or Computational Fluid Dynamics modelling is not considered necessary in this case due to the conservative nature of the trigger criteria, the relatively small bulk of the individual buildings, the result of the desktop study by Aviation Projects and the buildings not being immediately adjacent the final approach or touch down areas. If anything is going to cause wind shear, it is the terrain.	Noted. Wind shear from structures would be minimal and within acceptable thresholds and, therefore, a detailed windshear assessment is not required.	This table
CASA_03	Wildlife strikes in the vicinity of airports	CASA agrees with the coverage in the AIA. The AIA advises: 'Any site features or activities with the potential to attract wildlife must be systematically identified, assessed, and managed. Engaging a wildlife hazard expert may be necessary to support the assessment and management process.' A wildlife hazard expert is probably not necessary if the waste handling process and infrastructure will not change a lot and if the Airport or LHIB staff have the (local) knowledge to identify, assess, and manage the wildlife (especially bird) hazard. It is expected that there would be other serious bird attractors close to the airport; for example forest, lagoon, sea life etc. However, bird (especially) and animal attractors should be avoided. For example: • Waste should be stored in closed containers. • Land use avoiding standing fresh water. • Landscaping should avoid use of trees and shrubs attractive to birds. • Avoid bird perching opportunities where practicable. • Organics Processing Facility should be to a practical extent sealed / birdproof.	Noted. The current operational procedures for the waste management facility would be sufficient to manage potential wildlife hazards. As the design is progressed by the Principal Contractor, potential animal attractors as suggested will be considered during the detailed design phase and will update any operational procedures where applicable.	This table
CASA_04	Distractions to pilots from lighting in the vicinity of airports	CASA agrees with the coverage in the AIA. Lighting is unlikely to be an issue if the airport is not normally used at night. The main aim is not to have security / street lights etc 'shining upwards' and not to have green or red or white arrays of lights that could be confused with threshold or runway end or runway side lights respectively. Also, depending on the location of the buildings; roof materials and solar panels should be selected taking daylight glare potential into account.	Noted. Security/street lighting will not be directed upwards or have green, red and white arrays that could be confused by pilots with airport runway lighting. Potential glare from roof materials and panels will be considered in the selection of building materials during the detailed design phase.	This table
CASA_05	Intrusions into the protected airspace of airports	CASA has no major issues with the coverage in the AIA. CASA is happy to assess temporary construction equipment such as cranes as requested by Lord Howe Island Airport. Normally temporary infringements by cranes of the transitional surface can be mitigated (provided the infringements are not extreme).	Noted. The Applicant will notify CASA and YLHI of any temporary construction equipment such as cranes that would be stored and/or operated in close proximity to the airport and could pose a potential hazard to the operation of aircraft from the airport.	This table
CASA_06	Protecting aviation facilities — communications, navigation and surveillance (CNS)	Airservices Australia would review any proposed facilities that could affect aviation related communications/navigation.	Noted.	This table
CASA_07	Public safety areas at the ends of runways	It is unlikely that Public Safety Zones apply at Lord Howe Airport. In any case, the proposed infrastructure is outside the sample zones provided by the NASF Guideline.	Noted.	This table
CASA_08	Plume rise assessments	If there are any significant plumes/effluxes/stacks/emissions, CASA has a screening software tool to check whether they could be hazardous. All we need is location, stack height, exit diameter, exit velocity, exit temperature. Submit these parameters on a form 1247 to Airspace.Protection@casa.gov.au. However, the only plumes that turn out to be issues are major power stations or LNG plants.	Noted. The Project is not expected to result in significant plumes, effluxes, or emissions that could be hazardous to aircraft operations. Details of plume stacks will be provided to CASA during the detailed design phase.	This table

TABLE 4-9 ADVICE PROVIDED BY DPHI

Ref No.	Theme	Submission	Response	Where Addressed
DPHI_01	Visual impact	The Visual Impact Assessment provided at Appendix K – Urban Design Report does not provide indicative photomontages of how each viewpoint would appear with the proposed infrastructure and built form components constructed. This is particularly important for the north zone, where key infrastructure such as the stuffing/ unstuffing shed, vessel ramp, and dolphin pilings present a potentially high visual impact from multiple scenic and world heritage value viewpoints. Please provide a revised Visual Impact Assessment that presents indicative operational photomontages of each viewpoint, clearly showing key infrastructure such as the stuffing/unstuffing shed, vessel ramp, and dolphin pilings as they are proposed to be sited. Further, while various viewpoints of the existing north zone and south zone sites have been assessed, no viewpoint looking south along Lagoon Road (in the north zone) towards the proposed stuffing/unstuffing shed (showing the lagoon, Mount Lidgebird and Mount Gower beyond) has been provided as part of the EIS or Appendix K – Urban Design Report. Please incorporate the viewpoints of the stuffing/unstuffing shed as viewed from Lagoon Road (as emailed to the Department on 19 November 2025) as part of your response, inclusive of key world heritage viewpoints.	The Landscape Character and Visual Impact Assessment (VIA), included in Section 7 of the Urban Design Report (UDR) (**Appendix D**), has been updated to include photomontages to demonstrate how the infrastructure will appear from the following viewpoints: • Viewpoint 1 – Kim's Lookout; • Viewpoint 2 – Old Settlement Beach; • Viewpoint 3A – Lagoon Road; • Viewpoint 3B – Existing Jetty; • Viewpoint 4 – The Lagoon; • Viewpoint 5 – Memorial Lookout; and • Viewpoint 6 – Lovers Bay. All photomontages include key infrastructure where applicable. The newly added Viewpoint 3A looking south along Lagoon Road, shows the proposed Unstuffing Shed where the view of Mount Lidgbird and Mount Gower is shown to increase at this location upon minor vegetation clearing for the proposed infrastructure.	Figures 83, 85, 87, 89, 91, 93 and 95 of **Appendix D**
DPHI_02	Mooring dolphins	The EIS indicates four mooring dolphins are proposed to be installed (12 x 762mm steel piles) in the north zone, which is likely to generate underwater noise during construction, and visual and boating access impacts during operation. Please provide further information to justify the proposed construction and operation of four mooring dolphins, including an assessment of potential impacts during construction and operation.	The Underwater Noise Assessment (Resonate, 2025) included the assessment of piling (i.e., installation of piles for the vessel ramp and mooring dolphins). The assessment concluded that piling presents a low risk of impacts for most marine fauna. Potential impacts on some fish species were assessed as potentially high, although temporary and can be managed. The VIA (Section 7 of **Appendix D**) included the assessment of mooring dolphins. This has been updated to provide further context and photomontages of the dolphins from the following viewpoints: • Viewpoint 1 – Kim's Lookout; • Viewpoint 2 – Old Settlement Beach; • Viewpoint 4 – The Lagoon; • Viewpoint 5 – Memorial Lookout; and • Viewpoint 6 – Lovers Bay. Potential visual impacts relevant to the mooring dolphins have not changed compared to those assessed in the EIS. The additional mitigation measure to minimise their visual impact relates to their final built form due to their functional necessity along the existing jetty. A proposed mitigation measure is to reduce the size and number of dolphins from a 2-m wide quadruple sequence to a smaller-diameter triple sequence to achieve the same function. Impacts relating to vessel access during operations were considered. The design presented in the EIS was a 20% Concept Design and aimed to provide infrastructure to meet relevant safety and operational requirements. The inclusion of mooring dolphins will allow the new vessel to operate in a manner that avoids or minimises impacts to the marine environment and allows for safe operations within the jetty area. The mooring dolphins are navigable to recreational and commercial vessels when cargo operations are not undertaken. It is noted that currently vessels can access the head of the existing jetty when the Island Trader is alongside (for an average of four days per fortnight). During detailed design, the configuration of mooring dolphins will consider commercial boating activities to facilitate access to the head of the existing jetty where practicable. The detailed design of the marine infrastructure is to be revised and progressed by the Principal Contractor in conjunction with the Vessel Constructor, upon Letter or Award (LOA) for the marine infrastructure works.	Figures 83, 85, 91, 93 and 95 of **Appendix D** This table
DPHI_03	Design and place	It is unclear how advice provided by the Government Architect NSW (GANSW) through the State Design Review Panel (SDRP) (letter dated 27 March 2025) has been addressed in the EIS or Appendix K – Urban Design Report. Please provide a response table that clearly outlines how the proposed design has responded to each recommendation provided by GANSW through the first SDRP review. Please clarify whether the Proponent proposes to have a second SDRP review undertaken for the proposed project.	The updated UDR (**Appendix D**) includes a new "Appendix 2 - SDRP Responses", which provides responses to the SDRP Advice Letter. The Project Methodology description on Page 8 has been amended to refer to the SDRP presentation and the new Appendix. The Proponent proposes to hold a second SDRP at 80% detailed design, in agreement with the Principal Contractor, novated Project Architect and novated Landscape Architect.	Appendix 2 of **Appendix D**

Ref No.	Theme	Submission	Response	Where Addressed
DPHI_04	Crown land	The EIS indicates that all of Lord Howe Island is Crown Land under leasehold, however, advice provided by Crown Lands indicates that there is no Crown Land within the construction footprint. Please clarify the tenure of land impacted by the project.	Pursuant to the *Lord Howe Island Act 1953*, all land on the island is vested in the Crown but under the management of the Lord Howe Island Board.	This table
DPHI_05	Employment	While the EIS notes that the construction program is approximately 20 months and the peak period would be from 6-19 months, please outline what considerations have been/can be made to the construction program so that peak construction occurs outside of the peak tourist season (October to April)? Please outline what other measures could be considered to mitigate impacts to tourism operators (other than accommodation) during construction?	The Principal Contractors construction program is approximately 20 to 22 months. This includes 6 months of detailed design that will overlap with mobilisation to the Island and low impact early works, inclusive of site clean-up (WMF) and preparation of site amenities. The main construction works are expected to take approximately 18 months, from Q2 2026 to Q3 2027. The construction program was optimised with the intention that most works will only overlap one peak tourist season. Significant construction works and periods of peak workforce on the Island will be scheduled, where possible, during off-peak periods. The Principal Contractor will compile a resource histogram which will be implemented to forecast the number of construction personnel on-island throughout the construction period. Where practicable, suitably qualified local tradespeople will be employed to minimise impacts that may be associated with construction personnel influxes on the island. A Communication Plan will be prepared by the Principal Contractor to ensure residents, businesses and tourist providers are kept informed in advance of construction activities. Key information is planned to be communicated with the LHI Tourism Association. The Proponent and LHI Tourism Association agreed to proactive communications and broadcasting a positive message on the project and improvements.	This table
DPHI_06	Access and connectivity	The EIS states that the road speed limits are low due to the low population of the Island, narrow corridors, and wildlife conservation efforts. However, additional traffic movements between the north and south zones may increase safety risks, particularly for elderly pedestrians and tourists during peak season on bicycles. Please outline what consideration has been given to this risk? The Department notes the beach/rock platforms between the jetty/wharf and boat ramp were identified as an informal community gathering spot. Please clarify if access would be maintained to the boat ramp and surrounds during construction, particularly community events? Are other alternative venues available?	The Traffic and Transport Impact Assessment (Appendix Y of the EIS) recommended limiting the speed of construction vehicle traffic to 10 km/h near areas of high pedestrian use and that temporary areas for vehicles passing be included on Old Lagoon Road. Driver training will include procedures to minimise risk to pedestrians, cyclists, animals, other vehicles etc. The Principal Contractor will prepare a Traffic Management Plan as part of their Construction Environmental Management Plan (CEMP) and will be responsible for the maintenance of roads used during construction. The intention is for the Principal Contractor to maintain a construction footprint as small as possible to lessen the impact to road users.	This table
DPHI_07	Access to health services	Noting the limited health facilities on the Island, please outline what consideration has been given to medical attention in the event of a medical emergency or severe workplace accident?	The Principal Contractor is a specialist in remote location work and has acknowledged the importance of being self-sufficient in an emergency. The Principal Contractor will detail an Emergency Plan in the CEMP that does not rely on local medical facilities and will account for measures including but not limited to: • Worker medical risk screening; • On-island first aid and clinical capability; • Communication protocols and medical escalation pathways; and • Evacuation and transport arrangements including weather contingencies.	This table
DPHI_08	Tourism	Please clarify what is meant by the project increasing tourism and associated demand for marine infrastructure? Does this mean more tourists/tourism providers would be wanting to use the infrastructure (rather than there being more tourism, given the limits on accommodation)?	The new marine infrastructure and associated works in the North Zone will improve the quality, safety, and functionality of the public foreshore, providing a more inviting and accessible space that enhances visitor experience and strengthens the area's appeal. This does not imply an increase in total visitor numbers beyond existing accommodation limits; rather, the tourists who already visit and existing tourism operators will be able to use the marine facilities with more reliable, efficient, and orderly access. Section 7.1 of the EIS presents this intention as part of the Project's design refinement since its scoping phase.	This table

5. RESPONSE TO PUBLIC SUBMISSIONS

This section provides responses to the submissions received from the public. Submissions have been grouped by themes as described in **Section 2**. A submission reference number (ID) is provided so that stakeholders can identify where the issues they raised have been considered. **Appendix A** identifies each specific stakeholder reference number.

As outlined in **Section 2.1**, 33 submissions were received from the public. Submissions received had similar themes and therefore most of the responses detailed below relate to multiple submissions. Dedicated section headings are provided for overall theme topics. Examples of specific quotes from the submissions (copied verbatim) are provided for each theme to provide context. These excerpts were selected to best represent the diversity of submissions for each theme.

Note that a single submission may cover numerous issues and while this does not alter the overall number of submissions, such submissions were split between themes where appropriate. Within each theme table, submissions in support of the Project are highlighted green; comments highlighted white; and objections highlighted grey.

5.1 THE PROJECT

5.1.1 PROJECT LAYOUT

TABLE 5-1 EXAMPLES OF SUBMISSIONS REGARDING THE PROJECT LAYOUT

Submitter ID	Example Text From Submission
SE-97029957	The proposal blocks public and pedestrian access to the jetty during ship operations, which is unacceptable - a safe access walkway and waiting area is essential! …Excluding the boat ramp in this immediate project works is a major safety oversight and must it be included!
SE-99051974	Unstuffing building…Move the quarantine and post rooms to opposite end of building, with the post room access from within the building.
SE-99557208	Having a road to access the boat ramp to the north of the Un-stuffing shed is totally unnecessary. We can all work together here, so if someone needs to put their boat in or out of the water they can still do so by driving through the normal way. Don't block access just because the ship is in never has never will.
SE-98816236	I've attached a drawing from the proposed plan highlighting an area I believe should be opened up as part of the driveway into the unloading area. Otherwise it will be a bottleneck for trucks and forklifts entering and exiting. It will also create a blind spot for traffic heading south along the Lagoon Road.
SE-99334716	The 'Unstuffing Shed' in the Northern Zone would be better if the roofline was in keeping with the other existing sheds already in place and ideally moved to be in line with the existing Marine and Cargo sheds. This wouldlessen the impact of buildings in the area.
SE-97971472	The construction of the ramp will impede the use of the south side of the wharf… …An area to facilitate mail storage/sorting is unnecessary in this precinct.

Submitter ID	Example Text From Submission
SE-98889215	The proposed unstuffing shed and external storage hardstand may not physically fit within the constrained precinct and could affect visual amenity and access… …The push to enclose more of the vessel to keep non-containerised cargo under cover effectively replicates what the existing mixed-freight model already provides… …Containerisation may therefore duplicate, rather than enhance, existing functionality.
SE-98422463	Furthermore, the proposed biosecurity dog kennel premises is of a completely preposterous size and occupies valuable land space that could be used for far more valuable purposes such as agriculture. Positioning the main fuel depot at the Southern end of the Island is also totally ridiculous!

The Project does not permanently block public access to the jetty. Construction impacts will be temporary and staged to maintain access as much as possible. Temporary exclusion zones during vessel operations will be required for safety and will be consistent with standard maritime industry practice and legislation. The design incorporates a dedicated pedestrian waiting area and delineated safe access paths to maintain public connectivity whenever operations allow. Operational procedures will ensure minimal disruption to community access.

