

RESPONSE TO SUBMISSIONS

New Grafton Correctional Centre



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NEW GRAFTON CORRECTIONAL CENTRE RESPONSE TO SUBMISSIONS

**Prepared for
Infrastructure NSW**

**By
BBC Consulting Planners**

September 2017



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1. INTRODUCTION

This Response to Submissions Report has been prepared to provide a response to the submissions lodged with the Department of Planning and Environment (DPE) in response to the public exhibition of SSD 17_8368 for the New Grafton Correctional Centre (Stage 2 Design, Construction & Operation).

SSD 17_8368 was publicly exhibited from 16 June 2017 to 31 July 2017.

The Proponent, Infrastructure NSW (INSW) has considered the issues raised in the submissions made during the exhibition period and has implemented various actions in relation thereto. This report presents the following:

- Details of the community consultation undertaken during the public exhibition period and consultation plans moving forward (Section 2);
- A summary of the submissions received during the public exhibition period and responses to the issues raised in submissions (Section 2);
- Discussion of key issues including those raised by the DPE (Section 4);
- Details of concrete batching and pre-cast operations (Section 5);
- Recommended mitigation measures (Section 6).

1.1 Proposal Overview

The construction of a correctional centre comprising maximum and minimum security facilities accommodating 1,700 inmates including:

- A facility designed as a maximum security facility for 1000 male inmates and 300 female inmates.
- A facility designed as a minimum security facility for 400 male inmates.

The development includes:

- GFA – 90,700 square metres;
- Approximately 62 buildings with a maximum building height not exceeding 10 metres.
- A six metre high fence or wall will be constructed around the perimeter of the each facility, with light and security camera poles up to 12 metres in height.

- Visitor reception, staff amenities, tank farm, stores buildings, operations support unit, and energy plant will be located outside the perimeter walls / fences.
- Internal access into and out of the correctional centre from Avenue Road and internal security and fire access roads will be provided
- Car parking for approximately 700 staff and visitor cars with an overflow area accommodating a further 150 cars.
- Other associated facilities include recreational oval, special accommodation units, health facilities, education and programs areas, administration, workshops, staff amenities, visitor facilities and utilities.
- A wastewater treatment system that allows for collection, treatment and total on-site reuse via a nominal 550KL/day Class A+ Membrane Bioreactor Style Wastewater Treatment Plant. Effluent production in excess of the facility's re-use requirement is delivered to the wet weather storage lagoon for disposal across the designated broad scale irrigation area.
- A 100-metre wide Asset Protection Zone (APZ) would be cleared around the correctional centre and associated facilities and car parking.
- A vegetation buffer outside the APZ would be provided along the northern, eastern and southern boundaries of the site. The buffer will be 50 metres wide along the northern property boundary, 15 metres wide to the east along Avenue Road and 30 metres wide along the southern property boundary (to be established as part of Stage 1 works);
- Site landscaping and tree removal;
- Earthworks as required for Stage 2 works;
- Associated development including connecting to utilities reticulation, external lighting and the like.

1.2 Summary of Submissions

During and after the public exhibition period 26 submissions were received by DPE. 19 of these submissions were from the public and 7 from public authorities. These submissions are summarised in Section 2.

Additional comments were received from DPE. These are also addressed in the table to Section 2 and in Section 3.

The submissions from public authorities made comments relevant to areas of their responsibility.



Of the nineteen submissions from members of the public, one submission supported the proposal, ten raised objections to the development in part or in whole and six submissions did not object outright yet nonetheless raised concerns or made comments for further consideration.

Two submissions in relation to the provision of HV electricity supply to the facility objected to the alignment of the supply along Reilly Lane which is not part of the proposed development. However, INSW have advised that detailed investigations to identify a preferred route for the HV powerlines are continuing. It has been further confirmed that Reilleys Lane is not suitable and will no longer be considered. Once a preferred route has been confirmed, consultation will be carried out. A separate planning process has been undertaken for the HV supply route.

2. CONSULTATION

2.1 Consultation during preparation of EIS

The following activities were undertaken to inform the preparation of the EIS:

- Meetings with key stakeholders including Clarence Valley Council, relevant government agencies and departments, Grafton Chamber of Commerce etc;
- Presentations and meetings with stakeholder groups including the Clarence Valley Roundtable, Northern District Health, Grafton Correctional Centre, Grafton Police and indigenous groups and organisations;
- Meetings with directly affected landowners and neighbours, both one on one meetings and a group meeting with affected landowners;
- Project website was established, together with an 1800 number and project email;
- Newsletter distributed to over 22,000 residences and businesses;
- Focus groups with the community;
- Meeting with Clarence Youth Alliance;
- Displays and intercept sessions held in high footfall areas such as shopping centres and markets.

Details of this consultation and its outcome are presented in Appendix 25 of the EIS.

In addition, consultation was undertaken as required by specialist consultants in undertaking assessments for the design of the development and this EIS.

2.2 Consultation following start of EIS public exhibition period

The EIS was exhibited by the Department of Planning and Environment from Friday 16 June to Monday 31 July 2017 (six weeks) for public comment. During this time, Northern Pathways undertook further community consultation as described in the *Phase Two EIS Exhibition Period Engagement – Outcomes Report* prepared by Straight Talk, August 2017.

2.2.1 Summary of activities

The following stakeholder groups were identified in the SIA Engagement and Communication Plan for consultation during the exhibition period:

- Directly-affected landowners and neighbours are those people living or owning land in the direct vicinity of the site of the NGCC;
- Key stakeholders include those agencies and organisations who have responsibility for services, facilities or community support programs that may

be impacted by the NGCC. These include key community groups, Aboriginal Land Council's and advocacy groups in the area, as well as businesses, educational and other governmental facilities and services in the Grafton area;

- Hard-to-reach groups including; Aboriginal communities, socially and economically disadvantaged residents and young people are likely to be some of the most impacted stakeholders. Yet these key stakeholders are often the most difficult to engage with through broader community engagement activities. The Plan identified that it was critical that these key stakeholders were identified separately and that engagement activities were tailored to invite their important input;
- The general community refers to the wider community living within the Clarence Valley Local Government Area.

Engagement activities and communication were tailored to be relevant and meaningful to each target audience.

Over 580 people participated in the consultation which included a range of methods:

- Directly affected landowners and neighbours' workshops and meetings - two group workshops were held with directly affected landowners and neighbours. One-on-one meetings were also offered to all directly affected landowner and neighbours to explain the EIS and capture their feedback at a time and place convenient to them. These meetings and workshops were supported by letters, emails and telephone calls to maintain contact, respond directly to questions and build relationships;
- General community workshop - two community workshops were run to present the EIS and capture the general community's views on the suggested impacts and mitigation measures;
- Pop up events - four pop up information stalls were held throughout the exhibition period;
- Stakeholder meetings and workshops - 12 workshops and meetings were held with key stakeholder groups;
- Aboriginal meetings: yarning circles - three yarning circles and one design meeting were held with local Aboriginal stakeholders to explore and capture feedback on the project's impacts and mitigation strategies;
- NAIDOC pop ups - pop up information stalls were held at two NAIDOC family days in Maclean and Grafton;
- One Thing Lunch Straight Talk designed and hosted a lunch targeting socially and economically disadvantaged members of the Grafton community;
- Youth involvement including two meetings with Clarence Youth Action (CYA) Group and two, one-hour workshops with senior students at Grafton High School and Clarence Valley Anglican School focusing on positive and

negative perceptions of Grafton, with some group discussion about what participants had heard about the NGCC.

The purpose of the consultation program was: to explore if the impacts and mitigations measures outlined in the EIS and SIA were accurate; direct the public on how to make a submission on the EIS; and more broadly, gain a deeper understanding of the perceived strength, challenges and impacts of the NGCC.

2.2.2 Key outcomes and actions

Overall, the following key themes were identified:

- There was overall support for the NGCC from all stakeholders, except from directly affected landowners and neighbours. Even when participants had a concern or raised an issue with the proposal, they identified that overall, the project would be beneficial and have a positive impact on the local community
- There were no significant gaps in the impacts or mitigation measures identified by the EIS and SIA. Instead participants emphasised how important it was for the project team to understand the gravity of the identified impacts and to successfully implement mitigation measures. Early planning and providing project partners and the public with clear and detailed information were considered crucial in setting mitigation measures up to be successful
- Issues remained largely consistent with those raised in the Phase 1 consultation, that of: the importance of local employment; making sure local businesses and suppliers benefit from construction and operations; and opportunities to support young people, Aboriginal communities and people who are socially disadvantaged. The key issues raised in the Phase 2 consultation were:
 - Community benefit - and how it would be safeguarded and shared throughout the community was important. The project's potential to deliver community benefits was raised frequently. However, participants identified that in the past, infrastructure projects had, over-promised and under-delivered, when it came to community benefits.
 - Employment targets - were the key project impact and priority raised in the consultation. Participants commended the employment targets set out in the EIS, particularly for local employment, Aboriginal employment, traineeships and local supply chains. Participants said that these targets needed to be well managed to be achieved
 - Visitor management - was raised as an important requirement of the NGCC. Participants believed that visitor management was required for different reasons; some were concerned about a rise in anti-social behaviour, others were concerned about the wellbeing of visitors and

inmates. Participants frequently suggested mechanisms to provide visitors with affordable and safe waiting spaces

- o Inmate support and release programs - many participants considered the reintegration of inmates as an important measure of the project's success. Participants said that the NGCC needed to be proactive in partnering with community organisations to support inmate wellbeing, reduce reoffending and prevent community groups from being over stretched with assisting newly released persons
- The issues for participants were consistent across the consultation, except for directly affected landowners and neighbours, who had unique key concerns and issues, which reflected their position on the project. Key issues for directly affected landowners and neighbours were related to: project approvals, stock movement, lifestyle impacts, traffic and utilities

Many actions to mitigate or leverage project impacts were generated from the consultation program (discussed in Table 1). Most suggested actions addressed key issues raised in the consultation, such as: employment targets, visitor management and inmate support. It is important to note that some actions suggested through consultation had already been addressed, either within the EIS or through engagement with local partners and organisations. Other community suggestions have been incorporated into the amended mitigation table contained in Appendix 6.

The outcomes of the consultation will be used by Northern Pathways to inform future NGCC design, operations, process and implementation plans.

Table 1 Strategies Raised Through Consultation

Issue	Suggested mitigation by stakeholders community	Project Response
Visitors will need a safe place to rest and wait	A community hub set up outside the centre gates where visitors could go for support and programs, in partnership with local community services	This would be subject to ongoing discussions with Clarence Valley Council and other non-government organisations.
	Designated visitor accommodation offered nearby for families visiting, in partnership with local accommodation providers	No. Not recommended in SIA as not considered necessary.
	Fitting train and bus depots with charging stations for phones and devices	Visitors centre at NGCC has these facilities.
	Aligning visiting hours with train schedules to reduce wait times	Visits hours are flexible from 8.30am to 4.00pm Wednesday to Sunday..
	A facility at the centre for waiting visitors	Visits centre included in design.

Issue	Suggested mitigation by stakeholders community	Project Response
	Opportunities for alternative accommodation or subsidised hotels, particularly for Aboriginal visitors or visitors from low socio-economic backgrounds who are likely to depend heavily on stretched community services for short term accommodation	This is beyond the scope of the project. The Operator will be able to provide potential visitors with information on accommodation options if required.
	Facilities for low-income families visiting inmates.	This is beyond the scope of the project. The Operator will be able to provide potential visitors with information on accommodation options if required.
	Public transport stops allocated close to the site (Transport for NSW)	Bus stop included in design.
	Have better transport links with private shuttle buses or general assistance to travel	Yes. Included in project commitments outlined at section 6.
	Public art should be included in all public visiting areas within the correctional centre.	Yes. Public art included in proposed development.
The NGCC needs strong linkages with the community to reduce reoffending and, provide inmate support and release programs	Waiting areas for those being released inside the NGCC so they have flexibility to coordinate their release	Yes. Incorporated in operations.
	Coordinated transport options for released inmates. So those being released are not waiting for long periods of time to leave Grafton	This would be coordinated by NGCC in conjunction with Probation and Parole
	There should be more affordable housing, crisis accommodation and short term transitional housing stock to support newly released persons	This issue is discussed in SIA.
	Stronger rehabilitation programs and partnerships with community groups to manage released persons	Yes, included in operation and discussed in SIA.
	Stronger pre-notification of when people are being released so organisations can prepare	As above
	Focus on reducing drugs and alcohol addiction, and unlicensed driving to most effectively reduce reoffending	As above

Issue	Suggested mitigation by stakeholders community	Project Response
	Have courses that inmates can undertake to take money off their fines and reduce debt	Courses would be developed to meet the needs of inmates in line with Corrective Services NSW requirements.
	24-hour access at the site for legal services	Access available 7 days a week 8.30am to 4.00pm.
	Incorporate different rehabilitation models including Aboriginal healing models which require local specialists	Included in proposal.
	Create a mentoring program with Aboriginal Elders to aid rehabilitation	Yes. This will be considered as an option subject to further development.
	Provide audio-visual links for inmates to speak with legal services	Yes, this is included in the current design.
	Enact memorandums of understanding between the NGCC and local Aboriginal agencies, including Aboriginal Legal Services	Discussions are underway for agreements with a range of service providers.
	Work programs to assist inmates when reengaging the workforce	This is included in the proposal.
Employment targets need to be successfully implemented	Early communication with schools, Southern Cross University, TAFE and students about employment opportunities	Agreements and Structured Programs have already been under development with local TAFE / Training & employment providers.
	A coordinated process to offer long term employment to counter short term construction cycles, such as linking existing employees to work and early notice of the commencement and closure of jobs	Yes. Discussed in SIA.
	Money management training for young people so that they spend sustainably, learn to be financially resilient and don't go back to unemployment.	Yes. Included in proposal.
	Mentoring and employment support	As above
	Paperwork in place prior to the start of works for contractors and subcontractors	Appropriate arrangements in place.
	Inform local businesses early on of quantities of goods required so that they can pool resources or build consortiums	Yes. Included in mitigation measures.
	Incentives to get local people to create jobs	As above.