The new fixed piled vessel ramp will not prevent the use of the southern side of the existing jetty outside of freight operations, where most of the ramp structure will traverse foreshore typically unnavigable by a range of vessels. The public boat ramp will be refurbished to make it suitable for larger recreational vessels up to 18 m in length which will facilitate greater range of access to this precinct. Safety considerations associated with recreational vessel access will be managed through traffic controls and operational protocols.

The proposed form and location of the unstuffing shed were selected to meet height clearance, access geometry and biosecurity requirements. Due to the cut required to level this area at this stage of design, the unstuffing shed would recede 1.5-2 m from Lagoon Road which is expected to reduce its impact on visual amenity, and view of the lagoon. Full alignment with existing structures is not feasible and may result in the unstuffing shed roof height being higher than expected. Material selection and treatment will reduce visual bulk and maintain consistency with the wider precinct. Visual impact mitigation measures will be incorporated, for e.g., through use of appropriate colours, materials and strategic landscaping.

The arrangement of internal rooms within the unstuffing building has been determined based on quarantine compliance, workflow efficiency and separation requirements. A dedicated space is required to consolidate freight and mail handling within a controlled environment that meets biosecurity and operational requirements. The area is compact and sized only to meet minimum functional needs.

A northern access connection is required to maintain service access and allow safe separation between freight vehicles and public traffic. Relying solely on the existing shared access would increase potential traffic between recreational users and heavy equipment during shipping operations and does not meet safety obligations. Vehicle movement modelling undertaken at this stage of design indicates that the proposed layout provides adequate turning movements and queue capacity. Adjustments to sightlines and boundary fencing will be incorporated and resolved during the detailed design phase where required to address potential blind spots on Lagoon Road.

Containerisation does not duplicate existing functionality but consolidates freight handling providing a safer, bio-secure and weather-protected system. Selected mixed-freight practices will be retained where operationally appropriate.

The proposed dog kennel area is designed to meet animal welfare and working-dog standards, including acoustic separation, shelter, and safe handling spaces. Its footprint is modest relative to the operational requirements and does not impact on availability of viable agricultural land as it is reserved for infrastructure.

The location of the fuel bowser has been selected based on safety setbacks, separation from incompatible land uses, greater accessibility above the flood level, and emergency response requirements. The southern siting achieves compliance and reduces risks associated with fuel handling. The location is adjacent to the airport and WMF that will be accessed regularly by most vehicles requiring fuel.

In summary, the Project layout has undergone spatial testing to ensure all built elements fit within the precinct boundary while balancing required setbacks, circulation space and safe vehicle movements.

5.1.2 DESIGN OF THE VESSEL RAMP

TABLE 5-2 EXAMPLES OF SUBMISSIONS REGARDING THE VESSEL RAMP

Submitter ID	Example Text From Submission
SE-99688226	The new design relies entirely on a fixed ramp. If this ramp fails, due to weather, mechanical issues, or physical damage, the island may be cut off from essential supplies. This introduces a significant operational risk that is not present in the current lift-on/lift-off (Lo-Lo) system, which offers flexibility and redundancy… …Despite the EIS presenting containerisation and roll-on/roll-off (Ro-Ro) as "more efficient," these claims are unproven under Lord Howe Island conditions…. This design eliminates the operational flexibility that the current system relies on.
SE-99828487	The new vessel appears to be designed primarily to accommodate containers, but now includes a sheltered area, suggesting containerisation alone is not suitable for the island's needs… …Loss of operational flexibility increases the risk of emergency responses or stop-gap operations, which can be much more impactful to the environment, especially in a lagoon setting without room for backup infrastructure.
SE-98889215	The ramp converts a flexible, low-impact jetty into a single-purpose mechanised structure that, if damaged, removes all unloading capability. The EIS should quantify these impacts, model sediment movement and view-lines, and demonstrate that less-impacting alternatives were considered.

The inclusion of a fixed piled vessel ramp has been raised as a potential single point of failure; however, the ramp has been engineered with structural redundancy, weather resilience and protective features that significantly reduce the likelihood of operational disruption. Contingency arrangements including alternative vessel positioning and emergency lifting capabilities will ensure essential freight can still be delivered in various circumstances. The design therefore maintains supply security while improving overall safety compared with the current manual LoLo system.

Concerns about loss of operational flexibility and the suitability of a Ro-Ro/containerised system under Lord Howe Island conditions are noted. In response to community feedback, the inclusion of a sheltered area accommodates non-containerised freight and preserves mixed-freight capability, meaning the new system enhances efficiency without removing adaptability for atypical loads or emergency requirements.

The EIS has assessed alternatives, hydrodynamics, sediment movement and visual impacts, confirming the proposed design has a lower long-term environmental footprint than options requiring larger structures or development within the southern end of the lagoon. The ramp is integrated in a way that maintains broader jetty functionality outside shipping operations and seeks to avoid conversion into a single-purpose structure. Operational contingencies will be accounted for with the selected operator such as via business continuity plans. Overall, the Project reduces the risk of unplanned or high-impact emergency operations and provides a safer, more resilient maritime freight system for the island.

5.2 PROCEDURAL MATTERS

5.2.1 LEVEL AND QUALITY OF ENGAGEMENT

TABLE 5-3 EXAMPLES OF SUBMISSIONS REGARDING THE LEVEL AND QUALITY OF ENGAGEMENT

Submitter ID	Example Text From Submission
SE-97610493	Most importantly, I hope this project continues to involve local voices so it feels genuinely community-led – aligning progress with the island's values of preservation, sustainability, and shared responsibility for future generations
SE-99051974	Many have commented that the plans are hard to visualise… …Many work and can't take time off to attend the previous consultations… …any changes to the designs must require detailed consultation with the community, including a list of all changes since the previous plans were consulted with the community.
SE-98390957	The consultation process is not adequate for this project and the reports in the EIS are lacking in input from the community… …The community representative feedback has largely been ignored and there has been no representation of the Tender Review Committee…
SE-98630228	I am writing to convey my dismay at the deficiencies of the consultation process regarding the current DA for the Critical Infrastructure Program… …A process of consultation and input from local community has not been adequately undertaken… …The consultant could assist the community members of the CCG to fully understand and comment on the technical aspects of the Consultant's reports… …The Board website has regular updates to the community without any input from the community through the CCG. The CCG's comments should be made available to members of the public via the LHI Board website.

Submitter ID	Example Text From Submission
SE-99677477	While the EIS lists engagement activities, the quality and depth of consultation has been misrepresented. The population of Lord Howe Island is small, yet only 53 survey responses were received in Phase A and four submissions – numbers far too small to claim community endorsement of a project of this significance. With a population of over 400 it would be interesting to see if these 53 survey responses were from Residents (as determined under the LHIReg/act)
SE-98422463	The whole plan has been devised in a manner that fails to take into consideration the opinions and desires of the community. It is negligent towards the communities needs and is completely flawed. Everything in this plan needs to be reconsidered with community consultation and input.
SE-98894457	The opinions and suggestions of Generational Islanders and long term residents need to be taken into consideration before any decision is made on this project.
SE-98881958	Comments from the Local consultation committee have not been listened to.
SE-99523458	A consultation group was formed for this project. Their questions and concerns and advice and decades and lifetimes of knowledge and experience have not been heard. The box has been ticked to say "we consult with the community" but the reality is that you have not.
SE-99638714	The Island needs a replacement ship similar to the current one with some upgraded detail, advice on which can come from local experience and 30 years of knowhow. Previous skippers such as Lance Knight are also valuable source of knowledge and should be sought after. The authorities need to be very careful in their decisions for the future of the Island depends on it. Local knowledge is always the best source.
SE-99808708	My concerns are the lack of engagement with business owners and community members, and the lack of transparency from the LHIB. The community has not been considered and the recommendations they have voiced gallantly against the project have not received a satisfactory response to warrant this to go forward. Further consultation with the community is needed, it needs to expand to an online discussion, so those not able to physically attend community engagement opportunities can express their concerns. A quarterly check in to update the community on the progress – like any major project would do with their workers.

The engagement program provided a range of opportunities for participation, including public consultation sessions, online information, monthly householders, community members as representatives on the bi-monthly Community Consultation Group, and written feedback mechanisms. Feedback regarding accessibility and clarity has been noted and will inform how information is communicated during subsequent engagement and ongoing opportunities to contribute as the Project progresses.

It is acknowledged that some community members feel their comments have not been sufficiently reflected in the EIS or that their technical insights should be incorporated more explicitly. The Proponent recognises the value of local expertise and will continue to ensure that community and stakeholder insights remain part of decision-making. Additional structured engagement with community representatives, including community representation on the Project Control Group during detailed design phase, on-going bi-monthly Community Consultation Group meetings, community information sessions, tailored briefings for those with specialist knowledge will be undertaken to ensure local experience continues to inform detailed design and delivery. Community Consultation Group Minutes and Presentations are publicly available on the website - Community Consultation Group | Lord Howe Island Board.

5.2.2 LEVEL AND QUALITY OF ASSESSMENT

TABLE 5-4 EXAMPLES OF SUBMISSIONS REGARDING THE LEVEL AND QUALITY OF ASSESSMENT

Submitter ID	Example Text From Submission
SE-98390957	The economic modelling and financial feasibility studies are weak and lack credibility without transparency as to assumptions and impact of freight costs with no sensitivity analysis or detailed Business Case.
SE-98630228	What is lacking in an "Executive Summary" of manageable proportions that would enable Island residents to gain an overview of the Critical Infrastructure Program… …The Financial and Economic reports are vague and lack detail about assumptions on which they are based.
SE-98889215	The ramp converts a flexible, low-impact jetty into a single-purpose mechanised structure that, if damaged, removes all unloading capability. The EIS should quantify these impacts, model sediment movement and view-lines, and demonstrate that less-impacting alternatives were considered… …Failure of a thruster during manoeuvre increases the risk of grounding, creating a higher environmental hazard than the current manual mooring system. The EIS should assess sediment plume extent, turbidity, and emergency-response implications… …Around the world, effective biosecurity is retrofitted to existing systems. There is no reason Lord Howe cannot achieve a high-grade, compliant standard without major structural change. The EIS should show how biosecurity objectives can be integrated into a proportionate, low-impact design rather than dictating the entire form of the vessel and wharf… …Containerisation may therefore duplicate, rather than enhance, existing functionality. The EIS should demonstrate that the spatial, traffic, and aesthetic impacts of container handling have been accurately assessed and that operational efficiency gains are real, not assumed… …The EIS should assess the social and economic feasibility of the proposed system by evaluating: Training requirements and costs; Maintenance dependency on mainland contractors; The effect on local employment continuity; and The resilience of freight operations if key personnel are unavailable… …In my professional opinion, the potential efficiency gain from a shallower-draft vessel is minor (perhaps a few extra hours per tidal window) and remains unproven. The EIS should present tide-corrected data comparing turnaround time, fuel use, emissions, maintenance, and weather downtime between models. Without verified metrics, “efficiency” cannot be accepted as justification for major environmental change… …If the system proves incompatible, those impacts will be permanent. The EIS should therefore assess community character, landscape values, and cumulative lifestyle implications alongside technical impacts, ensuring that the project enhances - not erodes - the Island’s heritage and way of life… …The EIS should focus on evidence-based improvement, not reinvention, ensuring that future generations inherit a system that works as well as the one that has sustained us for the last fifty years.

Submitter ID	Example Text From Submission
SE-99807707	The EIS clearly fails to adequately address the ecological and heritage impacts of this development… …Although the EIS claims no threatened flora species were recorded, it concedes that species such as Knicker Nut and Sand Spurge have a moderate likelihood of occurring in the project area. Dismissing their presence based on limited surveys ignores the well-known limitations of point-in-time ecological assessments… …These impacts are minimised in the EIS through vague language such as "unlikely to significantly impact," without robust, species-specific assessment or exploration of less intrusive alternatives… …The EIS asserts that the project will "not significantly impact World Heritage values" but provides: • No independent heritage integrity assessment • No comparative studies of landscape character impact • No rigorous analysis of cumulative effects • No modeling of long-term visual or ecological change A project of this scale—marine ramps, expanded industrial zones, increased built footprint, major vegetation clearing—would trigger intense scrutiny in any other World Heritage site.

The EIS included detailed assessments of environmental factors in accordance with the SEARs at a level appropriate for this stage of the statutory planning process. For example, the ecological impact assessments (Sections 6.2 and 6.3 of the EIS) incorporated field surveys, habitat evaluation and significance testing in accordance with relevant guidelines. Perceived inadequacies of these assessments must note the parameters of the Project's current design stage where more specific assessments and analyses will be carried out during the detailed design phase. This includes for factors such as sediment disturbance, turbidity and risk controls for vessel operations, as well as operational planning measures such as workforce training, maintenance and maritime traffic protocols.

The business cases for the marine freight service were the basis for the program funding by the NSW Government and the conceptual design of the Project and subsequent iterations of the Master Plan. The EIS provides strategic-level analysis suitable for this stage of assessment and is not intended to serve as a full business case. The modelling outlines indicative cost drivers, operational considerations and freight-handling requirements, rather than determining factors such as future pricing structures or detailed tariff impacts. The level of detail including assumptions and sensitivity considerations reflects the preliminary design stage. Requests for more concise summary material are noted as matters of presentation rather than assessment scope.

The EIS evaluates the operational implications of the proposed freight-handling system including layout, circulation, storage requirements and integration with vessel design. Efficiency considerations are assessed in relation to reduced manual handling, improved safety and more consistent operational windows. The analysis compares freight-handling approaches at a strategic level and considers resilience, maintainability and long-term serviceability in selecting the preferred configuration. Alternative operational modes and lower-impact configurations have been considered throughout the design iterations of the Project, with the proposed arrangement selected based on overall safety, functionality and compliance constraints. Refer to **Section 5.4** for details.

The assessment of impacts to the World Heritage values was included in relevant technical reports. While there is not a standalone assessment report consolidating the various assessments, the relevant aspects of the outstanding universal values for which Lord Howe Island was nominated and inscribed on the World Heritage List were considered. The Proponent is acutely aware of their obligations to protect and enhance the World Heritage values of the Island. This was a core consideration in all decision-making. It is acknowledged that there will be temporary impacts; however, the assessments concluded that these would not diminish the outstanding universal values of the World Heritage area.

5.3 ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS

5.3.1 BIODIVERSITY

TABLE 5-5 EXAMPLES OF SUBMISSIONS REGARDING IMPACTS TO THE AQUATIC ENVIRONMENT

Submitter ID	Example Text From Submission
SE-99688226	As someone with experience in lagoon management, I am concerned that: • Sediment resuspension will degrade water clarity • Thruster use will disturb benthic ecosystems • Lagoonal habitat and biodiversity will be at risk • Access for service and tourism vessels will be constrained
SE-99828487	The larger vessel's thrusters will be operating in a narrow, shallow lagoon, physically closer to the sea floor, reef, and seagrass beds… This exposes the lagoon to: • increased sediment resuspension • turbidity and light reduction • impacts to marine communities • potential physical scouring from thruster wash
SE-98889215	Continuous thruster use will disturb the benthic environment by resuspending fine sediments and affecting lagoon ecology.
SE-99807707	Marine species associated with lagoon reef ecosystems will be disturbed by reef trimming, piling, propeller wash, and increased vessel activity.
SE-99677477	Marine impacts associated with new piling, ramp construction, and vessel operations – activities that the EIS itself admits require removal or trimming of rock reef habitat. These impacts are incompatible with the World Heritage protections of Lord Howe Island and with the stated purpose of safeguarding biodiversity.
SE-98422463	The notion of installing dolphin pilings would…compromise the lagoon floor's sensitive ecosystem.

The EIS provided a qualitative assessment of potential impacts to the aquatic environment. This included an assessment of potential seabed disturbance associated with construction works and vessel manoeuvres in the lagoon, underwater noise and general construction activities that may lead to pollution. Habitat removal associated with piling and ramp installation is confined to small and targeted areas necessary to facilitate safe vessel access. The assessment concluded that effects are expected to be limited in extent and duration based on the nature of the seabed in the areas of disturbance and the scale of works.