Issue	Suggested mitigation by stakeholders community	Project Response
	List the available jobs early on to encourage young people to stay in the area	As above.
	Utilise the business roundtable as a vehicle for disseminating business information	As above.
	Run industry specific cluster meetings run by Council	Mitigation includes active participation in Clarence Valley Roundtable
	Develop a public construction calendar with advanced notice of the skills and qualifications required and procurement packages	Yes. In mitigation measures.
	Publicise project team contacts	NorthernPathways contact information is publicly available.
	Have a standing committee and continue to keep communication channels open beyond just the onset of the project	Ongoing communication protocols are outlined in section 6.
	Avoid lengthy payment terms so local businesses with small cash flow can participate	As identified in the mitigation measures, a business model is recommended to be developed in collaboration with local businesses.
	Measures in place to make people prove their eligibility to meet local employment targets and Aboriginal employment targets	Not recommended. As discussed in mitigations measures a plan specific to the NGCC is to be developed to implement the operator's reconciliation action plan.
	Build a construction housing village for workers in town so money is spent there, if local accommodation is not possible	As discussed in the mitigation measures and SIA short term construction worker housing could be explored if required. No current requirement.
	Create a rental directory and liaise with existing accommodation providers to identify accommodation provisions for workers	As, discussed in mitigation measures a housing working group is recommended to be established.
	All NGCC employees should have cultural awareness training to improve relationships with inmates and work respectfully with Aboriginal staff	Yes. In mitigation measures.
The project should be environmental	Consult with the local quarries regarding concrete supplies	Project commitments outlined at section 6

Issue	Suggested mitigation by stakeholders community	Project Response
sustainable		recommend supporting local businesses opportunities.
	Use solar energy to power the site	This is discussed in the EIS.
	The site should be sustainable and powered by renewable energy	Discussed in EIS, provision has been made to accept site based renewable energy in the future.
	Review the thesis; Shotbolt, Timothy (2016) 'Unwanted lighting effects at night in Australia', for suggestions on best practice light spill to mitigate light pollution	The proposed lighting standards included in the development application are suitably engineered assessed and detailed in the EIS.
	Follow the Australian Standard (AS4282-1997) on the Control of the Obtrusive Effects of Outdoor Lighting	The appropriate standards are referenced in the current design and assessed in EIS.
The project needs to keep the community updated on the project and reach as many people as possible	Have a project Facebook page to connect with, and update the local community	Yes. As discussed in project commitments at section 6.
	Keep people informed along the way by email and word of mouth	Yes. As discussed in mitigation measures at section 6.
	Spread the word about consultation activities through the networks of interagency community organisations	Yes. As discussed in mitigation measures at section 6.
	Find local Aboriginal representatives that can speak for many	Mitigation measures recommend the establishment of an aboriginal cultural group engaging with local or high profile Indigenous leaders.
	Hold stakeholder meetings in surrounding areas which cover different traditional lands	Yes. Discussed in mitigation measures.
	Collect feedback from different Aboriginal Land Councils who will have their own perspectives or employment needs and opportunities	As above.
Have a road	Include a road sign for stock movements	Yes. This will be included in



Issue	Suggested mitigation by stakeholders community	Project Response
sign on Avenue Road saying, 'designated stock route'.	along Avenue Road.	the project.

2.3 Ongoing consultation

The Phase 2 engagement program has built the foundations for ongoing engagement and partnerships with stakeholders and local communities to keep participants updated and support the construction and operation of the NGCC.

3. CONSIDERATION OF SUBMISSIONS

During and after the public exhibition period 26 submissions were received by DPE. 19 of these submissions were from the public and 7 from public authorities.

Additional comments were received from DPE. These are also addressed in the table to Section 3 and in Section 4.

The submissions from public authorities made comments relevant to areas of their responsibility.

Of the nineteen submissions from members of the public, one submission supported the proposal, ten raised objections to the development in part or in whole and six submissions did not object outright yet nonetheless raised concerns or made comments for further consideration.

Two submissions in relation to the provision of HV electricity supply to the facility objected to the alignment of the supply along Reilleys Lane which is not part of the proposed development. However, INSW have advised that detailed investigations to identify a preferred route for the HV powerlines are continuing. It has been further confirmed that Reilleys Lane is not suitable and will no longer be considered. Once a preferred route has been confirmed, consultation will be carried out. A separate planning process has been undertaken for the HV supply route.

The following table and sections of this report presents a summary of the issues raised in the submissions made during and after the exhibition period and the proponent's response to the submissions.