Section 6.3, 6.25 and 6.26 of the EIS outline the controls that will be implemented to minimise impacts. This will include restrictions on construction timing, method and the positioning of vessels. These measures will be developed further during the detailed design such that they are appropriate for the activities that the Principal Contractor intends to undertake. They will be designed to minimise physical impacts to the seabed such as groundings and minimise impacts to water quality associated with spills and increased turbidity.

The potential for underwater noise impacts was assessed in a dedicated Underwater Noise Assessment. This considered the generation and propagation of underwater noise associated with construction activities such as piling and vessel movements. Section 6.18 of the EIS summarized that there was a low risk of impacts to marine fauna such as cetaceans and turtles. Some fish species were assessed to have a higher risk of impact; however, this can be managed and would be temporary. The EIS detailed comprehensive measures to minimise these impacts include staging, soft-start procedures and implementing safety zones to protect the lagoon's aquatic biodiversity from physical harm.

The Underwater Noise Assessment assumed that during operations there would be no more than one vessel per day moving through the North Passage with a speed of 10 knots, with a total equivalent operating period of 5 minutes over a 24-hour period. It is assumed the vessel would not remain stationary for long periods with the engine running. The vessel movements are a continuous non-impulsive noise source and given the vessel movements are expected to be for short periods of time and the source level is significantly lower than the PTS and TTS thresholds for the assessed species, the predicted impacts during operation are nil.

TABLE 5-6 EXAMPLES OF SUBMISSIONS REGARDING POTENTIAL IMPACTS TO TERRESTRIAL ECOLOGY

Submitter ID	Example Text From Submission
SE-99807707	Residents face strict regulations for even minor works – removing a single native tree requires permits and ecological assessments. In stark contrast, this government project proposes wholesale clearing and soil disturbance, with impacts dismissed as "manageable." This double standard demonstrates a disregard for ecological protections when government projects are involved… …Threatened and endemic species rely on the very sites earmarked for development. For example: • Wedge-tailed Shearwaters, which breed in the North Zone, are highly sensitive to noise, light, vibration, and ground disturbance. • Ground-dwelling and burrowing birds, including the Woodhen, face acute risks from earthworks and heavy equipment. • Marine species associated with lagoon reef ecosystems will be disturbed by reef trimming, piling, propeller wash, and increased vessel activity. • Reptiles, migratory birds, and invertebrates – including several endemic species – will lose habitat or experience fragmentation. Although the EIS claims no threatened flora species were recorded, it concedes that species such as Knicker Nut and Sand Spurge have a moderate likelihood of occurring in the project area. Dismissing their presence based on limited surveys ignores the well-known limitations of point-in-time ecological assessments.

Submitter ID	Example Text From Submission
SE-99677477	Significant vegetation clearance, including 360 tonnes of native vegetation during construction (North + South zones). Major disturbances to habitat through earthworks, drainage changes, increased noise, increased traffic, and heavy machinery… …Given the fragile nature of our ecosystems and the globally significant species we host, the proposed disturbance is unjustifiable.
SE-99617458	Our native vegetarian which is endemic to our island plays a major role in our islands identity.

The Proponent has and will continue to look for opportunities to minimise clearing of native vegetation. The Biodiversity Development Assessment Report (BDAR) that accompanied the EIS was prepared in accordance with relevant guidelines and in consultation with both the DPHI, CPHR and Commonwealth DCCEEW.

The Project may directly impact up to 0.75 ha of native vegetation. This has been minimized throughout the design evolution to date, and future design iterations will seek to further avoid native vegetation. There will be further opportunities to reduce native vegetation clearing and soil disturbance through micro-siting of works, staged clearing, and retention of canopy and understorey, wherever feasible.

Fauna species reliant on ground stability, low-noise environments and intact vegetation cover such as ground-dwelling birds, reptiles and invertebrate's native to LHI as well as migratory birds will be safeguarded by measures outlined in Section 6.2 of the EIS. These include:

- Tree protection measures;
- Pre-clearing surveys;
- Restrictions on works during sensitive periods;
- Controls on artificial lighting and vibration, and
- Protocols for managing heavy machinery in known habitat areas.

A Vegetation Management Plan will be prepared prior to construction to account for these measures as well as maintenance, monitoring and reporting protocols.

TABLE 5-7 EXAMPLES OF SUBMISSIONS REGARDING BIOSECURITY RISK

Submitter ID	Example Text From Submission
SE-97610493	I also acknowledge the ongoing investment in safeguarding the island's environment through bush regeneration, the rodent eradication program, and biosecurity efforts.
SE-98964215	I think that overall the long-term environmental benefits (particularly in biosecurity improvements) will outweigh the short-term impacts of the project's construction.

Submitter ID	Example Text From Submission
SE-99558472	Additonally, a link span jetty that connects the entire open front of the vessel to the island would a increase in potential biosecuity incursion potential. Surely having only the outer side of the hull alongside the jetty is a more practical way to contain the risk of anything crawling, slithering or jumping into Lord Howes interationally recognised precious environnment.
SE-99755970	The existing Trader should be replaced with a vessel which will allow biosecurity to be maintained, with design for small containers that can be lifted by crane so that the biosecurity restrictions may be protected.

Biosecurity has been a key consideration throughout the development of the LHI CIP. The inclusion of a dedicated quarantine facility will enhance biosecurity response and protection for the Island. Adequate kennel and training facilities for biosecurity detection dogs will improve animal welfare and performance outcomes for these important assets in the biosecurity program. This extends to components of the broader LHI CIP that were not assessed for the CSSI/SSI approval – the vessel design and mainland freight forwarding facility. Biosecurity risk will be managed from supplier, to freight staging and forwarding facility, to the vessel, and on-Island. Design elements and procedures put in place at the mainland freight forwarding facility and on the vessel should significantly minimise biosecurity risk to the Island. A comprehensive Biosecurity Risk Management Plan (BRMP) will be developed by the Principal Contractor in collaboration with the Proponent, DAFF and DPIRD. In addition to the BRMP, the LHIB will update existing procedures, or prepare new ones under a comprehensive LHI-specific biosecurity framework.

The new freight vessel has been designed with consideration of design features and technology that will minimise biosecurity risk, e.g., thermal surveillance, containerisation. The vessel–shore interface will be designed to minimise potential pathways for pests, pathogens and other organisms to enter the Island. Physical barriers, inspection arrangements and lighting controls will be applied to ensure the outer hull interface remains managed and secure, with vessel positioning and operational practices not expected to increase incursion risk.

Cargo handling and on-island unloading will be managed to keep freight movements within defined, biosecure pathways between the vessel, unstuffing shed, and quarantine facility (if required). Combined operational and physical measures will ensure biosecurity risk is managed to minimise risk to the Island.

5.3.2 HERITAGE

TABLE 5-8 EXAMPLES OF SUBMISSIONS REGARDING IMPACTS TO THE ISLANDS HERITAGE VALUES

Submitter ID	Example Text From Submission
SE-99688226	The scale and industrial character of the proposed infrastructure will: • Interrupt public enjoyment of the foreshore • Alter the scenic values of a World Heritage coastline • Introduce permanent industrial form into a previously open public space
SE-99334716	As we value our island's natural beauty, a project of this size and impact visually, especially the Northern Zone, will ruin our World Heritage values and the island's natural beauty.

Submitter ID	Example Text From Submission
SE-99807707	Lord Howe Island's World Heritage status represents the highest level of environmental and cultural recognition. Every development decision must prioritise the preservation of the Outstanding Universal Value (OUV) that earned this listing. Yet the EIS treats World Heritage obligations as a procedural formality rather than a guiding principle.
SE-99677477	These impacts are incompatible with the World Heritage protections of Lord Howe Island… …The CIP does not demonstrate clear value for money, nor does it align with the island's sustainability goals, heritage protections, or community values.
SE-99617458	Lord Howe is a beautiful world heritage listed island and any work carried out needs to take this into consideration… …It is acknowledged world wide hence the World Heritage listing.
SE-98889215	Construction and operation would increase marine disturbance, scour, and visual bulk within a World Heritage area.
SE-98422463	The notion of installing dolphin pilings would unquestionably destroy the visual aesthetics of the whole lagoon and goes against our World Heritage values.
SE-98894457	The upgrade should be in keeping with the Island's World Heritage values and designed accordingly.
SE-98592458	Placement of Dolphins to the West of the Jetty. This infrastructure is unwarranted and does not conform to the Island World Heritage values.
SE-99355208	Concern for negative impact upon world heritage values of the island.
SE-99539707	Consultation in regards to the history of working operations on LHI has been ignored, construction on the Lagoon side of Lagoon rd has been historically prevented, the proposal of 6.5 m high sheds is quite frankly insulting and plays against world heritage and environmental aspects… …Have you forgotten how and why people love Lord Howe? I guess not, because these concepts are not designed for Lord Howe, they are designed for government bodies with no personal or historical association to Lord Howe and it's unusual working conditions.

Visual bulk, structural height and industrial character have and will continue to be moderated through siting, integration, and material and colour selections that reduce contrast with the existing character and natural landscape of LHI and has been further considered in the updated Urban Design Report.

Construction works in the North Zone will be planned and implemented to limit impacts to public enjoyment of the foreshore where practicable. The placement and scale of elements such as sheds and service structures will be managed so that they do not dominate key sightlines or alter the Island's characteristic open coastal setting.

The installation of mooring dolphins is necessary to facilitate safe berthing, vessel operation and mooring of the new marine vessel; however, mooring dolphins will be designed to avoid or minimise unnecessary visual prominence, minimise navigational clutter and maintain the aesthetics of the lagoon. A tripod design is currently proposed to minimise seabed disturbance while maintaining function. The number and final design specification of the mooring dolphins will progress during detailed design and to be based on the final mooring analysis by Serco Australia, the ship builder.

Construction and operational activities will be undertaken with controls that limit marine disturbance, scour and visual contrast, ensuring that changes to the lagoon and foreshore environment do not erode the areas long-term heritage character. Future design development by the Principal Contractor along with the Project Architect and Landscape Architect will be guided by the need to align with the Island's heritage values, local context and community expectations for a landscape appropriate for LHI.

5.3.3 VISUAL

TABLE 5-9 EXAMPLES OF SUBMISSIONS REGARDING THE PROJECTS VISUAL AMENITY

Submitter ID	Example Text From Submission
SE-99688226	Request: That the Department require updated visual impact assessment outputs, including height, scale, materiality, and screening options, and demonstration of how scenic and heritage values will be preserved.
SE-99334716	As we value our island's natural beauty, a project of this size and impact visually, especially the Northern Zone, will ruin our World Heritage values and the island's natural beauty.
SE-99051974	Waste Management a. move the most northerly Storage Shed to the Bulky Goods storage area, or anywhere else, to reduce visual impact, and to allow for future expansion if required to the North, possibly due to increased waste compliance rules in the future b. The entire length of the facility must be fully shielded from the lagoon. c. Area along southern length of air strip – this is currently one of the untidiest areas on the island and needs to include some kind of visual shielding from Lagoon Road.
SE-99557208	Dolphin Pylons x 4 or 5 These things will be massive and a blight on the landscape and of cause will include lights that flash all night long.
SE-99652460	I do not have objections to this waste management facility I just hope all efforts will be made to minimise the visual & sound impacts of both the WMF & the new dog kennels on the surrounding neighbours… …The berthing dolphin piles should also be kept at the minimum required, if any at all. The plans & pictures are misleading as to the true size & number of the piles proposed and I feel the community will be shocked by the visual impact of them and the distance the proposed piles jut out into the Lagoon.
SE-99560721	Not to mention the asthethics of the jetty which is an iconic view and area for Lord Howe Island with pillars and more structure in sight. I would also like to highlight that the big machinery could be stored at the waste management facility instead of the jetty - helping to make the new building much smaller and less of an eye sore.
SE-98541708	The computer simulated "fly through" up the jetty and into the "unstuffing shed" is not the view that most residents and tourists will see. Rather, they will see views of the facility either walking/riding/driving northwards from Signal Point or southwards from Old Settlement Beach. It is impossible to gain a clear picture of the size and impact of the "unstuffing shed" from these angles via the simulation provided. What would be very helpful would be a real model of the wharf area and unstuffing shed which could be viewed from any angle. From this it would be far easier to see if the proposed placement of the building on the site was optimal, or whether it could be better located so as to be less intrusive on the site – from ALL angles including the roads.

Submitter ID	Example Text From Submission
SE-99617458	The addition of the container loading equipment and storage area presents a major intrusion and the vast area of paved open space only adds to the eyesore.
SE-98889215	The proposed unstuffing shed and external storage hardstand may not physically fit within the constrained precinct and could affect visual amenity and access… …The EIS should demonstrate that the spatial, traffic, and aesthetic impacts of container handling have been accurately assessed and that operational efficiency gains are real, not assumed.
SE-98422463	The notion of installing dolphin pilings would unquestionably destroy the visual aesthetics of the whole lagoon and goes against our World Heritage values.
SE-99539707	For the past 30 years the LHI Board has been "taking" back the foreshore with excessive planting out of some spectacular viewing points, now they want us to stomach an excessive development on the foreshore in one of the most open and exposed sites.
SE-99355208	Concern for the unstuffing shed being so close to the road and an eye sore.
SE-99564724	Turning the jetty and boat ramp area into a large, manufactured precinct with viewing platforms and picnic zones is not an improvement – it's an intrusion. Islanders love being able to walk around the rocks, move freely between the boat ramp and the jetty, and watch the sunset without barriers or built structures taking over the foreshore.
SE-97971472	The unloading area at the jetty needs to be reassessed to have minimal impact on the natural beauty of the area… … Vehicle storage when not used for unloading could be facilitated on the old nursery site well out of public view.

The updated Urban Design Report (**Appendix D**) includes measures to minimise visual amenity impacts. Outcomes will be managed through placement, scale control, material selection and screening treatments that reduce visual bulk and maintain the character of the foreshore. Structures in the North Zone will be sited with consideration of key public viewpoints, road approaches and the prominence of the freight handling facility, such that it does not dominate open coastal views nor detract from the area's scenic qualities. Relocation or consolidation of elements such as storage sheds, container-handling areas and machinery parking will reduce impacts from visually exposed infrastructure. Screening and vegetation buffers will be applied along sensitive interfaces including the lagoon edge and Lagoon Road corridor to further minimise impacts.

Marine structures will be designed to minimise visual intrusion into the lagoon. The size, number and placement of mooring dolphins and pylons will be kept to the minimal requirement to meet safety obligations and NSW Maritime legislation and regulations, minimise unnecessary prominence and night-time glare. Lighting of marine infrastructure will be controlled to maintain the Islands dark-sky attributes and minimise impacts to light-sensitive marine and avian fauna. The relationship between built form and natural landforms will be managed to avoid an industrial appearance within the open-shoreline setting.

Operational areas not required to be visible such as the waste management components, equipment storage and vehicle holding areas will be positioned away from key viewpoints. Siting, screening and mass- reduction measures, as recommended in the updated Urban Design Report, will be implemented to ensure the visual and landscape character of the foreshore is not adversely affected.

TABLE 5-10 EXAMPLES OF SUBMISSIONS REGARDING THE BUILT FORM OF THE PROJECT

Submitter ID	Example Text From Submission
SE-99688226	The scale and industrial character of the proposed infrastructure will: • Interrupt public enjoyment of the foreshore • Alter the scenic values of a World Heritage coastline • Introduce permanent industrial form into a previously open public space
SE-99334716	The 'Unstuffing Shed' in the Northern Zone would be better if the roofline was in keeping with the other existing sheds already in place and ideally moved to be in line with the existing Marine and Cargo sheds. This would lesson the impact of buildings in the area.
SE-99051974	Unstuffing building a. Move the quarantine and post rooms to opposite end of building, with the post room access from within the building b. Then, add an additional opening on the southern end of the building, this will greatly improve the flow of forklifts and increase safety in the area. c. Have a single flat roof for the whole building, with the slope of the roof in the direction of the slope of Lagoon Road.
SE-99557208	I feel that the jetty shed area will be an up grade to the present arrangement, and make unloading the ship a little bit easier. However the Un-stuffing shed is far too high. I think 6m is way too much for what is needed. 4m would be plenty of height. Also I feel that the roof line should be a standard type roof to make the buildings roof line look the same as the other buildings on site.
SE-99652460	The planned unstuffing biosecurity shed design is not sympathetic to the surrounding buildings & area. All the other buildings have gable, old fashioned type of roofs, the new shed has a modern looking style. Why can it not be of a style similar to the other sheds? Does it really need to be so high as well? Can the angle of the roof be changed to not have as much visual impact? Does it really need those high windows? If it is just for light then install skylights or alsonite sections for light. Can the footprint of the building be reduced any further? …The colours proposed are similar to the colours of the existing jetty sheds but in the last 5 years the Board painted the other public buildings on the Island in the pale dove grey with white trim. These colours are more sympathetic to the Island surrounds than the older colours. Would they be considered? Especially if the Marine Rescue shed is remaining in the charcoal palette.

Submitter ID	Example Text From Submission
SE-98541708	Strangely, although the above synopsis mentions "scale, materials and placement" as factors of complementarity, it fails to mention appearance. However, the "sharkfin" profile of the roof on the "Unstuffing Shed" is unlike the roof profile of any other public building on Lord Howe. In particular, the existing cluster of buildings at Wilson's Landing are all "gable-ended" structures. If the "unstuffing Shed" was gable ended, the building would (a) look far more like the other buildings at Wilson's Landing and other public buildings on Lord Howe and (b) could have a lower profile than the "sharkfin" roof - thus appearing less bulky from Lagoon Road – the direction from which most people would see it. Although the "sharkfin" concept provides good natural lighting inside the building, this could be equally achieved by skylights in a gabled roof.
SE-97029957	The height of the new shed and design are excessive and should be revised to meet the design size and heights of similar buildings in the area

Built-form outcomes will be guided by the updated Urban Design Report (**Appendix D**) which provides direction on massing, placement, height, roof form and colour treatment to ensure new structures integrate with the foreshore context. The detailed design will determine the final building volume, roof profile and façade treatments with an emphasis on moderating the perceived bulk from Lagoon Road, Signal Point and other key public viewpoints. Roof form and height will be aligned with the character of existing buildings, noting opportunities identified in submissions to use gable-ended silhouettes, reduce height where operationally feasible for safe cargo handling, and employ roof orientations that follow the natural landform.

Functional adjustments for the unstuffing shed building such as internal room arrangement, alternative openings and circulation improvements will be considered where compatible with operational, biosecurity and structural requirements as part of the detailed design phase. Colour palettes will be selected to complement both the existing jetty, heritage listed sheds, meet the requirements of NSW Heritage guidelines and more contemporary public-building tones on the island to facilitate a cohesive expression across the precinct.

Both the marine and land-based structures will be designed to minimise industrial character and avoid introducing unnecessary bulk or visual clutter into public spaces. The placement and number of mooring dolphins, pylons and ancillary equipment will be kept to the minimum require for operational safety and are not anticipated to dominate the lagoon frontage or interrupt foreshore enjoyment. Opportunities to reposition ancillary structures such as machinery storage, container-handling equipment and waste management elements will be considered to keep visually intensive functions away from primary public sightlines, where practical. Integration of screening, vegetation and consistent architectural language will be applied to reduce contrast and ensure the built form across the precinct reflects the character principles set out in the updated Urban Design Report.

5.3.4 TRAFFIC

TABLE 5-11 EXAMPLES OF SUBMISSIONS REGARDING THE ACCESS

Submitter ID	Example Text From Submission
SE-99688226	As someone with experience in lagoon management, I am concerned that: • Sediment resuspension will degrade water clarity • Thruster use will disturb benthic ecosystems • Lagoonal habitat and biodiversity will be at risk • Access for service and tourism vessels will be constrained
SE-99558472	Furthermore, this suggested plan would greatly impact the usage of the jetty and docking space for other vessels which should be considered too as the jetty is a hub for commercial, visiting and local vessels.
SE-99051974	Unstuffing building a. Move the quarantine and post rooms to opposite end of building, with the post room access from within the building b. Then, add an additional opening on the southern end of the building, this will greatly improve the flow of forklifts and increase safety in the area… … Also, the trees directly in front of the fuel may restrict some large vehicles form accessing the fuel.
SE-99557208	Having a road to access the boat ramp to the north of the Un-stuffing shed is totally unnecessary. We can all work together here, so if someone needs to put their boat in or out of the water they can still do so by driving through the normal way. Don't block access just because the ship is in never has never will… …The ramp is at least 40m long, the jetty is just over 50m so this means when there is no ship at the jetty, only one local boat will be able to use the jetty at a time. We do get other boats including yachts that use the jetty, this proposed ramp will stuff it up for them as well…. …I run a tourist boat on the Island and to manoeuvre a boat around the jetty now has its challenges to add more objects to navigate around will make it harder and potential un-safe.
SE-97029957	The proposal blocks public and pedestrian access to the jetty during ship operations, which is unacceptable - a safe access walkway and waiting area is essential! …Commercial vessel operations require proper planning and inclusion, with relocation to the north side for wash-down access at allow equitable access at all times and not to be excluded during ship operations… …Marine Parks vessels should be removed from permanent vessel parking in the area! This is not required and places further pressure on the area. They should meet same requirements as all other operators… …Zone 1 is not a safe and practical area to store vessels and trailers and better design or zones 2 and 3 is required to include the zone one overflow into this area
SE-99560721	Finally, it is important to consider the effect this change could have on the jetty's availability. The existing jetty is used by a range of vessels – commercial operators, visiting yachts, and local boats. A RoRo operation could significantly reduce flexibility and access for these essential users.

Submitter ID	Example Text From Submission
SE-99652460	The proposed new piled vessel ramp & associated dolphin berthing pylons effectively make the jetty into a 1 side use only for the local boat operators and other visiting vessels. All should be done to ensure that the ramp (if it goes ahead) is also made to be multi function so the local vessels can use it in some manner, dock beside it, whatever when needed. Frequently there are 2 or 3 local vessels using the jetty over the busy season at the same time. This ramp & piles will stop us from doing so.
SE-98889215	The proposed dolphins will permanently alter lagoon character and restrict access for other wharf users, including rescue and research vessels… …The proposed unstuffing shed and external storage hardstand may not physically fit within the constrained precinct and could affect visual amenity and access.
SE-98422463	The notion of installing dolphin pilings…would also create a major water traffic hazard
SE-99355208	The structure is such, that the existing jetty would be subject to the ramp and no other vessel could use the existing jetty. You can see the ship sits at the end of the jetty and new infrastructure that sits on the southern side of the existing jetty will prevent other vessels from accessing the existing jetty.
SE-97971472	The construction of the ramp will impede the use of the south side of the wharf.
SE-99523458	From an environmental perspective, a practical workable vessel with correct unloading facilities perspective or from a safety perspective (as evident with the pedestrian areas and viewing areas). This is a work environment, not somewhere that pedestrians should be anywhere near!
SE-98848472	The shipping area will not suit the island conditions

Traffic and vessel access arrangements will be managed to ensure coexistence between freight operations, local boats, visiting vessels and tourism operators, while maintaining safety requirements. Circulation paths for forklifts, service vehicles and pedestrians will be defined during detailed design. These measures will maintain separation and reduce conflicts including controlled access during freight unloading. The location and configuration of the unstuffing shed building will support efficient internal movement while reducing external congestion. Landscaping, road furniture and turning clearances will be accounted for to ensure large-vehicle access is maintained.

The detailed design of the fixed piled vessel ramp, berthing structures and mooring dolphins will balance safe manoeuvring, berthing and the use of the jetty outside of freight operations.

Operational layouts for the jetty precinct will be configured to preserve multi-user access and avoid unnecessary restrictions for residents, visiting yachts and tourism vessels. Parking, trailer storage and vessel-holding areas will be located to maintain safe use and avoid interaction with constrained waterfront areas, including options to relocate overflow trailer storage to other areas.

Public access and pedestrian safety will be protected through delineated waiting zones, designated walkways and clear separation from machinery and loading operations, noting that the precinct functions primarily as a working wharf. The arrangement of marine structures, access roads and circulation spaces will be designed so that the jetty is not anticipated to become single-use or limited to one-sided berthing, and to ensure that local vessels retain practical, safe and reliable access to the foreshore.

TABLE 5-12 EXAMPLE OF SUBMISSIONS REGARDING MARITIME SAFETY

Submitter ID	Example Text From Submission
SE-99051974	Roll on, Roll off is a great concept, but requiring forklifts to lift 7 ton, on a moving ramp (yes, we actually get waves and wind) is dangerous.
SE-99557208	The Tasman Sea is one of the worst bits of ocean besides the southern ocean in the world. Containers on deck stacked up 3 high, they will end up over the side in the first good gale they run into… …I noticed in the EIS that RoRo will only be carried out if conditions are fair. Can you imagine a forklift going down a moving ramp onto a stationary ramp with a 7 ton load on, NO WAY.
SE-99652460	The berthing dolphin piles… will also affect the manoeuvring of our own vessels when we use the jetty.
SE-99558472	I have spent many years working alongside offloading the Island Trader, and I can attest to the large, ungainly and unpredictable shunting and movement off the vessel on a king high tide – and the biggest tides of the month are generally necessary for large vessels to enter the lagoon. It doesn't need a large swell or strong wind for the trader to be moving many meters over swell surges at high tide, and it must be said that Gale force winds are frequent over the better part of the year. So when we ineveitably get 30 knot gusts on the same day a 6 meter south westerly swell, the proposed idea of a large forklift carrying multi tonne containers driving on a bucking link span jetty is concerning.
SE-98422463	The proposed container shipping design is utterly inappropriate and would inadequately cope with handling the sea conditions on the Island, making unloading extremely difficult, if not impossible at times.
SE-99564724	The proposal to upgrade to a roll-on roll-off ship is equally concerning. The idea may look sensible on paper, but our realities are different. Our tides, swell, and landing conditions are unpredictable, and a vessel of that type could pose greater danger, not less.

Maritime safety measures will be centred on ensuring that vessel movements, ramp conditions and load-handling activities can be carried out safely. Operational thresholds for swell, tide and wind will be defined to ensure that manoeuvring, berthing and cargo transfer are not undertaken in conditions that increase safety risk. Equipment such as forklifts, load-restraint systems and ramp interfaces will be operated within parameters that account for vessel movement, surge and tidal variation, with procedures that prevent heavy-load transfers during unsuitable conditions.

Detailed design of freight handling will ensure that ramp gradients, deck movement and vessel motion are managed to support controlled, predictable load transfer. Cargo handling methods will be adapted to avoid situations where heavy machinery would be required to operate on unstable or moving surfaces, and alternative transfer approaches will be available when weather conditions are not expected to accommodate ramp-based operations. Vessel-handling practices, towage or line-handling arrangements and berthing procedures will be configured to manage surge, high tides and frequent strong winds that are characteristic for the Island. These operational and structural controls will be implemented to ensure that freight transfer and vessel-movement safety are not compromised.

TABLE 5-13 EXAMPLE OF SUBMISSIONS REGARDING TRAFFIC IMPACTS ON-ISLAND

Submitter ID	Example Text From Submission
SE-99051974	Fuel bowser and tank area – remove all feature tree planting – this is high traffic area and with the fuel bowser, will increase traffic. Clear sightlines are essential for cyclists, vehicles and pedestrians alike.
SE-98816236	Ive attached a drawing from the proposed plan highlighting an area I believe should be opened up as part of the driveway into the unloading area. Otherwise it will be a bottleneck for trucks and forklifts entering and exiting. It will also create a blind spot for traffic heading south along the Lagoon Road.
SE-98422463	Positioning the main fuel depot at the Southern end of the Island is also totally ridiculous! This would create and unseemly amount of road traffic across the length of the Island due to the main settlement zone being at the far Northern end of the Island. The South end has always been quieter and less populated and trafficked, which I believe is how it should remain. Positioning the fuel depot a long distance from the main settlement area is completely absurd as it would result in residents having to travel further and burn more fuel, which is exactly what should be avoided.
SE-99523458	The heavy equipment, larger trucks, heavy duty forklifts etc that are expected to operate this new vessel, ramp etc will be dangerous and destroy our roads.

The introduction of heavy equipment, large trucks and high-capacity forklifts will be managed through defined routes and restricted operating areas and other measures to be detailed in the Construction Traffic Management Plan as part of the CEMP. Traffic volumes associated with fuel access, freight transfer and equipment movements will be directed to minimise disruption to quieter residential zones and to maintain safety where mixed-use road conditions occur. Measures such as temporary stopping bays, speed controls, and clear sightlines will be implemented to ensure that on-island construction traffic associated with the Project does not create unsafe conditions or unreasonable impacts on local road users including pedestrians, cyclists and wildlife.

5.3.5 SOCIAL

TABLE 5-14 EXAMPLE OF SUBMISSIONS REGARDING THE ISLAND'S SOCIAL CHARACTER

Submitter ID	Example Text From Submission
SE-99557208	The Island Trader has been servicing the Island for 30 years approx and she has been almost perfect. We do need a new ship as she is getting too old. Build a ship just like her… …We are the ones who live, work, breath and love the place. It's our home.
SE-99688226	Lord Howe Island's shipping system must ensure reliable freight, without sacrificing cultural character, tourism values, or ecological integrity. The EIS currently proposes a design that imposes external assumptions and methods, rather than adapting to this unique environment.
SE-99755970	The simplicity of the Island, its projection of peace and beauty, makes it sought after by visitors and by those who live there.

Submitter ID	Example Text From Submission
SE-99564724	The proposed new developments for the critical infrastructure project feel completely out of step with what Lord Howe Island is, what it means to its people, and what gives it its irreplaceable character. These plans don't reflect our values or our lived understanding of this place. They risk erasing the very things that make the island special. What we need is to maintain attention on preserving what is already here… …In the end, the island doesn't need to be changed into something it isn't. It needs to be respected for what it already is. The community is asking for thoughtful stewardship, not transformation. We need to protect the place we call home by using what we have, maintaining what works, and preserving the soul of Lord Howe Island for generations to come.
SE-98889215	The proposed infrastructure will change the working character of the wharf, the appearance of the lagoon, and the rhythm of community life. If the system proves incompatible, those impacts will be permanent.
SE-99539707	We do not need bays for boat trailers, people of Lord Howe have made things happen in a discreet manner. Bays are for commercial and mainland cites. Have you forgotten how and why people love Lord Howe? I guess not, because these concepts are not designed for Lord Howe, they are designed for government bodies with no personal or historical association to Lord Howe and it's unusual working conditions.
SE-99617458	Again it is important that any new infrastructure blend in without destroying the islands identity… …We acknowledge that things can be made better but Lord Howe prides itself on its uniqueness and its old world charm. We do not want this to be destroyed.
SE-99677477	While residents support genuine improvements to waste management, freight, and biosecurity, the current proposal is excessive, environmentally risky, and poorly aligned with the scale and character of our Island… … Residents repeatedly raised concerns about… Loss of character and sense of place… …The current proposal does not protect Lord Howe Island – it risks fundamentally changing it.

Social outcomes will be managed by ensuring that freight and infrastructure upgrades respect the Island's character, scale and community identity. The form and operation of new facilities will be shaped to maintain the existing aesthetic and working rhythms that residents value, while supporting reliable freight services essential to daily life. Infrastructure elements that support community life such as access to the foreshore, the informal character of the jetty precinct and the understated built form of public facilities will be retained where practicable, so the Island's familiar patterns of use are not disrupted.