Table 2 – Response to Submissions from the Public

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
P1	BF	>Lack of consultation for 'affected landholder'	We both state emphatically along with a significant number of other affected landholders that we have not been adequately or properly consulted. We were not consulted at all prior to the preparation of the EIS for Stage One or its approval on 14th March 2017. The invitation to our first face to face meeting with those representing the applicant was expressed thus: "We would like to meet you since we will be neighbours for the next twenty years." At that first and subsequent meetings we and others have raised issues that have not been described or addressed by the applicant in the EIS. There is general and genuine anger among some of the affected landholders at least that we have been treated with disdain, even contempt.	There has been on-going consultation with directly affected landowners and neighbours during the course of preparing the EIS and during the exhibition of the EIS. This is documented in Section 4.2.1 the report entitled <i>Engagement to Support the Development of Stage 2 EIS - NGCC Engagement Outcomes Report May 2017</i> contained as Appendix 25 of the EIS and in Section 3.4.1 of the report entitled <i>Phase Two EIS Exhibition Period Engagement Outcomes Report</i> dated August 2017 contained in Appendix 1 to this Response to Submissions Report.
P1	BF	>Aboriginal significance of the site	We and other local residents are aware that the site is very significant for Aboriginal people. When work commenced at the site on 3rd July 2017 and during the following day several Aboriginal people were present. Their message was emphatic and clear. Do not dig. It is clear that they have not been consulted. We submit that the applicant has simply not consulted adequately on this issue and that it is becoming apparent that the site is of major significance and importance in this regard.	Discussed in Section 4.1 below.
P1	BF	>Aboriginal significance of the site	If this gaol is built on a site that has been and continues to be a special and sacred space associated with a songline running from Susan Island to the floodplain and includes burial sites in close proximity to the gaol site and then on completion incarcerates over 400 aboriginal men and women into the foreseeable future then it will successfully have provided the greatest insult possible to every Aboriginal and Torres Strait Islander in the country and irrevocably prejudiced any advance in the quest for Reconciliation that may otherwise have been possible.	Discussed in Section 4.1 below.
P2	DB	No clear indication	It was not possible to understand the grounds for objection raised in this submission.	No response provided.
P3	DR	> Local resident and proximity to NGCC	> I have only just looked at the pics provided for the Buffer Zone, I don't like it. It closes our view to nothing but a wall of trees. My request was that the trees be put closer to the jail to retain as much as possible of the current outlook as my house was built to look over that paddock.	The proposed vegetation buffer is a requirement of the Stage 1 consent and is being implemented as part of the Stage 1 works. NorthernPathways have agreed a planting design and layout with a Landscape Consultant & designs have been implemented by meeting with these neighbours on their suggested details of planting location to maximise outlook whilst providing privacy and minimising visual impacts.
P3	DR	> Tree planning reducing outlook over paddock and creation of problem with snakes	> And due to the size and how close it is to my house it would present me with the problem of snakes. We have not had much problem with snakes previously as the paddocks were kept clear and grass was short.	The majority of the site would be maintained and grass mown or slashed with the exception of the vegetation buffer.
P3	DR	> Safety for family, requesting additional security measures for the property	>I stated from the start that safety is our priority. For myself as a single person with children. The view matters, but isn't such a high priority to us. So, I request that the money would be better spent on safety features for my house to help keep us safe from any unwanted visitors. IE: Entry, Crim Safe Screens/Doors and safety glass, reinforced door jams/locks etc.	Noted and NorthernPathways will hold on-going discussions during project delivery. Discussions have commenced with the neighbour in this regard.
P4	GW	> Concern regarding management practices of Serco.	> Serco - Operators selected by NSW State Government for 20 years. Do you think they would be suitable operators given the fact they were terminated from Mt. Eden Jail in New Zealand and recent television interview with Minister Dutton revealed they are under federal investigation for mismanagement and corruption within the Christmas Island Detention Centre.	Serco successfully operates a number of correctional centres across Australia, New Zealand and the UK including the Wandoo Reintegration Facility in Perth, which is unique in Australia for its integrated services which is achieving recidivism rates better than half the national average. Throughout the procurement process, Serco were required to demonstrate how they have made systemic and holistic changes in the way they operate their correctional centres in response to previous incidents at the Mount Eden

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
				Corrections Facility. Serco continue to run the Auckland South Corrections Facility and reference checks with the New Zealand Government confirmed that this centre is run safely and efficiently with no concerns about Serco's ability to operate a correctional centre. Serco as part of the Northern Pathways consortium will be subject to rigorous performance reporting and benchmarked standards to ensure efficiency and productivity is lifted, without compromising safety and security. The Northern Pathways proposal provides a state-of-the-art facility that not only focuses on safety and security but will provide innovative programs to help reduce the risk of re-offending.
P4	GW	>Location of site in relation to flooding	> Centre is in high rainfall area where cyclones and high rainfall can be in excess of 250mm. How do you think you can contain runoff and wastewater within your area. Your assumptions concerning irrigation, particularly during wet periods are rubbish.	The EIS states that the overall stormwater management concept is to ensure that post development stormwater runoff volume and peak rate of flow from the site matches pre-development runoff within each of the existing drainage paths leaving the site for the 5, 10, 20 and 100 year ARI events. The large detention basins are sized to meet these requirements. The modelled irrigation scheme resulted in complete reuse on-site, allowing for irrigation flexibility and management of very rare events, with no increases in nitrogen and phosphorous leaching, due to uptake by the crop and overcoming some nutrient deficiencies present in the non-irrigated crop.
P4	GW	>Wastewater and sewage disposal and proximity to proposed sewage	> Wastewater and sewerage disposal - We were told by our local member of Parliament the sewerage would be pumped to the South Grafton Treatment Plant. This has not happened, we were lied to.	Connection to Council's existing Clarenza treatment plant was considered in the Stage 1 EIS which states that due to the distance from the Council's sewerage system, a rising main transfer is not feasible as the detention time in the rising main would mean that the current treatment train would be unable to treat the sewage. This was confirmed during Stage 2 investigations. This alternative is also discussed in Section 1.6 of the EIS.
P4	GW	>Wastewater and sewage disposal and proximity to proposed sewage	> Wasterwater Plant - My property is on the Western side with 3 approximately 40ha Lifestyle Blocks with house sites approved. Your proposed plant is close to these sites. What a bastard of an act for you to do to your neighbour. What is the minimum distance a sewerage plant has to be away from a house site. 3.10.7 - You state in your EIS the wastewater dam when full can discharge waste on the western side by drainage lines (gullies). My property is on the western side and I don't want any of your wastewater discharge.	The site of the water treatment plant is approximately 250 metres from the western boundary of the site adjoining what is assumed to be one of the 3 x 40 hectare lifestyle lots referred to in the submission. There are no dwellings located on these lots and the less timbered areas to the south of these lots closer to Wants Lane (to be relocated as part of the Pacific Highway upgrade) would be the likely location of any dwelling. These locations would be well removed from the location of the water treatment plant by approximately 800 metres. Discussions have been held with Council officers who advise that no development consent has been granted for dwelling houses on these lots.
P4	GW	>Livestock movement along Avenue Rd, with secure fencing at entry points.	> Stock Movements - Graziers use Avenue Rd to drive livestock under license from property to property and particularly during flooding where livestock are moved in many and large mobs from the flood prone land to the north to higher ground via Avenue Rd. The present boundary is securely fenced. Your proposal is for large open driveways. This proposal is unacceptable to me as a grazier. I would expect gates to be put on the entrance and kept closed.	Stock movements discussed below in Section 4.3.
P4	GW	> Traffic movement to the NGCC and capacity for road network to cater for the increased traffic and potential increase in road accidents	> Roads - there are 5 roads in the area. They are Eight Mile Lane, Avenue Road, Wants Lane, Old Six Mile Land and Deep Creek Road. Your preferred route is Eight Mile Land and part Avenue Rd (currently being upgraded). Old Six Mile Rd (Part bitumen, part gravel, poor state), Wants Lane (gravel, poor state), Deep Creek Rd (narrow, single lane bitumen road, average to poor state). Given you have a preferred route to this jail, how do you propose to prevent jail traffic using the other low standard roads as they are public roads and will no doubt cause accidents. How do you propose to the police to manage this situation?	<p>During construction, workers and deliveries will be directed to use Pacific Highway and Eight Mile Lane as the access route to the facility.</p> <p>During operation staff, visitors and deliveries will be similarly directed to use this route. The Pacific Highway upgrade will be completed by the time the facility opens. The quickest and most direct route to the site would be via the Glenugie interchange of the Pacific Highway and Eight Mile Lane. Staff living in the southern part of Ulmarra or the village of Tucabia to the north may use local roads rather than access the Pacific highway bypass at the Tyndale interchange at Sheehys Lane although this is expected to be minor.</p>