Community values relating to heritage, identity, lifestyle and long-term stewardship will be reflected in design and operational considerations to ensure that infrastructure improvements do not alter the Island's essential character. The introduction of new facilities will be balanced against the need to preserve local traditions of working, boating, gathering and moving through the foreshore without an overly formal or urban environment. Measures to keep built form modest, maintain landscape integration and avoid imposing mainland-style solutions will be applied so that the upgraded precinct is not anticipated to diminish the qualities residents associate with home. The overall approach will be guided by ongoing engagement to foster the Island's unique sense of place while ensuring essential services continue to support the community for future generations.

TABLE 5-15 EXAMPLE OF SUBMISSIONS REGARDING POTENTIAL IMPACTS TO TOURISM

Submitter ID	Example Text From Submission
SE-99688226	The proposed works will require public exclusion from the jetty and adjoining foreshore for 1–2 days during each unloading cycle. This will meaningfully disrupt: • Tourism experience and reputation • Visitor access to key water entry points • Cultural and recreational activities • Businesses operating in the vicinity Importantly, the current system does not require this level of closure.
SE-99808708	I would also be interested in the Board providing a detailed timeline of The North and South Project as well as the new vessel that is supposedly being purpose built; to assess the impact our businesses will face during this time as these works will have obvious impact on tourism while they are being carried out

Tourism access and visitor experience will be managed by ensuring that restricted access to the jetty and foreshore during freight unloading is controlled, clearly communicated and limited to the minimum area required for safety. Pedestrian access, water-entry points and areas used for recreational activities will be available outside the operating zone so that disruption to visitors does not affect the foreshore experience. Businesses that rely on the jetty precinct will be supported through defined access windows, operational scheduling and early communication of temporary changes. The freight function of the precinct will be balanced with its tourism role so that safety requirements do not unnecessarily restrict enjoyment of the foreshore.

Construction staging and vessel-transition timeframes will be coordinated to minimise impacts on tourism operations such as via advanced communication of indicative timing for works in the North Zone and South Zone. Access for operators, visitors and tour vessels will be maintained where practicable through delineated work zones, managed traffic flows and safe pedestrian diversion routes.

TABLE 5-16 EXAMPLE OF SUBMISSIONS REGARDING THE COST OF THE PROJECT

Submitter ID	Example Text From Submission
SE-99828487	The larger vessel, expanded loading location, and new logistics footprint will consume more fuel, require more maintenance, and cost more to run. These costs will be: • passed through directly to island residents and businesses • absorbed by a small community already paying top-tier freight prices • compounded over decades if not designed for efficiency now
SE-99334716	The proposed size of this project is going to leave this small community with ongoing maintenance costs resulting in a much higher cost of living for us all.
SE-98630228	Freight costs are a critical issue for all Islanders and a lack of confidence in the financial projections need to be addressed.

Submitter ID	Example Text From Submission
SE-99808708	A breakdown of costs, the community need to feel secure in the amount of money being spent, should costs blow out there needs to be safety nets to prevent the costs being passed on to the householders in figures they cannot afford. These improvements are meant to ease the burdens the community currently feel due to our never-ending hikes to shipping costs, breakdowns of our current WMF but I do not see how that is possible with the current proposal.
SE-99355208	The approximate cost of $30 million is going to cost the community a lot of money and the government too. Concern of cost being fed back to the community through higher freight and waste charges in the future.
SE-98894457	I am concerned that the proposed vessel and infrastructure for the North Precinct Project will result in prohibitive freight costs for the island and is unsuitable for future needs of residents and businesses operators.

Cost impacts will be managed by ensuring that vessel design, loading arrangements and logistics layouts operate efficiently and do not introduce unnecessary long-term expenditure for the community. Fuel use, maintenance demands and operational inputs will be considered in selecting equipment and determining layout so that local costs do not escalate beyond what is required for safe and reliable freight delivery. Any rationalisation of the logistics footprint will be directed toward reducing operational complexity and avoiding costs that would place disproportionate pressure on residents and businesses. Freight-related decisions will be informed by the need to maintain affordability for a small population already sensitive to changes in shipping charges. The marine freight service operation and maintenance will be tendered regularly by the NSW Government, to ensure competitive pricing is received by the market, with competition into the future for "value for money" on the freight service to LHI.

Financial transparency will be supported by communication on capital investment, operational parameters and the long-term management framework for the upgraded facilities. Measures that limit on-costs such as efficiency in handling, appropriate sizing of equipment and maintenance planning will be embedded so that future freight pricing does not increase because of the infrastructure. The approach will maintain a reliable, sustainable freight system that supports community well-being without creating an ongoing financial burden for residents and businesses.

TABLE 5-17 EXAMPLE OF SUBMISSIONS REGARDING THE PROJECT WORKFORCE

Submitter ID	Example Text From Submission
SE-99688226	• The risk assessment appears to apply standard NSW Government risk profiles, which assume high infrastructure capacity, redundancy, and workforce flexibility • Such assumptions do not translate to Lord Howe Island’s remote setting, ecological sensitivity, limited land area, or its critical dependence on a single supply line • Risk on Lord Howe needs a bespoke approach, matching context rather than imposing mainland standards
SE-99828487	Currently, we have flexibility built into our freight operations. We can: • use cranes from the existing jetty • adapt to equipment breakdowns • manage with the skills and workforce available • shift loads around when weather or tides change

Submitter ID	Example Text From Submission
	Under the new model: • everything depends on one ramp and one vessel • no backup unloading method would remain, as container weights exceed the limits of the existing wharf • specialised machinery and certified operators would be required • Lord Howe does not have the accommodation or workforce to support such specialised roles • it is unclear how equipment failures would be managed or how the system would continue if the ramp were damaged
SE-98889215	The vessel, its handling methods and on-shore operations have been progressively refined to match the Island's tidal windows, lagoon depth, weather exposure, and small workforce… …Lord Howe's workforce is limited, ageing, and already stretched across essential services. Accommodation shortages prevent additional personnel from relocating to operate complex new machinery… …The Island's workforce is finite, ageing, and already stretched. Accommodation shortages prevent recruiting additional staff. The proposed model demands technical skills and maintenance support unavailable locally. The EIS should include a realistic workforce and training plan showing how the new system could operate sustainably using the existing community.

Workforce planning will be tailored to the Island's scale, remote setting and accommodation capacity, ensuring operational demands align with the skills and personnel available. Freight operations, vessel-handling tasks and on-shore activities will be structured to rely on processes that can be supported by the existing workforce, and future trained local workforce avoiding unnecessary dependence on specialised roles that cannot be provided locally. Where new competencies are required, training, certification and operational requirements will be structured such that workloads do not exceed community capacity. Equipment selection and redundancy will be aligned with the limitations of the Islands workforce and will be managed to minimise specialist support.

Operational resilience will be maintained by ensuring essential freight functions do not rely on a single function, and by processes minimise impacts from equipment faults, ramp issues or weather disruptions. Load-handling systems, maintenance requirements and support will be planned so equipment failures do not halt operations or require staff that are not available on the Island. The integration of vessel, ramp and on-shore processes will be configured to match tidal windows, lagoon conditions and workforce availability to ensure that freight continuity is suited to the Island. Business continuity plans will be developed with the operator.

5.3.6 NOISE

TABLE 5-18 EXAMPLE OF SUBMISSIONS REGARDING NOISE IMPACTS FROM THE PROJECT

Submitter ID	Example Text From Submission
SE-97029957	The added deck to the jetty shed could be misused by the "radio shack" and must meet BCA and community noise standards
SE-99652460	I do not have objections to this waste management facility I just hope all efforts will be made to minimise the visual & sound impacts of both the WMF & the new dog kennels on the surrounding neighbours.

Operational noise from the Project was assessed to be compliant at the nearest sensitive receivers (see Section 6.17.2.3 of the EIS).

The deck added to the Old Cargo Shed has been designed to facilitate pedestrian access to the existing jetty, and its built form will reflect its heritage significance. Potential noise from operation of the "radio shack" is not a direct result of the Project.

5.3.7 WASTE

TABLE 5-19 EXAMPLE OF SUBMISSIONS REGARDING WASTE SERVICES

Submitter ID	Example Text From Submission
SE-99652460	The WMF should also do all possible to turn green waste/compostable waste into a product that the Island can use in gardens and reveg sites. It should not be shipped off if it can be used here.
SE-99557208	One thing that I feel is wrong is the compost that comes out of there to be shipped back to Port Macquarie. I for one would use any composed generated in my garden, don't waste gold. Any food scraps make perfect garden food, fertiliser is expensive to import with freight cost so lets use what we have.
SE-99677477	The CIP version of the WMF appears over-engineered, over-costed, and disconnected from the island's actual waste volumes.

The new WMF will comply with EPA guidelines and will be sited largely within the footprint of the existing facility. The new WMF has been designed to accept waste volumes that consider peak tourist periods, including redundancies that will future-proof the facility. The new WMF does not include compost processing for reuse on the Island as it would not be possible to meet EPA requirements for compost being provided to the public.

TABLE 5-20 EXAMPLE OF SUBMISSIONS REGARDING THE POLLUTION

Submitter ID	Example Text From Submission
SE-97029957	Bunding is required on the new ramp to the jetty to avoid a spill
SE-99558472	When a spill happens the environmental, financial, community and news cycle impact would be considerable.
SE-99677477	Construction and operation will dramatically increase diesel use, with 1.59 million litres of diesel estimated to be burned during construction alone.

Pollution prevention measures will be incorporated into the construction and operation of the new fixed piled vessel ramp and unloading areas. Bunds, drainage and emergency response procedures will be included, where necessary, to contain spills and prevent contaminants entering the lagoon. Fuel-handling, machinery operation and vessel-interface procedures will be managed to ensure that accidental spills do not lead to uncontrolled environmental exposure.

Energy use and emissions associated with construction and operation will be monitored to ensure diesel consumption and associated environmental impacts are understood and minimised. Construction staging, equipment selection and operational planning will be designed to avoid unnecessary fuel use with efficiencies incorporated where feasible.

5.4 JUSTIFICATION AND EVALUATION

TABLE 5-21 EXAMPLE OF SUBMISSIONS REGARDING THE SCALE OF THE INFRASTRUCTURE ASSOCAITED WITH THE PROJECT

Submitter ID	Example Text From Submission
SE-99828487	The new vessel appears to be designed primarily to accommodate containers, but now includes a sheltered area, suggesting containerisation alone is not suitable for the island's needs. This indicates the design is becoming a compromise: • it is bigger and more complex than necessary • it combines container and break bulk approaches without excelling at either • it appears driven by container handling rather than being designed around Lord Howe Island
SE-99688226	The scale and industrial character of the proposed infrastructure will: • Interrupt public enjoyment of the foreshore • Alter the scenic values of a World Heritage coastline • Introduce permanent industrial form into a previously open public space
SE-99755970	The design of a RORO vessel necessitates an industrialisation of the jetty area.
SE-98889215	There is no reason Lord Howe cannot achieve a high-grade, compliant standard without major structural change… … Without verified metrics, "efficiency" cannot be accepted as justification for major environmental change.
SE-98894457	I acknowledge the current area is unsafe and is in need of a major upgrade. The upgrade should be in keeping with the Island's World Heritage values and designed accordingly.
SE-99564724	What we need is to maintain attention on preserving what is already here. We don't need a suite of new buildings or oversized upgrades. The charm of Lord Howe lies in its simplicity – its authenticity – the feeling that you are away from the big city and its large, disconnected developments. That quality is not something you can rebuild once it's lost.
SE-98422463	It would seem that the whole premises of the Plan revolves around promoting biosecurity and the design has been done in a way that prioritises this above all else and fails to take into consideration, let alone achieve, the main objective, which is to provide the community with a long-term, sustainable shipping service.
SE-99677477	While residents support genuine improvements to waste management, freight, and biosecurity, the current proposal is excessive, environmentally risky, and poorly aligned with the scale and character of our Island. It prioritises infrastructure expansion over environmental protection, community needs, and financial responsibility.
SE-99539707	We do not need bays for boat trailers, people of Lord Howe have made things happen in a discreet manner. Bays are for commercial and mainland cites.
SE-99807707	The EIS frames upgrades as essential for protecting World Heritage values through enhanced biosecurity, while the project itself directly damages those same values – removing vegetation, disrupting fauna habitat, altering landforms, and industrialising the visual setting of one of Australia's most iconic protected places.

Submitter ID	Example Text From Submission
SE-99638714	The existing methods have proved to be workable and successful since the inception of the vessel Island Trader some 34 years ago. They do not need changing but need some evaluation and upgrading.

Infrastructure scale is aligned with the Island's critical need for more reliable freight operations and provide an EPA-compliant WMF. The marine infrastructure design will provide robust freight capabilities to meet foreseeable demand, redundancy and compliance. Built elements will be moderated in height, footprint and appearance so the upgrade delivers the required performance and durability without introducing unnecessary industrial character or loss of foreshore amenity. Structural changes will be limited to functions that enhance safety, biosecurity and efficiency, ensuring the investment remains sustainable over its lifecycle.

The infrastructure will be designed to protect the Island's sense of place while accommodating practical growth in freight tasks and operational complexity over time. Where additional capacity is required, it will be provided through scalable layouts, adaptable equipment zones and staged implementation to not overwhelm the unique setting of the Island.

TABLE 5-22 EXAMPLE OF SUBMISSIONS REGARDING THE ALTERNATIVES CONSIDERED

Submitter ID	Example Text From Submission
SE-99558472	My undertanding is that RoRo vessel design is favoured for porpurted safety benefits. If you look at worker's accident history on Lord Howe unloading, it seems most incidents come from fork lifts. The forks necessary for proposed new vessel must be of larger and more powerful size, as it appears that new freight boxes will be heavier/larger. I would think that if RoRo was a favoured method from reduction to workers exposure to risk, then you need to consider that with RoRo it will likely necesiistate more powerful, larger fork lifts, the more commmon cause of safety incidents.
SE-99652460	I feel the ramp & dolphin piles are being built just to suit the RORO style ship. If the successful tenderer for the ship build says another style of ship is more suitable then the proposed ramp & piles might not be necessary, is it all going to change again? If the current style of ship works successfully then why not stick to what works.
SE-99557208	RoRo (roll on roll off) may be the way ships are going but these are massive ships that carry cars etc. Even the new ship that was built to service Macquarie island and Antarctic has a crane… …I can understand the idea of all the goods for the ship stacked in rodent proof containers. This won't change with a LoLo (lift on lift of) ship. Pack the containers and lift them into the hold. Then lift them back out at LHI. Simple… …Unfortunately this almost sounds like a threat. ...."If a new vessel ramp is not provided, it will not be possible to replace the MV Island Trader with a contemporary type of vessel being procured by the NSW Government"..... Really !!
SE-99688226	Despite the EIS presenting containerisation and roll-on/roll-off (Ro-Ro) as "more efficient," these claims are unproven under Lord Howe Island conditions… …evaluate a modern Lo-Lo vessel alternative with biosecurity integration, including its resilience advantages, equipment compatibility, and spatial efficiency.

Submitter ID	Example Text From Submission
SE-99828487	Our current freight method is reliable, functional, and specifically adapted to Lord Howe's tidal, spatial, and workforce realities. It has been proven through decades of real-world operation… …There is no problem with the method itself. The only issue is that the current vessel has reached the end of its operational life. We simply require a replacement vessel that maintains the proven flexibility and suitability of the existing operation.
SE-99755970	If it is to be RORO then it will be the only such vessel in Australia and the structure supporting this vessel will be of necessity, specialised, complicated and extremely expensive… …The existing Trader should be replaced with a vessel which will allow biosecurity to be maintained, with design for small containers that can be lifted by crane so that the biosecurity restrictions may be protected. Has there been any search and enquiry for a suitable vessel anywhere else in the world that could replace the Island Trader?
SE-99051974	Roll on, Roll off is a great concept, but requiring forklifts to lift 7 ton, on a moving ramp (yes, we actually get waves and wind) is dangerous. And what happens if one forklift breaks down. Instead, have containers small enough for standard forklifts.
SE-98889215	The EIS should demonstrate that the selected design provides measurable improvement over a like-for-like replacement. At present, the proposal appears to be driven by global shipping trends rather than island-specific need.
SE-99355208	Concerns of time-consuming process for unloading the ship - Due to double handling for unpacking freight in unstuffing shed resulting in more time spent on handling freight compared to unloading a pallet… …Why not have the same type of vessel as Island Trader and unload the vessel in the same method.
SE-98894457	A RoRo freight delivery service is unsuitable for Lord Howe Island as the majority of the freight now delivered is not suitable to be containerised… …Consideration for the ramp should be discarded and the wharf upgrade for lift on lift off cargo should be pursued
SE-99523458	The environmental impacts of a RoRo and what will be required, extra ramps, anchorage ports in the Lagoon, heavier equipment that the roads and facilities on the island simply cannot handle will have the biggest negative environmental impact our island has ever seen. I agree with the project in concept that we need a new vessel. However what we need is a replacement, similar with some tweaks, to the island trader which has been modified and customised to Lord Howe Island's needs. This works. This system is not broken. The only problem is the ship is aging. We need a replacement "Island Trader".
SE-99564724	The proposal to upgrade to a roll-on roll-off ship is equally concerning. The idea may look sensible on paper, but our realities are different. Our tides, swell, and landing conditions are unpredictable, and a vessel of that type could pose greater danger, not less. What we need is a ship designed for Lord Howe – not a generic solution – something like the MV Island Trader or a new vessel built to the same principles, capable of safely accessing our jetty in the conditions we live with… … The proposed "RoRo" ship is completely impractical for our conditions and, frankly, a ridiculous idea. It does not reflect the realities of our tides, swell, or the way our community uses the jetty. We should be focusing on maintaining what already works, not replacing it with developments that don't fit our island.

Submitter ID	Example Text From Submission
SE-97971472	The construction of the "ramp" to facilitate RoRo containerised freight is NOT the preferred option of the Community Consultation Group and the wider Island Community.
SE-98592458	Roll on roll off loading ramp at jetty. This design is unfeasible for the proposed location.
SE-99677477	The "do-nothing" scenario presented in Section 2.6.3 frames the alternative – not proceeding with the project – as unacceptable and harmful to the island's future. This section is written in a way that is threatening in tone, implying that if residents oppose the CIP, the island will be left without essential services.

The use of RoRo was in preliminary costings, strategic and detailed business cases and concept designs intended to modernise the freight system while maintaining practicality for the Island's conditions. Freight-handling arrangements will be configured to provide mixed-freight flexibility and scalable capacity without reliance on oversized equipment or single-point dependencies that are not expected to suit the Island's workforce or spatial constraints. Where appropriate, options such as smaller container units, craned transfers and hybrid handling will be incorporated to preserve operational continuity during adverse conditions. Equipment specification, ramp geometry and berth configuration will be aligned with local capability so that routine operations do not require specialist resources unavailable on-island.

Future-proofing will be achieved by sizing infrastructure to foreseeable demand and compliance needs, enabling safe and efficient operations while avoiding unnecessary complexity or long-term cost exposure. Layouts, ramp-based solutions and support structures will be designed to accommodate incremental adjustments in vessel configuration or handling practice without major reconstruction, and operational thresholds will be defined to ensure cargo transfer occurs only under conditions not expected to compromise safety.

The overall approach modernises freight-handling through a RoRo-led solution while retaining adaptable handling methods for resilience, and that is proportionate to Lord Howe Island's unique marine, spatial and workforce realities.

5.5 ISSUES BEYOND THE SCOPE OF THE PROJECT

TABLE 5-23 EXAMPLE OF SUBMISSIONS REGARDING ISSUES BEYOND THE SCOPE OF THE PROJECT

Submitter ID	Example Text From Submission
SE-99755970	The disgraceful state of the roads should be addressed as soon as possible.
SE-98894457	The exposed storage of freight in an open vessel during heavy sea conditions will result in unnecessary damage to cargo.
SE-97971472	Mainland port - has this been considered/decided upon. It would be a misuse of funds if a vessel were built before a suitable port had been sorted out.
SE-99677477	The CIP depends on a new marine freight vessel and expanded marine infrastructure, but the design of the vessel is not part of this EIS and therefore cannot be assessed holistically. This is a fundamental failure of planning and transparency. This project is built on a "fairytale vessel" One that hasnt been built or we even know can be built.

Broader matters such as island-wide road conditions, cargo exposure on the vessel during sea voyages, the selection of a mainland port, and the separate procurement of the replacement ship are outside the scope of the EIS assessment. These matters will be progressed through their respective programs and do not alter the scope, objectives or technical requirements of the Project under consideration.

6. PROJECT JUSTIFICATION

6.1 PROJECT EVALUATION

The Project is located on Lord Howe Island, a World Heritage Listed property. The Project Area comprises a North Zone and a South Zone, which have an area of 21.1 ha and 9.9 ha respectively. The Project, which is part of the broader LHI CIP, includes the following:

- A freight handling facility with new and upgraded marine infrastructure including new fixed piled vessel ramp, upgrades to the existing jetty, boat ramp and maintenance area, cargo loading/unloading areas, biosecurity infrastructure, adaptive reuse of the 'Old Cargo Shed' and 'Ocean View' heritage buildings, viewing area, picnic area, landscaping, retaining walls, amenities and vehicle and boat trailer parking;
- WMF upgrades which include new storage sheds, materials processing facility, wastewater treatment plant, waste receival area, hardstand and roads, office for staff, and selective restoration of dunes;
- Dedicated dog kennels to house biosecurity detection dogs; and
- Self-service fuel bowser along Old Lagoon Road.

The key benefits of the Project include:

- Upgraded marine infrastructure which includes a new vessel ramp next to the existing jetty that will support the NSW Government's procurement of a new marine freight service to Lord Howe Island to replace the existing freight transport vessel which is nearing the end of its service life;
- Enhanced biosecurity measures to avoid the introduction and spread of invasive pest species that could harm and damage Lord Howe Island's endemic flora and fauna species which are significant to the World Heritage values of the island. The use of containerised freight to transport goods to Lord Howe Island and improved quarantine facilities will provide an uplift to biosecurity; and
- Delivering a fully functioning WMF that supports the day-to-day operations of the Island's tourism-led economy and complies with the requirements of the EPA and the facility's current EPL.

6.2 RESPONSE TO COMMUNITY VIEWS

Community engagement has informed and shaped the design of the Project, and the community will continue to be engaged during the detailed design and construction of the Project. In particular, the community was supportive of relocating the marine infrastructure in the North Zone (as opposed to the facilities as originally conceptualized in the South Zone), as it is currently a disturbed site and less impactful on the lagoon, lower risk, and will result in fewer disruptions to island operations.

Public submissions raised concerns about the overall scale and cost of the proposed facilities including the new fixed piled vessel ramp, the freight handling facility, and the dog kennels. Public submissions also expressed concern about the proposed changes to a marine vessel that can handle RoRo cargo.

The upgrades are necessary to bring facilities on the Island up to a modern standard that complies with relevant regulations and performance standards.

The EIS and this Submissions Report have demonstrated that the potential environmental, social and economic impacts can be appropriately managed and that the design of the Project has responded sensitively to Lord Howe Island's World Heritage values and the views of the local community.

In addition, the Proponent has undertaken further consultation with DCCEEW Commonwealth, Heritage NSW and NSW Marine Parks, to ensure that the Project is delivered in a considered and sensitive way that protects and preserves the significant natural environment and the cultural heritage values of Lord Howe Island.

6.3 CONSISTENCY WITH STRATEGIC CONTEXT

The objectives of the Lord Howe Island Critical Infrastructure Program include replacing the existing marine freight service with a new service, upgrading the freight handling facilities to improve safety and upgrading the waste management facility to comply with the conditions of its EPL and further improve biosecurity risk management. These must be done sensitively to minimise impacts to native vegetation, the marine environment, and the natural and cultural values of Lord Howe Island which collectively contribute to its values as a World Heritage property.

The Project is consistent with the NSW Government's objectives for the LHI CIP. In particular, the Project will:

- Contribute to the sustainable development on Lord Howe Island by modernising critical infrastructure on the island;
- Safeguard the unique natural environment of Lord Howe Island and protect it from biosecurity threats;
- Maintain the tourism economy of Lord Howe Island by providing a more reliable marine freight service and efficient loading and unloading facilities on the island;
- Engage the local community throughout the design, delivery and implementation of the Project; and
- Ensure mitigation measures are applied to avoid and minimise impacts to protect and preserve the World Heritage values of Lord Howe Island.

6.4 ACTIONS TAKEN TO AVOID/MINIMISE IMPACTS

The Project, as exhibited in the EIS, had been sensitively designed to avoid and minimise social, economic and environmental impacts. Extensive public consultation has taken place during the design and development of the Project, and this consultation will continue during the detailed design and construction phase to ensure the community and stakeholders are kept informed of the Project's progress and how construction impacts are being managed.

The Proponent will work closely with local businesses, accommodation providers and tourism operators on the island during the construction phase to ensure potential economic impacts are appropriately managed, and the influx of construction workforce can supplement visitor numbers and generate additional economic benefits during the off-peak tourism period.

The Project has been designed to minimise potential impacts to marine and terrestrial ecology associated with the piling works for the new piled vessel ramp and mooring dolphins, and vegetation clearing for new land-based facilities. The Project has also responded sensitively to built heritage on the Island including the Old Cargo Shed and Ocean View Boat Shed. Continued efforts to minimise potential impacts will be carried out progressively during the detailed design phase where safeguards and mitigation measures will be in place to implement avoid/minimise strategies where applicable.

7. REFERENCES

DPHI. (2024). *Significant Development Guidelines – Preparing a Submissions Report, Appendix C to the State Significant Development Guidelines .* NSW Department of Planing, Housing and Infrastructure.

ERM. (2025). *Lord Howe Island Critical Infrastructure Project - Environmental Impact Statement.* Sydney: Environmental Resources Management Australia.

IAQM. (2024). *Guidance on the assessment of dust from demolition and construction.* Institute of Air Quality Management.

APPENDIX A SUBMISSIONS REGISTER

Submission ID	Position	Location	The Project	Procedural Matters	Biodiversity	Heritage	Visual	Traffic	Social	Noise	Waste	Justification and Evaluation	Issues Beyond the Scope of the Project
SE-97610493	Support	Lord Howe Island, NSW											
SE-98037707	Support	Chatswood, NSW											
SE-98098460	Support	Cowes, VIC											
SE-98894457	Object	Lord Howe Island, NSW											
SE-97971472	Object	Lord Howe Island, NSW											
SE-99677477	Object	Lord Howe Island, NSW											
SE-98889215	Object	Lord Howe Island, NSW											
SE-99564724	Object	Lord Howe Island, NSW											
SE-98422463	Object	Lord Howe Island, NSW											
SE-98592458	Object	Lord Howe Island, NSW											
SE-99539707	Object	Lord Howe Island, NSW											
SE-99807707	Object	Lord Howe Island, NSW											
SE-99638714	Object	Lord Howe Island, NSW											
SE-99355208	Object	Lord Howe Island, NSW											
SE-99523458	Object	Lord Howe Island, NSW											
SE-99808708	Object	Lord Howe Island, NSW											
SE-99617458	Object	Lord Howe Island, NSW											
SE-98848472	Object	Lord Howe Island, NSW											
SE-98881958	Object	Lord Howe Island, NSW											
SE-99755970	Comment	Lord Howe Island, NSW											
SE-99557208	Comment	Lord Howe Island, NSW											
SE-99688226	Comment	Lord Howe Island, NSW											
SE-99828487	Comment	Lord Howe Island, NSW											
SE-99334716	Comment	Lord Howe Island, NSW											
SE-99558472	Comment	Lord Howe Island, NSW											
SE-99652460	Comment	Lord Howe Island, NSW											

Submission ID	Position	Location	The Project	Procedural Matters	Biodiversity	Heritage	Visual	Traffic	Social	Noise	Waste	Justification and Evaluation	Issues Beyond the Scope of the Project
SE-99051974	Comment	Lord Howe Island, NSW											
SE-97029957	Comment	Lord Howe Island, NSW											
SE-98630228	Comment	Lord Howe Island, NSW											
SE-98816236	Comment	Lord Howe Island, NSW											
SE-99560721	Comment	Lord Howe Island, NSW											
SE-98541708	Comment	Lord Howe Island, NSW											
SE-98390957	Comment	Turramurra, NSW											

APPENDIX B UPDATED MITIGATION MEASURES

ID	Mitigation and Management Measure	Timing
Air Quality		
AQ1	**Dust management** • Water sprays or soil stabilising polymers are used on exposed surfaces, unsealed roads, uncovered stockpiles and during loading and offloading. • Minimise the duration that soil is exposed to reduce dust and erosion risks. • Wind barriers will be placed on site before commencement of works and during the construction activity where required. • Stockpiles will be located in sheltered areas, where possible, or otherwise will be covered. • Vehicle speeds will be limited on unpaved roads to reduce dust generation. • Ensure all vehicle loads are covered.	During construction
AQ2	**Concrete batching** • The concrete batching plant should be located away from sensitive receptors. • All aggregate and sand should be stored in appropriate bins or bags to minimise dust generation. • Stockpiles, conveyers and loading/offloading points should be enclosed or covered. • Wet suppression will be applied to aggregate stockpiles. • Dust filters and overfill protection will be fitted to cement silos and hoppers. • Cement should be transferred from storage to batching using sealed steel augers.	During construction
AQ3	**Odour management** • An Odour Management Plan will be prepared for the WMF to ensure odour risks are assessed and appropriately mitigated. • Regular maintenance of the dehydrators, HotRot digestor (or other similar equipment) as per manufacturer's specifications. • Should the HotRot digestor be used to treat waste, regular maintenance and testing of the unit will be conducted as per manufacturer's specifications to confirm the system is performing correctly. • All organic processing equipment will be regularly cleaned. • Any offensive odour observed at the WMF by staff should be investigated to determine the nature and cause of the odour. Any mitigation measures required to prevent a re-occurrence will be implemented. • The current LHIB WMF Pollution Incident Response Management Plan will be updated once the upgraded WMF is operational.	During operation

ID	Mitigation and Management Measure	Timing
Terrestrial Ecology		
B1	**Vegetation clearance** • Vegetation clearing areas will be clearly demarcated and signed, where appropriate, to ensure no vegetation beyond these boundaries is removed. • No machinery will be parked in areas beyond the temporary fencing and no access will be allowed during construction. • Ancillary facilities such as stockpiles, site compounds and construction zones will not be located beyond the limits of clearing.	During construction
B2	Tree protection measures will be implemented for trees identified to be retained within the subject land and adjoining areas where the structural root zones have the potential to extend into the subject land.	During construction
B3	Vegetation clearing will be undertaken between June to August to avoid key migration and breeding periods for threatened and migratory birds.	During construction
B4	Pre-clearing surveys will be undertaken by a suitably qualified ecologist 1-2 days prior to vegetation clearance. Pre-clearing surveys will identify key habitat features and include searches for Lord Howe Placostylus.	Prior to construction
B5	A translocation plan will be prepared for the Lord Howe Plactostylus in accordance with the NSW Policy for Translocation of Threatened Fauna (DPIE, 2019).	Prior to construction
B6	An ecologist is to be present to supervise the removal of vegetation and associated habitat for the Lord Howe Plactostylus within the subject land to capture and relocate individuals as required.	During construction
B7	• An ecologist should be present during vegetation clearing to capture and relocate animals encountered during the clearance operation, including species inadvertently injured. • All people working on the vegetation clearing will be briefed about the possible fauna present and should avoid injuring any present. • Animals disturbed or dislodged during the clearance but not injured should be assisted to move to the adjacent retained vegetation or other specified locations. • If animals are injured during the vegetation clearance, the LHIB will be notified and if required the local vet contacted to assess the injured animal. Appropriate steps will be taken to treat the animal, however, if the animal is unlikely to survive, it will be humanely euthanized.	During construction