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
P4	GW	> Impact on farming practices (and the ability to continue baiting and shooting of wild animals)	> Feral Animals - They are a problem in this area particularly wild dogs (which kill cattle), foxes and rabbits. The methods of control are baiting and shooting. The law states you cannot bait within 500m of a building. Your jail buildings are less than that from my boundary. The other method is shooting, what is your policy about discharging firearms near a jail?	<p>It is anticipated that the proposed development would not unreasonably impact on farming activities on adjoining or adjacent land undertaken within the law controlling use of firearms, guidelines of the Department of Primary Industries and sound farming practice. The generally smaller lot size in the area including the lifestyle blocks mentioned in the submission would need to be considered in relation to any off site impacts of farming activities.</p> <p>A primary production firearms licence does not extend to shooting on any other property.</p> <p>There would be restricted access to the site and in particular the areas on the western side of the site which would not be accessible to visitors. The operator, Serco, is willing to hold discussions with all adjoining landowners to ensure that impacts on on-going farming operations are minimised.</p>
P4	GW	> impact of the perception of Grafton being a gaol town and potential increase in crime to the area	> As a neighbour and I have lived in the Clarence Valley all my life, I am totally opposed to this jail being built on this site, and the fact Grafton will possibly be turned into a jail town and the possible crime it could bring to the area.	Noted. Impacts of the development on the image of Grafton is discussed in the SIA accompanying the EIS.
P5	JW	> Lack of consultation	> There was no consultation with us. The Pacific Highway and Grafton Bridge spent years and had 4 different location options put out to the public to comment on. We did not have that option were just told the site has been selected. The first EIS was fatally flawed because it did not comply with the requirement to consult with us and without any research done on our concerns contrary to a requirement of the SEAR's.	There has been on-going consultation with directly affected landowners and neighbours during the course of preparing the EIS and during the exhibition of the EIS. This is documented in Section 4.2.1 the report entitled Engagement to Support the Development of Stage 2 EIS - NGCC Engagement Outcomes Report May 2017 contained as Appendix 25 of the EIS and in Section 3.4.1 of the report entitled Phase Two EIS Exhibition Period Engagement Outcomes Report dated August 2017 contained in Appendix 1 to this Response to Submissions Report.
P5	JW	> Potential conflict of interest for selection committee member	> A relative of a local land holder was on the selection committee. We were told he backed out due to conflict of interest but we think it may have been after selection was almost made.	Noted. Site selection discussed in the Stage 1 EIS. Development consent has been granted to the concept proposal for the NGCC to accommodate 1,700 inmates.
P5	JW	> Cost and environmental impacts of infrastructure	> Cost and environmental impacts of infrastructure (electricity line, water, easements) to 'those' land holders. Choice of other sites may have eliminated these costs.	<p>As stated in Section 1.4 of the EIS, the NSW Government is responsible for site acquisition and the provision of certain public utilities infrastructure to the site (including all relevant environmental approvals). These include:</p> <ul style="list-style-type: none"> · The upgrade of Avenue Road to a two lane carriageway from the bridge over the Pacific Highway Grafton bypass to the northern boundary of the site; · The provision of a potable water supply to the site from the municipal service operated by Clarence Valley Council (CVC); · The provision of an electricity supply to the site to meet the needs of the development; · The provision of communications to the site. <p>These works have commenced and are being coordinated with the Stage 1 works.</p>
P5	JW	> Jobs should be given to locals	> Jobs should be given to the locals. We were told in one of the meetings with John Holland that they are planning on putting a concrete factory on site to make their own concrete. Whatever happened to using locals where possible. We have a facility to provide concrete.	Proposals for employing locals during construction and operation are described in the EIS including Appendix 24 - Social Impact Assessment. The concrete batching plant would involve jobs on site. NorthernPathways will work with local service providers to maximise opportunities for local involvement.
P5	JW	> LEP requirements aren't met	> LEP requirements aren't met (increased traffic; out of character with its surroundings; noise; air pollution). The new facility will be changing the look of our surroundings and with a possible 300 cars per visiting time it dramatically increases traffic, pollution and noise.	The extent to which the development addresses the provisions of the LEP are discussed in Section 5.5.8 of the EIS.

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
P5	JW	> Local roads are not suitable	> Six Mile Lane and Wants Lane are too narrow for large machinery. During flooding these roads are impassable. These issues should have been addressed in consultation with land holders before approval was granted.	It is proposed that all construction vehicles carrying machinery or other supplies would access the site via Eight Mile Lane and Avenue Road. Large machinery involved in the operation of the facility would also be instructed to use this route. The Construction Traffic Management Plan prevents use of Six Mile Lane.
P5	JW	> Loss of land value	> There is a lot stress to us on every problem created by NGCC. Not addressed not acceptable. We feel our life has been turned upside down. We moved to Glenugie (as you call it Lavadia) to get away from the fast pace life of Sydney, the pollution and the noise. We now feel it has just been dumped on us. Our little part of the North Coast. With the highway and possible threat of a gas mine and now the Goal it is turning our little piece of paradise into an Industrial area and we cannot afford to move because we have lost value in our home. It is too expensive to move and start again. Maybe one day if the government rezones lands and lets us subdivide then maybe we will be able to afford to move and live out our life in the piece and quite that we once had. Recommendation - rezone area into small acreage blocks so we can subdivide. This also allows for housing to be built for the goal workers and allow investors to build housing for rent to relatives of imprisoned family members which will eliminate extra stress on the roads.	There is no proposal to turn the area near the site into an industrial area. Land on the southern side of Wants Lane would be separated from the site by the Pacific Highway. Any changes to land use planning in the area is a matter for Clarence Valley Council and the Department of Planning and Environment in the context of State and regional planning strategies.
P5	JW	> Aboriginal heritage concerns	> Women are not allowed on the site according to the Aborigines yet Serco is going to have 100 indigenous women who may find this extremely distressing and threatening.	Discussed in Section 4.1 below.
P5	JW	> Biodiversity	> Biodiversity offset has been skipped over in stage 1 and 2. Waiting for Stage 3 is too late.	The Biodiversity Offset Strategy has been revised and approved by the Secretary of the Department of Planning and Environment as required by the Stage 1 consent. This outlines the proposed offset strategy. This strategy will be finalised to reflect the offsets required by the Stage 2 development.
P5	JW	> Parking	> The EIS talks about a 500 car park but the application says 850.	The Stage 1 consent for the concept for the development included 500 car parking spaces identified at that time to meet the needs of the development. 850 car parking spaces are provided to meet the estimated need of staff and visitors to this facility. This is based on detailed investigations on parking requirements and the traffic, access and car parking investigations required by condition B5 to B8 of Schedule 2 of the Stage 1 consent.
P6	JC	> Impacts of NGCC on cattle movements	> Stock numbers on these properties change from season to season, large numbers of cattle can be held on these properties, that would potentially lead to movement of these cattle along Avenue Road at any one time.	Discussed in Section 4.3 below.
P6	JC	> Impacts of NGCC on cattle movements	> We believe that the traffic impact from the correctional centre in full operation of 714 vph equating to 11.9 vpm and whilst under construction of 905 vph equating to 15 vpm as quoted in the environmental impact statement under Transport and Accessibilities section 6.4.2 page 106-108, would make it impossible to drive cattle past the correctional centre and along Avenue Road.	Discussed in Section 4.3 below.
P6	JC	> Impacts of NGCC on cattle movements	> We believe that the Stock Movement Protocol that has been proposed by John Holland is drastically inadequate to facilitate any cattle movements along Avenue Road as cattle movements can take multiple hours to complete. Cattle can be unpredictable when working with them and we believe that there are not enough safety interventions and procedures that can be put into place for unforeseen circumstances that may arise to keep both cattle and the public safe.	Discussed in Section 4.3 below.
P6	JC	> Impacts of NGCC on cattle movements	> We are concerned that due to the amount of traffic proposed in the Environmental Impact Statement, that the Department of Local Land Services may not renew and or possibly revoke our current or future permits due to safety concerns of the public.	Discussed in Section 4.3 below.