ID	Mitigation and Management Measure	Timing
B8	A Vegetation Management Plan (VMP) will be prepared prior to the commencement of construction. The VMP will include: • Measures that will be implemented to protect and enhance native vegetation. • Identify areas of native vegetation to be retained and areas to be revegetated with native species characteristic of the vegetation communities to be cleared. • Weed control measures to minimise the spread of weeds throughout the site and to areas outside the site. • Details of a wash down station to ensure construction vehicles, plant and equipment that are entering and leaving the site are washed down to prevent weed seeds entering or leaving the site. • Maintenance, monitoring and reporting requirements.	Prior to construction
B9	Erosion control measures will be implemented to reduce sedimentation on the construction site. These measures will include: • Minimising the area of soil exposed on the site at any given time; • Covering soil stockpiles when not in use to prevent soil erosion from heavy rainfall; • Establishing sediment fences around the perimeter of the development area; • Installing pollution traps and removal of pollution to an off-site location	During construction
Marine Ecology		

ME1	**Vessel Operations**
	• Prepare a Construction Vessel Operational Management Plan that specifies:
	  ◦ Required channel markers.
	  ◦ Procedures for ongoing supply vessel entrance, unloading and departure.
	  ◦ Restrictions to vessel speeds on approach and entry to the lagoon, while transiting the passage and while working in the Project area.
	  ◦ Draft requirements for construction vessels.
	  ◦ Compliance with the International Maritime Organisation International Convention for the Prevention of Pollution from Ships (MARPOL).
	  ◦ Hydrocarbon and waste handling procedure for marine operations.
	  ◦ Marine spill prevention, management and response.
	  ◦ Vessel sewage and sullage management, to be disposed of at an approved waste collection facility.
	  ◦ Where anchoring is required for work vessels and barges, this must be in accordance with Lord Howe Island Marine Park and LHIB anchoring restrictions, including:
	  – Vessels longer than 5 m are prohibited from anchoring anywhere in the lagoon.
	  – All vessels are prohibited from anchoring in sanctuary zones, with three exclusion areas for vessels less than 10 m long.
	  – Vessels must always aim to anchor in sand away from seagrass and coral.
	  – Vessels longer than 25 m may anchor only in the six designated roadstead sites – located outside the Lagoon (refer to Admiralty charts).
		Construction and Operation

ID	Mitigation and Management Measure	Timing
	◦ Construction vessels to use high-definition positioning systems. ◦ Invasive marine species protocols. ◦ (Where applicable) Adhere to Lord Howe Island Biosecurity - Visiting Vessels Guidelines (LHIB 2020). ◦ (Where applicable) Adhere to Australian ballast water management requirements and the International Maritime Organization's (IMO) 2011 Guidelines for the control and management of ships' ballast water and sediments to minimise the transfer of invasive aquatic species and LHIMP requirements.	
ME2	**Construction Activities** • Preparation of a Marine Construction Environmental Management Plan that specifies: ◦ Erosion and sediment control specifically to prevent/minimise risk to the marine environment. ◦ Selection of construction methods which minimise resuspension of sediments, increased turbidity. ◦ Consideration of tides when scheduling work/activities (e.g., boat ramp construction at low tide, vessel movements at high tide). ◦ Use of sediment/silt curtains to minimise sedimentation/ turbidity. ◦ Appropriate storage and procedures for hydrocarbon and waste management to minimise the risk of spills to the marine environment. ◦ Marine spill prevention, management and response. ◦ Relevant management measures from 'Guidelines for developments adjacent to national parks and other reserves' (NPWS 2020).	Construction
ME3	**Underwater Noise** • Prepare an Underwater Noise Management Plan that includes: ◦ 30 minute pre-start, 30 minute soft-starts to slowly increase the noise intensity to allow fish to move away from the noise source. ◦ Marine piling should aim to avoid high tide where practicable. ◦ Given Marine Fauna Observers (MFOs) are not necessarily a practical option to detect presence of fish during construction and some species are closely associated with habitat within predicted areas of impact, consider the use of bubble curtains, or other engineered solutions such as a piling sleeve or acoustic net to minimise noise propagation distance. ◦ Timing works to avoid important life-history periods for species. ◦ Develop and implement Management Zones (Exclusion and Observation Zones) for key marine fauna groups based on underwater noise modelling (**EIS Section 6.18**). These zones are intended to act as the key mitigation measure for protecting marine fauna and as such need to be designed to prevent TTS and PTS impacts on marine fauna, to achieve this outcome, the zones need to be broader than the modelled outputs. Persons with marine fauna observation (MFO) skills for critical construction periods (e.g., piling) ◦ Consider the use of respite days if high noise level activity (impact piling or vibratory piling) occurs on ◦ multiple successive days.	Construction

ID	Mitigation and Management Measure	Timing
	◦ Consider the use of bubble curtains, or other engineered solutions such as a piling sleeve or acoustic nets to minimise noise propagation distance.	
ME4	**Monitoring** • Prepare and implement a Marine Construction Monitoring Program, including: ◦ Regular inspection/ visual monitoring. ◦ Reactive monitoring during construction if plumes of concern are observed. ◦ Reactive water quality monitoring in the event of a spill. ◦ Periodic monitoring of groundwater and surface water. ◦ Long term monitoring of water and sediment quality. ◦ Pre-construction survey of benthic habitats that will be directly disturbed to ensure no critical ecosystems are disturbed. ◦ Pre-inspection of construction vessels for invasive marine species risk, biofouling, compliant antifouling. ◦ Consider ongoing monitoring for erosion, sediment movement and coastal change. ◦ Validation of underwater noise.	Pre-construction, construction and post construction
Physical Climate Change Risk		
CC1	**Extreme heat** • Heat-resistant materials will be used for the proposed infrastructure; • Light coloured materials with reflective surfaces will be used on buildings where appropriate; and • Ventilation and cooling will be provided for all equipment in waste management and other building facilities.	During construction
CC2	**Tropical cyclones** • The proposed infrastructure will be designed to withstand at least Terrain Category 2 wind speeds as per the Australian and New Zealand Standard (AS/NZ) 1170.2 (2021); and • Emergency power and repair equipment will be provided as appropriate.	During construction
CC3	**Water stress** • Water efficient devices will be installed where possible to new infrastructure; • Existing infrastructure should be fitted with water efficient devices where possible to minimise water loss (e.g., leak detection); and • Rainwater harvesting and on-site storage will be provided.	During construction

ID	Mitigation and Management Measure	Timing
CC4	**Coastal flooding and sea level rise** • Flood-resilient building materials will be used (e.g., concrete, marine-grade plywood, epoxy grout etc.); • Stormwater management measures (e.g. drainage systems) will be implemented; • Evacuation protocols and communication systems for emergency service support will be established in accordance with the LHI EMPLAN; and • The design of infrastructure will consider sea level rise and be elevated above projected sea level rise (i.e., > 0.3 m) if it is located below 0.3 m.	During construction
Greenhouse Gas Emissions		
GHG1	Energy efficiency will be considered during detailed design including measures to reduce energy consumption, material selection, and waste minimisation.	During detailed design
GHG2	A Sustainability Management Plan will be prepared to minimise the GHG emissions. The Plan will be implemented to achieve 'Design' and 'As Built' ratings of excellent under the Infrastructure Sustainability Council of Australia rating scheme.	During detailed design
GHG3	The following initiative will be considered during operations to reduce GHG emissions: • Reduce idling time of machinery. • Use biofuels (biodiesel, ethanol, or a blend such as E10) for construction equipment. • Limit vegetation clearance where feasible and revegetating with native species. • Use electric or hybrid powered equipment. • Combine diesel generators with solar PV to reduce diesel runtime with zero export limit so as to not impact the network. Where feasible, use solar powered generators for temporary site power. • Deployment of solar PVs and battery energy storage system (BESS) to reduce the reliance on diesel generators for power supply at the WMF with zero export limit so as to not impact the network.	During operation
GHG4	**Freight handling facility** The following initiative will be considered during operations to reduce GHG emissions: • Replace diesel-operated small and medium forklifts, and cranes with electric or hybrid models. • Replace diesel-operated trucks with battery electric trucks or hybrid trucks to reduce fuel consumption and emissions. • Reduce idle time of forklifts and cranes by improving the loading/unloading operation schedule. • Optimise trucks' route to reduce travel distance and maximize the truck capacity to reduce the number of trips. • Install solar panels on the unstuffing / stuffing shed roof or nearby land to generate clean electricity to power the shed and equipment.	During operation

ID	Mitigation and Management Measure	Timing
GHG5	**Waste management facility** The following initiative will be considered during operations to reduce GHG emissions: • Minimise electrical load by implementing lockout procedures and automated systems that reduce equipment idle time. • Generate onsite renewable energy by installing solar panels on rooftops, car parks, or nearby land to power the equipment. • Source electricity from the grid despite relying on diesel generators to produce power on-site. • Use energy-efficient equipment and machinery models.	During operation
Contamination (North Zone)		
Cn1	Materials to be reused or disposed offsite will be classified in accordance with the NSW EPA Waste Classification Guidelines or relevant Resource Recovery Exemption/Order.	During construction
Cn2	A Construction Environmental Management Plan will be prepared prior to construction to provide the controls and mitigation measures for managing potential risk to the environment during construction. The CEMP will include an unexpected finds protocol and erosion and sediment control plans.	Prior to construction
Contamination (South Zone)		
Cn3	Residual waste on the surface of the WMF area, including residential and building materials, will be managed prior to the construction work.	Prior to construction
Cn4	An asbestos management plan will be prepared to address how asbestos will be managed during construction and the longer term.	Prior to construction
Cn5	Any soils with asbestos will be managed during construction in accordance with WHS regulations.	During construction
Cn6	A Construction Environmental Management Plan including a Material Management/Reuse Plan and Unexpected Find Protocols (UXFP) will be prepared.	Prior to construction
Cn7	Any materials applied to the land in 2009 prior to the current EPL are permitted to remain on site.	During construction
Design and Place		
D1	**Built form** • New buildings in the North Zone should be built in a similar style and materiality to buildings within the local vicinity. • New buildings in the South Zone should be simple and industrial to reflect their function, with roof profiles to reflect the nearby Airport Terminal building.	Detailed design

ID	Mitigation and Management Measure	Timing
D2	**Colours and materials** • New buildings in the North Zone should use colours that are light in tone with a sandy to off-white range to reflect building colours in that part of the Island. • New buildings in the WMF should use visually recessive materials and darker coloured roofs, walls and structures to aid in camouflaging buildings from viewpoints and adjoining areas. • The new dog kennel building colours should be light in tone to reflect the colouring of the adjacent BoM building.	Detailed design
D3	**Retaining walls, barriers and fencing** • Retaining walls should include a post and panel wall and a precast concrete panel wall. Wall finishes and colours will complement neighbouring buildings and the surrounding landscape. • Vehicle barriers will include timber bollards and steel crash barriers and robust and functionally capable of withstanding heavy forces, while also being visually streamlined. • New fencing at the WMF will be a chain link fence consistent with the existing fence type.	Detailed design
Visual Impact		
L1	**Landscaping design** • Hardstand areas in the North Zone should use paving which is more visually appealing compared with asphalt. • Existing vegetation and trees should be retained where possible to provide shade and cooling. • Screening trees and vines shall be provided in the landscape design to soften and screen retaining walls and new buildings. • Only provenance plant material (plants grown from locally collected seeds) will be used, and all plants will be grown on Island. • Newly planted trees will be provisioned in 45 litre and 25 litre pot sizes, allowing for reduced growing times to reach their mature heights.	Detailed design
L2	• Minimise areas for stockpiling soil, mulch or compost where possible to reduce the visual impacts of these stockpiles. • Additional plantings should be provided around the WMF to ensure optimal screening around site facilities. • At locations where greater visual impacts have been identified, mature sized shrubs and trees should be incorporated to reduce the visual impacts.	Construction

ID	Mitigation and Management Measure	Timing
L3	• Detailed design and documentation drawings should define the extent of all construction activity, including any temporary works outside of the Project Area boundary. • Construction facilities will be contained within the construction works zone boundary and occupy the minimum area practicable for their intended use. • Provide suitable barriers to screen views from adjacent areas. • Once construction is complete, or progressively throughout the works where possible, these sites should be returned to at least their pre-construction state, and where feasible, improved. • Pollution and dust emissions will be kept to a minimum and monitor throughout the construction period. • Existing trees and vegetation to be retained within construction areas will be identified, protected and maintained. • Heritage items will be protected as required to avoid damage during construction activities.	Construction
Economic Impact		
Ec1	A Local Employment Plan will be developed for the Project to encourage and set targets for local employment.	Prior to construction
Ec2	A detailed Workforce Accommodation Plan (WAP) will be prepared for the Project. The WAP should: • Monitor the available accommodation options on the Island; • Consult with local accommodation operators and provide information on the construction timing, workforce estimates and accommodation requirements; • Provide a register of local accommodation options and contact details to the EPC contractor; • Review workforce predictions during construction to ensure that accommodation requirements can be met; and • Identify any potential overlaps with peak demand periods for accommodation and engage with key stakeholders.	Prior to, and during construction
Biosecurity		
Bs1	A Biosecurity Risk Management Plan (BRMP) and associated sub-plans will be prepared prior to construction and shall: • Define roles and responsibilities of key personnel; • Describe the Project Area including infrastructure, flood/storm surge risk, proximity to import pathway, sea discharge points; • Describe cargo (size, complexity), construction processes, and associated biosecurity risks; • Detail imported cargo pathway and biosecurity processes across supply chain; • Identify biosecurity risks (animal, plant, pathogens, soil, water) and add to a Biosecurity Risk Register as needed; • Develop contingency plans (e.g., cyclones, vessel redirection, contamination); • Deliver biosecurity awareness training (inductions, toolbox talks, pre-starts);	Prior to construction

ID	Mitigation and Management Measure	Timing
	• Define unloading procedures; • Detail inspection and clearance procedures including work instructions and records; • Detail cleaning and treatment procedures for biosecurity risk cargo; • Describe biosecurity waste management (segregation, containment, disposal); and • The BRMP shall be reviewed by the LHIB and the Biosecurity Technical Advisory Group (BTAG).	
Bs2	The BRMP will include a dedicated Construction Biosecurity Risk Management Sub-plan including: • Site management and inspection regimes (cargo protocols, surveillance, emergency response) for the mainland facility • Inspection on the Island would be conducted by LHIB before being cleared to offload; • Training in emergency biosecurity response procedures for all contractor staff and subcontractors in line with LHIB process; • Procedures to maintain cargo biosecurity integrity; • Cross-contamination prevention (e.g., containerisation, tarping, chemical treatments); • Supplier/contractor compliance with biosecurity requirements; • Identification and traceability of goods; • Management of detected biosecurity risk material; • Recording and reporting (incidents, detections, inspections, treatments, training, audits, KPIs); and • Regular monitoring and audits to ensure compliance and effectiveness.	Prior to construction, during construction
Bs3	The BRMP will include an Operational Biosecurity Risk Management Sub-plan including: • Site management and inspection regimes (cargo protocols, surveillance, emergency response); • Training for all staff in emergency biosecurity response procedures; • Procedures to maintain cargo biosecurity integrity; • Cross-contamination prevention (e.g., containerisation, tarping, chemical treatments); • Supplier/contractor compliance with biosecurity requirements; • Identification and traceability of goods; • Management of detected biosecurity risk material; • Recording and reporting (incidents, detections, inspections, treatments, training, audits, KPIs); and • Regular monitoring and audits to ensure compliance and effectiveness; • Continued biosecurity awareness initiatives and refresher training; and • Updates to the Biosecurity Risk Register as necessary when new risks emerge.	During operation
Bs4	The recommendations in the BRMF (EIS Appendix O), including appendices, also form part of the mitigation measures for biosecurity risk.	Prior to construction, construction, operation