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P7	JG	> Lack of consultation	> As a resident of 195 Avenue Road Glenugie, I would like to submit some positive and constructive improvement ideas for our community. Without prior consultation, the Department of Planning and Infrastructure NSW chose our rural community as the location for a 1700 bed correctional facility despite there being no power or water to support such a facility.	There has been on-going consultation with directly affected landowners and neighbours during the course of preparing the EIS and during the exhibition of the EIS. This is documented in Section 4.2.1 the report entitled <i>Engagement to Support the Development of Stage 2 EIS - NGCC Engagement Outcomes Report</i> May 2017 contained as Appendix 25 of the EIS and in Section 3.4.1 of the report entitled <i>Phase Two EIS Exhibition Period Engagement Outcomes Report</i> dated August 2017 contained in Appendix 1 to this Response to Submissions Report.
P7	JG	> Loss of amenity	> Now through no fault of our own we have had to undergo a series of changes. Our area has gone from a private and quiet rural setting with very little traffic, to a very busy, noisy and unpredictable main thoroughfare right at our front gate. This will continue to deteriorate as the facility gets up and running.	Traffic volumes on Avenue Road are outlined in the EIS accompanying the development application. The existing carriageway will be widened to 2 lanes at the submitter property by Pacific Complete as part of the Pacific Highway upgrade project. Traffic flows would be highest during the morning peak period with the change in shift. Traffic flows at other times would be lower. Noise impacts from additional traffic during operations have been assessed as minimal.
P7	JG	> Cleared land	> With work already well under way on the corner of Eight Mile Lane and Avenue Road, (southern end) the first issue is the amount of trees cleared from the Avenue. I would like to see the area regenerated with fast growing screening trees so that in three years' time, we have a barrier from noise and light. For residents who wish to have an extra barrier between their properties and the road, trees should also be planted inside their fence line to further screen from noise, light and for privacy.	The Proponent will work with the submitter regarding vegetation buffers.
P7	JG	> Employment of local labour	> Another suggestion is that residents from this community be employed by the facility first and foremost, as this will certainly assist in shoring up support from them. Not just in the construction phase but also on-going employment within the facility.	Residents of the local area can seek employment during the construction and operational phases of the development with applications considered on their merits. NorthernPathways have targets for local employment during construction and operation with tailored training during construction that will enable transition into the Operational phase. The NorthernPathways website enables residents to register interest in employment. Jobs fairs are planned.
P7	JG	> Employment of local labour	> I would also like to know if you can guarantee that the Avenue Road will be the main access road to the facility. To make the best of the situation, I have considered investing in a business that may profit from the passing traffic. Can you also guarantee that there will be no on-off ramp from the highway to the facility for the convenience of transporting inmates? If so, can residents have access to this ramp?	No off ramp from the highway is proposed as part of the development with such work being the responsibility of RMS.
P8	KH	>Lack of consultation	> Firstly, I would like to express my disappointment with the lack of direct notification to my family and I about the planned works that directly affect all Reilleys Lane residents. I hope that from now you and your team could be more forth coming with any information regarding any changes affecting our neighbourhood.	The provision of electricity to the facility is the responsibility of INSW and is subject to a separate approval process. Detailed investigations to identify a preferred route for the powerlines are continuing, however it has been confirmed that Reilleys Lane is not suitable and will no longer be considered. Once a preferred route has been identified, consultation will be carried out with impacted landowners.
P8	KH	> Upgrade and redirection of power lines	> Although we are objecting to your proposal we are open to options and possible compensation options that could result in a fair decision for all involved.	See comment above
P8	KH	> Upgrade and redirection of power lines	> We have listed below the concerns we have in regard to this matter followed by a list of options. Concerns <ul style="list-style-type: none"> - Destruction / clearing of natural vegetation - Property access during works - Road congestion/delays - Dust/noise pollution levels - Power outages - Changes to the street scape - The potential for upgrades in the future - Possible 'humming' from the lines 	See comment above