ID	Mitigation and Management Measure	Timing
Airport Safeguarding		
AS1	Prior to construction commencing, the Applicant must obtain approval from the airport operator and Airservices Australia for any cranes that infringe the OLS.	Prior to construction
AS2	The final designs of the buildings in the WMF should be reviewed to confirm compliance with the relevant building windshear and turbulence requirements.	Prior to construction
AS3	Proposed lighting shall comply with NASF Guideline C and Part 139 MOS (2019) requirements to ensure it does not distract or mislead pilots.	Prior to construction
Historic Heritage		
HH1	A photographic record of the North Zone and the Cargo Shed Group should be prepared before and after the construction works.	Prior to construction
HH2	The original timber roof truss members of the Ocean View Boatshed should be retained and a condition assessment be undertaken by a heritage architect and/or engineer. Any works that may impact on truss elements must be discussed with a heritage consultant, with advice provided on any remedial or repair work that may be required for the trusses, with any recommended works to be implemented as part of the works.	Prior to and during construction
HH3	The proposed decking design for the Former Cargo Shed should be reviewed by a heritage consultant and/or archaeologist to ensure the new works are sympathetic to the Cargo Shed and sensitive to the archaeological remains of the former jetty. The existing stairs, retaining wall and remains of the former jetty should be retained in situ.	Prior to construction
HH4	The extent of the proposed vehicle crash barrier around the Former Cargo Shed, should be reduced, if possible, to minimise its visual and physical dominance. Solutions provided must meet operational safety requirements for vehicles, workers and pedestrians. Specific treatment material will be selected in consultation with Heritage NSW as part of the detailed design post-consent.	During detailed design
HH5	Chemically compatible, breathable paint should be used where earlier painted surfaces are retained or repaired and repainted, or where there is potential for adverse chemical interaction. The paint palette should include darker toned paint colour for timber battening and window frames to contrast the lighter tones used on wall sheeting/cladding to reflect the paint tones shown in historic photographs.	During construction
HH6	A Heritage Interpretation Strategy should be prepared to support the conservation and ongoing use of Wilsons Landing (North Zone).	Prior to and following construction

ID	Mitigation and Management Measure	Timing
HH7	Before work commences, all contractors must be briefed through a Heritage Induction on the heritage values of the Lord Howe Island Group and the Cargo Shed Group.	During construction
HH8	If cultural heritage sites or materials (or suspected cultural sites or materials) are discovered during earthworks an Unexpected Finds Procedure is to be implemented.	During construction
Maritime Heritage		
MH1	A maritime archaeological unexpected finds protocol will be prepared by a suitable qualified maritime archaeologist for the Project. This would include an outline of the stop works provisions and who to contact in the event that an unexpected maritime archaeological find is made during construction works.	Prior to construction
Airborne Noise		
NV1	A Construction Noise Management and Vibration Plan (CNVMP) containing noise mitigation and management measures shall be created for the construction phase of this Project.	Prior to construction
NV2	Noise generating work and activities should be (as proposed) limited (where possible) to the ICNG recommended standard hours (i.e., 7am to 6pm Monday to Friday and 8am to 1pm Saturdays and no work on Sundays or public holidays).	During construction
NV3	Where construction activities that generate higher noise levels (>55 dB(A)) are undertaken close to the Project boundary, respite periods (e.g., three hours of work, followed by one hour of respite) should be applied, if possible. Note that respite may extend the duration of works and inadvertently increase noise impacts. Hence, due care should be taken when considering this management measure.	During construction
NV4	When selecting equipment for use in construction, equipment noise specifications should be reviewed to select the quietest and most appropriate equipment for each task. Equipment should not be over-powered for the tasks being performed.	During construction
NV5	Efficient work practices should be adopted to minimise the total construction period and the number of noise sources on the site.	During construction
NV6	Unnecessary noise due to idling engines should be avoided. High engine speeds should be avoided when equipment can be powered down and lower engine speeds are feasible.	During construction
NV7	All equipment used for the Project should be maintained to minimise noise, with consideration of exhaust silencers, covers on engines and inspection of squeaking or rattling components. Excessive noise-generating machines should be repaired or removed from the site.	During construction
NV8	Reversal alarms shall be replaced with broadband “squash duck” motion alarms, where feasible.	During construction

ID	Mitigation and Management Measure	Timing
NV9	If noise complaints are received, operator attended noise validation and compliance monitoring should be undertaken to compare site noise levels to the NMLs. All site noise levels should be measured and quantified in the absence of any influential noise sources not associated with the Project. If the measured site noise levels are above the NMLs, further mitigation and/or management measures should be considered.	During construction
NV10	Unattended noise monitoring systems are recommended to be established at selected NSRs depending on the different activities and stages of construction when such details are finalised. The results may be used to improve the noise mitigation and management measures for the Project so that best practice noise control is continually implemented.	During construction
NV11	Construction traffic noise management should include site awareness training and environmental inductions for construction staff, highlighting driving practices to minimise traffic noise impacts on the sensitive receivers.	During construction
Underwater Noise		
NV12	Low tide times should be considered with respect to the timing of piling works to reduce the underwater noise propagation and associated noise exposure.	During construction
NV13	A soft start procedure shall be implemented for piling works, i.e. piling impact energy is gradually increased over a 10 minute period to alert animals and enable them to move away to distance where injury is unlikely. The soft start procedure shall be used after break in piling activity of more than 30 minutes.	During construction
NV14	Where practicable, piling works shall be undertaken outside of the whale migration season (May to November).	During construction
NV15	A suitably qualified marine fauna observer (MFO) with experience in marine mammal identification, behaviour identification and distance estimation shall be present during piling works.	During construction
NV16	Safety Zones should be established to monitor for the presence of mega fauna prior to and during noisy activities. The Safety Zone shall include an Observation Zone and a Shut-down Zone. The movement of marine mammals shall be monitored within the Observation Zone and when a marine mammal is sighted within or appears to enter the Shut-down Zone, piling activities must be stopped as soon as practical.	During construction

ID	Mitigation and Management Measure	Timing
Protected and Sensitive Lands		
PS1	The Proponent shall prepare a Coastal Zone Emergency Action and/or update the existing Lord Howe Island Local Emergency Management Plan. This should identify at-risk assets, define evacuation routes and procedures, and establish response protocols for coastal erosion, storm tide and wave run-up events at the facilities.	Prior to operation
PS2	The Proponent shall undertake monitoring and adaptive management by implementing the following measures: • Implement a long-term coastal monitoring program, including surveys of shoreline position, dune condition, and revetment performance; • Periodically review hazard parameters against updated sea level rise and wave climate projections and incorporate adaptive design allowances (freeboard or modular structural elements) that can be upgraded as conditions change; and • Long-term monitoring of the reef geometry and characteristics, informing about potential climate change effects and its consequent effects on the wave climate inside the lagoon.	During operation
PS3	The Proponent shall undertake asset protection measures by implementing the following measures: • Maintain dune vegetation in the southern area as a natural buffer to attenuate wave energy and limit run-up impacts. Inspect and maintain the northern revetment regularly to ensure stability and design performance; and • Establish site access restrictions during storm events, particularly in the North Zone where overtopping discharges may pose a direct safety hazard. Install temporary or demountable barriers where feasible to protect critical infrastructure during forecast extreme events.	During operation
Social		
S1	A Stakeholder Engagement Plan (SEP) will be prepared and tailored to the construction and operation of the Project to: • Facilitate continued opportunity for stakeholders to engage with the Proponent on decisions in relation to Project design and management where reasonable; • Provide opt-in engagement options allowing stakeholders to participate at their convenience; • Ensure that diverse and inclusive engagement methods are tailored to stakeholders to minimise redundancy; • Provide regular Project updates (e.g., electronic and hard-copy communication materials) and seek input from stakeholders in relation to their concerns and/or impacts that are being experienced; • Consider alternative engagement options to reduce stakeholder fatigue as required; • Implement a grievance mechanism throughout the life of the Project to manage concerns that may arise during day-to-day construction and operational activities; and • Promote awareness of mental health through their website and ongoing engagement activities.	Prior to construction

ID	Mitigation and Management Measure	Timing
Soils		
So1	A Construction Soil and Water Management Plan (CSWMP) shall be prepared as a sub-plan to the CEMP. The CSWMP shall address specific erosion risks and water pollution including: • Erosion and Sediment Control Plans (ESCPs) for all work sites. ESCPs will be implemented in advance of site disturbance and will be updated as required as the work progresses and the sites change; and • Management procedures for activities, which may result in water pollution or to minimise the risk of erosion and sedimentation.	Prior to construction
So2	During construction, clearing limits will be marked out to minimise the extent of the clearing and disturbance.	During construction
So3	Clean water diversions (drains and sediment basins) shall be installed prior to undertaking other land disturbance activities.	During construction
Sustainability		
Su1	The Project's sustainability performance shall be assessed using the IS Essentials framework. A target rating of 'Bronze' under the IS Design and As-built rating tool, with a score of 20 to 39.9 points, and a stretch target for 'Silver' rating (i.e. 40 to 59.9 points) shall be adopted for this Project.	During detailed design
Su2	During detailed design and construction planning, the Project should minimise impacts on sensitive areas, plan revegetation with native species, and adopt strict erosion and sediment controls.	During detailed design
Su3	Low-carbon construction materials and fuel-efficient equipment shall be used. Where practical, the Project shall be connected to the Island's hybrid renewable energy system.	During detailed design
Su4	A climate risk assessment shall be prepared and should incorporate adaptive design and resilience strategies.	During detailed design
Su5	Renewable energy sources and climate resilience infrastructure design should be prioritised.	During detailed design
Transport and Traffic		
TT1	A Construction Traffic Management Plan (CTMP) shall be prepared prior to the commencement of construction. The CTMP should consider and include measures to address the following: • Heavy vehicle movements scheduled to avoid peak disruptions; • Equipment for works in the South Zone to be stored near the construction site to avoid additional traffic movements on Lagoon Road; • Construction staff to be encouraged to walk or cycle to work sites, or utilise shuttle buses to minimise traffic movements;	Prior to construction

ID	Mitigation and Management Measure	Timing
	• Consider the use of temporary traffic management to limit construction vehicles to 10km/h for short distances at locations with a high number of vulnerable road users such as pedestrians and cyclists, as well as being adjacent to the school, playground, beach accesses and sporting ovals; • All drivers receive induction training on local road conditions and speed limits, with driver's behaviour monitored during construction to ensure compliance; • Vehicle-to-vehicle communication in MRVs to ensure drivers can communicate to reduce the need to pass at narrow sections of Lagoon Road and at the South Zone entry on Old Lagoon Road; • Residents and businesses are notified in advance of works to reduce impacts, with local access maintained and Project car parking restricted to within work zones; and • Regular road inspections are to be conducted for dirt, debris and damage, followed by cleaning and maintenance where necessary.	
Waste		
WM1	A Construction Waste Management Plan (CWMP) shall be prepared by the construction contractor and would incorporate the applicable provisions of the POEO Act, POEO Regulation and all applicable EPA guidelines. The CWMP would address the volumes and type of waste streams to be generated, the correct classification method, storage and treatment. The CWMP will include the management measures outlined in EIS Appendix Z, the POEO Act, *Protection of the Environment Operations (Waste) Regulations 2014*, and the NSW Waste and Sustainable Materials Strategy 2041, Stage 1:2021-2027.	Prior to construction
WM2	During construction works, the following measures should be considered to manage waste: • Mark out clearing limits to minimise the extent of clearing and disturbance and hence vegetation waste. • Topsoil should be carefully stripped and placed aside during early construction stages for future reuse. • Stockpiled materials should be clearly segregated into distinct, manageable components with visible signage, and should not exceed 4 m in height to maintain manageability, minimise dust and fire risks and ensure stability. Generally, stockpiles should be lower than surrounding structure and should be covered to minimise dust generation.	During construction
WM3	During bulk excavation activities, an unexpected finds protocol should be implemented and any unexpected finds of 'contaminated' soils are required to be segregated for separate assessment, handling, transport and disposal under suitable control.	During construction
WM4	During demolition work, a waste separation protocol should be implemented. Materials should be segregated at source into distinct waste streams (e.g., concrete, brick, timber, ferrous and non-ferrous metals, glass, plasterboard) and pre-classified soil waste using designated containment systems to prevent cross-contamination. Recyclable aggregates should be stockpiled for crushing and reuse.	During construction

ID	Mitigation and Management Measure	Timing
WM5	The 150 m^3 of imported material located south of the former effluent drying beds and pre-classified as Special Waste Asbestos (chemically classified as General Solid Waste [non-putrescible]) should be managed and disposed of separately from the other soils to be excavated and pre-classified as General Solid Waste to minimise potential cross-contamination	During construction
WM6	During construction, materials should be temporarily stockpiled away from site boundaries, stormwater drains, natural waterways, pedestrian paths, and vehicle access points to reduce environmental risks and prevent contaminant migration.	During construction
WM7	Stockpiles should also be located away from surface watercourses and flood-prone areas.	During construction
WM8	If unexpected material is generated during construction and/or operation, it should be temporarily stockpiled separately while it is classified and assessed if it can be reused onsite.	During construction
Water – Hydrology		
Hy1	Design: • A detailed flood assessment should be undertaken during detailed design to determine future climate change related flood risks. • The grass swale near the existing boat ramp will need additional rock riprap. • The thickness of rock riprap should be no less than 1.5 times the largest diameter rock. • Refine scour protection when the sizes of drainage assets are confirmed and velocities can be confirmed with modelling. • Detailed sizing of gross pollutants traps (GPT) and in-ground emergency containment structures should be undertaken during detailed design. • The design must consider stormwater quality management as outlined in EIS Appendix AA.	Prior to construction
Hy2	Construction: • Prioritise high-risk earthworks during dry periods. • Install diversion bunds for offsite overland flows to reduce the amount of water that needs to be treated. • If concrete is to be cast onsite, concrete washout bays should be considered to manage pH and turbidity impacts. • Site facilities should be located outside of high flood hazard areas in a 1% AEP event. • Use localised excavations as sediment basins, where practicable. • Consider use of bioretention swales as elongated sediment basins.	During construction
Hy3	Operation: • Install rainwater tanks to capture rainwater for reuse rather than allowing it to flow offsite. • Buildings are to be located outside high flood hazard areas based on a 1% AEP event.	During operation

ID	Mitigation and Management Measure	Timing
Water – Quality		

WQ1	Construction:
	• High-risk construction activities should be undertaken in dry periods, where practicable.
	• If possible, construction should be staged to minimise areas that are exposed at any one time.
	• The contractor must implement dust management procedures to minimise dust generation.
	• Soil and stockpiles should be managed in accordance with Section 5, Section 6, and Appendix C of Book 1 of the IECA 2008, specifically stockpiles should be:
	  ◦ Appropriately protected from wind, rain and excessive surface flows in accordance with current best practice.
	  ◦ Located at least 2 m from hazardous areas, retained vegetation or overland flows.
	  ◦ Located at least 100 m from waterways, drainage lines.
	  ◦ Located up-stream from an appropriate sediment control system.
		Construction

WQ2	A Spill Management Plan shall be prepared as a sub-plan to the CEMP and will include measures to prevent, contain, absorb and clean any accidental spills.	Prior to construction
WQ3	The Concept ESCP (Appendix A of EIS Appendix AA) is to be reviewed and updated during detailed design. Erosion and sedimentation control measures are to be implemented prior to breaking ground on the Project site.	Prior to construction

APPENDIX C REVISED STATEMENT OF HERITAGE IMPACT

APPENDIX D UPDATED URBAN DESIGN REPORT

ERM HAS OVER 140 OFFICES ACROSS THE FOLLOWING COUNTRIES AND TERRITORIES WORLDWIDE

Argentina
Australia
Belgium
Brazil
Canada
China
Colombia
Denmark
France
Germany
Hong Kong
India
Indonesia
Ireland
Italy
Japan
Kazakhstan
Kenya
Malaysia
Mexico
Mozambique
Netherlands
New Zealand
Panama
Peru
Poland
Portugal
Romania
Singapore
South Africa
South Korea
Spain
Switzerland
Taiwan
Thailand
UAE
UK
US
Vietnam

Environmental Resources Management Australia Pty Ltd

Level 14, 207 Kent Street
Sydney, NSW 2000

T +61 2 8485 8888

www.erm.com