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
			<ul style="list-style-type: none"> - Family and livestock security/wellbeing (health issue?) - Decreased property values 	
P8	KH	> Upgrade and redirection of power lines	<ul style="list-style-type: none"> > Options - Choosing alternate route - Making the new goal self-sufficient with solar/wind power - Placing all existing and new lines underground - Re-surfacing Reilleys Lane with bitumen 	See comment above
P9	MS	> Concerns about crime prevention within and round jail premises	<ul style="list-style-type: none"> > Contradicts a number of existing design principles for Australian Criminal Intelligence Commission. For instance: <ul style="list-style-type: none"> - Understanding of the Clarence Valley picture of drug use and demand in the present-day and as it evolves in future, is fundamental to social impact of new Grafton Correction Centre. - Independent and transparent wastewater monitoring is essential to understand patterns of illicit drugs usage, like ice, cocaine, MDMA (ecstasy), alcohol, tobacco and medications. - Drugs usage by an ample percentage of 1,300 maximum security inmates at new Grafton Correction Centre, won't be constrained by gaol security surveillance (and irrespective of gaol rules or NSW laws). 	State of the art security measures will be in place at the facility including a range of electronic surveillance measures.
P9	MS	> Concerns about crime prevention within and round jail premises	> Puts CASA (Civil Aviation Safety Authority) in a very difficult if not impossible position (how can CASA predict ahead of time how inmates will guide future clandestine drone flights).	State of the art security measures will be in place at the facility
P9	MS	> Concerns about crime prevention within and round jail premises	> Dampens/confuses ethical consideration signals and is a significant risk for future investment into artificial intelligence and autonomous systems which guide drones	including a range of electronic surveillance measures.
P9	MS	> Concerns about crime prevention within and round jail premises	> Creates significant "Intentional Human Acts" risk for some Clarence Valley Council residents. If Environmental Impact Statement is accepted (even with my strong objection) then to avoid serious lifestyle disruption there should be an unimpeded ability for the affected residents to obtain immediate compensation.	State of the art security measures will be in place at the facility
P10	MC	> Impact of high voltage power lines on flora and fauna	> The flora and fauna will suffer extreme disturbance, due to the tree/land clearing that will be required for construction of the proposed power lines.	The provision of electricity to the facility is the responsibility of INSW and is subject to a separate approval process. Detailed investigations to identify a preferred route for the powerlines are continuing, however it has been confirmed that Reilleys Lane is not suitable and will no longer be considered. Once a preferred route has been identified, consultation will be carried out with impacted landowners.
P10	MC	> Impact of high voltage power lines on flora and fauna	> The bird habitat is extensive and includes king parrots; rosellas, coucal pheasants, wrens, sulphur crested cockatoo, kookaburras, lorikeets, honey eaters, native quail, diamond doves, willy wagtails, swifts and many more native bird habitat/nests. Flora species include old established spotted gum present for hundreds of years, which provide shade and habitat for the fauna. There are also tuckeroos, wattle and ground cover species for smaller native animals.	See comment above
P10	MC	>Loss of local character	> Reilleys Lane is a microcosm of a unique natural environment that is encompassed by large agricultural tracts, a veritable oasis of refuge for animals and plants that have been removed from much of the surrounding local area. We, as residents have chosen to live in Reilleys Lane for the very values that will certainly be destroyed if the power lines are to be constructed.	See comment above
P10	MC	> Health impacts of power lines on humans	> This proposal is threatening to impact immeasurably on our native wildlife and plants, on our homes and lifestyle, property value/resale potential, long term effects of traffic and the proven adverse health effects (a UK study found that children who lived close to high voltage power lines at the time of their birth (within 200 m) had a significantly higher (1.69 times higher) chance of developing leukaemia than those who lived further away) of high frequency power lines to humans and native animals. To be informed that we will be potentially surrounded by' and living with hideous and hazardous high frequency power lines, go against all the reasons we live here.	See comment above

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P11	RT	> Difficult to access documents and errors in URL	> The EIS is published online in 92 separate documents, this makes reviewing the document very difficult. I have specific interests & require to search for keywords this has been made very difficult. Many of the residents effected by this development do not have the skills or resources to consider the document in this form. They have been effectively excluded from the process. There are many ways this document could have been made available as a single document it is disappointing that as part of public consultation, the effort was not made.	The number of files on the DPE website is determined by the file size capacity limits of the DPE. Hard copies of the development application including the EIS were available at the following locations: Clarence Valley Council (Grafton and Maclean Customer Service Centres), Grafton Library, Grafton Community Centre and Department of Planning and Environment, Grafton. A summary document was made available and drop in sessions with technical experts were advertised for people to ask questions of the project team. Further, detailed engineering, and technical based presentations were made to involved Agencies (such as Clarence Valley Council).
P11	RT	> Difficult to access documents and errors in URL	> In the document New Grafton Correctional Centre Stage Two Environmental Impact Statement Summary June 2017. page 2 footer states an incorrect URL as a source for the impact statement, it is difficult to understand how this could have happened with even the most cursory of proofing. This again frustrates public comment on the document.	The development application was formally notified by DPE in accordance with its policies and procedures.
P11	RT	> Lack of access to John Holland documents	> Throughout the document, many In house John Holland documents are cited, John Holland refuses access to all of these documents. This lack of transparency makes informed comment impossible. It is appreciated that some documents would need to be kept confidential but this carpet embargo on all documents is inappropriate. Documents relating directly to the community should be available to the community. To invite comment without transparency appears insincere & is insulting to the community. Being a PPP project the consortium has no FOI or GIPA responsibilities, this allows the consortium to operate without any public scrutiny.	Some of the John Holland Management Plans in the EIS reference other plans within the JHG Integrated Management System (IMS). The IMS contains a whole suite of policies, plans and procedures to cover all aspects of project design and delivery. All documents relevant to the project were included in the EIS.
P11	RT	> Lack of consultation with locals	> EIS information sessions were held at Grafton, Yamba & Woolgoolga. No session was held in the area surrounding the project this again makes informed comment difficult. Alarming that the people most directly affected were ignored. Yamba & Woolgoolga markets are tourist events, Yamba & Woolgoolga will not be impacted by the project why would displays be held here?	Extensive consultation was undertaken during the preparation of the EIS and during the exhibition as indicated in Appendix 26 of the EIS and in Appendix 1 to this report. This included consultation with landowners and residents near the site.
P11	RT	> Loss of land value > Inappropriate comparison to existing jail.	> The EIS states that expected effect on land values would be minimal & quickly recover. People purchase property here exclusively for the lifestyle & environment, the development will have a huge impact on the number of prospective purchasers & what they are prepared to pay, the project will have a huge impact on land values. The EIS drew its conclusions from discussions with local real estate agents. These agents have a vested interest in the land values being as high as possible, they are not in any way independent. An independent expert valuer should have been consulted	Impacts of the development on land values were raised during the consultation program and have been addressed in Appendix 24 of the EIS. This issue was also addressed in the determination of the Stage a development consent. The Department acknowledged the <i>issue raised in submissions received from the public regarding the risk to property values as a result of the proposed project. However, it is an established principle that the impact of a project on surrounding property value is not a planning consideration (refer e.g. Trinvass Pty Ltd and Anor v Council of the City of Sydney [2015] NSWLEC 151, [89]).</i>
P11	RT	> Loss of land value > Inappropriate comparison to existing jail	> The EIS compares the NGCC with the existing Goal, stating that Grafton has had a Goal for 120 years with little impact. Residents around the existing goal purchased property there knowing there was a goal already there & they took benefit from the lower real estate prices, depressed because of the goal. The existing goal is in a suburban environment. It is inappropriate to draw parallel between the two they are totally different.	Noted. The familiarity of the community with correctional centres was raised frequently during the consultation process.

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P11	RT	> Potential for increased visitor violence in Grafton	<p>> Locally one of the most frequently expressed concerns is visitor behaviour. The conclusion reached in the EIS is both counter intuitive & historically inaccurate. The conclusions conflict diametrically with actual community experience. It is alarming to consider how such conclusions could have been reached with a thorough, prudent methodology. Rather than address a real community concern the EIS trivialises the concern.</p> <p>Local residents of Grafton & surrounds are long aware of the visitor behaviour around the old Grafton Goal, that included Frequent violent incidents at the Albion hotel</p> <p>It is reasonable to presume that similar behaviour will occur at Woolli Hotel Theft , vandalism & assaults at nearby businesses specifically the Butchers shop & Albion service station.</p> <p>Theft, vandalism & assaults at Grafton hospital to both the hospital property, staff & visitor vehicles, harassment of staff & patients</p> <p>Local residents were fearful of walking in their neighbourhood & they were concerned for the security of their property. There were many confronting incidents</p> <p>Police records would confirm, frequent call outs to the Albion Hotel</p> <p>The owners of the Hotel, service station & Butcher could be interviewed.</p> <p>Long term local residents could verify their harassment.</p> <p>Hospital records & staff interviews would provide a true picture of the environment that surrounded the old Grafton Goal.</p>	Discussed in Section 4.1 below.
P12	PGH	> Livestock movement along Avenue Rd	<p>> The movement of their cattle along Avenue Road is critical to the viability of their cattle business. The location of the proposed New Grafton Correctional Centre dissects our client's properties. With the upgraded infrastructure and additional traffic expected on Avenue Rd the walking of cattle along Avenue Road will become unviable due to safety concerns, additional expenses and the inability to get cattle to walk over a newly created highway overpass</p>	Discussed in Section 4.3 below.
P12	PGH	> Livestock movement along Avenue Rd	<p>> Our clients move cattle on average fortnightly, but occasionally weekly on the northern end of Avenue Rd and to and from the southern end of the property on average every three to four weeks. Each movement takes about 3 to 3.5hrs from the southern end of the property to the northern properties to complete. It currently takes 3 people in cars and on horseback and 2 working dogs to move about 50 head of cattle at a time. currently our clients are able to walk their cattle at time and date that is suitable for them which gives them maximum flexibility to run their business.</p>	Discussed in Section 4.3 below.
P12	PGH	> Livestock movement along Avenue Rd	<p>> It has been suggested that future movement of cattle along Avenue Rd will require notification to a designated supervisor at least 24-48 hours in advance. The designated supervisor will arrange for traffic controllers to stop the flow of traffic in either direction whilst the cattle are moved along the road between properties. Given that this movement takes between 3 and 3.5h hours to complete we haven't been advised what the procedure will be in the case of an emergency at the correctional centre, where emergency services are required to attend or leave the facility.</p>	Discussed in Section 4.3 below.
P13	SF	> Money into education rather than incarceration	<p>> INSW should be spending money on more schools and community facilities that will teach children, their parents and grandparents how to be a worthwhile contributor to the community. It is cheaper to educate than to incarcerate. Stop the cycle of crime by investment on prevention not punishment.</p> <p>Privatising gaols is just dumb. They don't work. According to some of my research the private gaols are being dumped in other countries for various reason--mostly health and safety to the guards and inmates (club fights and contraband inside the gaol).</p> <p>The policies sending people to gaol need an overhaul. People who are addicted to drugs and alcohol need to be in a rehab hospital that keeps them there until they are cured of the addiction and not in gaols. People who are never convicted of a crime or found guilty should not be kept in gaol. Bail laws have become so tight that people are in gaol who shouldn't be.</p>	The justification for the development is discussed in Section 1.7 of the EIS. The development is required to provide accommodation to meet the significant growth in short and long-term demand for capacity within the NSW corrections system. There has been a strong growth in the number of persons in custody. The NSW prison population reached 13,000 in March 2017, not counting prisoners held in police cells. This growth has exceeded expectations and predictions of short term and long-term population growth published as recently as May 2015. This brings the total increase in the NSW adult prison population over the last two years to 13 per cent. The development is a primary action under the NSW Government's Prison Bed Capacity Program, which seeks to increase bed numbers through a range of options in the NSW prison system to

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				accommodate the immediate and estimated long-term demands. The design and construction of a new facility to suit modern correctional practices will facilitate the implementation of the CSNSW program for Better Prisons including improved educational outcomes for inmates and a reduction in the rate of reoffending.
P13	SF	> Site inappropriate	> The site on Avenue Road for the NGCC should never have been selected. There was no consultation. The new Pacific Highway and new Grafton bridge spent years consulting the community about options and feasibility. The site on Avenue Road, Lavadia (Glenugie) was NOT on an original idea on any list of options. The council had a list of places they owned that were overlooked. Those council owned sites would have had fewer problems and costs with hook up to water, electricity, sewer etc. Connecting all these infrastructure facilities out to Avenue Road is costly and means clearing more corridors much to the disapproval to more landholders and wrecking habitat for flora and fauna. There was no consultation! INSW and Northern Pathways should not be able to get away with that!	Justification for the site selection was considered in granting the Stage 1 consent.
P13	SF	> Aboriginal heritage	> The gaol site on Avenue Road has significant meaning to Aborigines- yet Holland Construction Co. is going ahead with bulldozing and fences this very minute without caring.	Discussed in Section 4.1 below.
P13	SF	> Amenity Loss	Holland and Serco do NOT have a good record for honesty and morals. Holland (cutting corners no doubt) has asbestos (from China no doubt) in a Children's Hospital in WA. How can we trust them not to cut corners or that they will abide to Australia's construction laws? Some Serco private gaols around the world that have been reviewed and found to be treating the staff and the inmates in a manner that is unhealthy and unsafe.	These matters have been addressed by the Stage government in appointing NorthernPathways to the project.
P13	SF	> Amenity Loss	The 2nd EIS has noted that we directly affected local landholders will experience negative impacts as a result of the NGCC. Light, noise, traffic, property value, agriculture activities, loss of peace and quiet, loss of personal safety and farm safety and a negative impact on sensitive eco-systems. Also, its looks are going to be abominable compared to the view we have now without it.	These matters and appropriate mitigation strategies have been discussed in the EIS.
P14	TM	>Justification	> I believe a wholistic approach is vital to recovery and rehabilitation in correctional centres, so as to minimise re offending and helping to break the cycle of crime. Wholistic meaning the physical, emotional, spiritual & mental health of the individual. Meaningful daily work e.g. growing & maintaining vegetable gardens & tree planting & garden maintenance would be beneficial. A well stocked library with a range of books including self-help, nutrition for good mental & physical health, Bibles & spiritual health books. Social & recreational facilities, as many have been socially withdrawn, lonely & abused. Regular counselling visits are an important part of rehabilitation. Suggest limited use of medication for mental health, except when absolutely necessary. Provision of natural therapies to assist with depression & anxiety, rather than medication.	The justification for the development is discussed in Section 1.7 of the EIS. A range of educational and vocational training programs would be provided with dedicated spaces for programs, learning, studying and employment inside the facility. These programs will help foster positive lifestyle changes, develop capable citizens and facilitate successful community reintegration. The New Grafton Correctional Centre will have a significant focus on rehabilitation and the reintegration of inmates into the community. Importantly there will be a range of different programs to meet the needs of the different inmate cohorts. There will be programs that reduce dependencies and addictions; build life skills; reactivates association with family and community; encourages education and work-readiness; and importantly, challenges the behaviours that led to reoffending in the first place. Vocational Education and Training (VET) programs and industries will be available and help develop Inmates' work ethos and employment skills, with programs focused on in-demand skills within the community. NGCC is specifically designed with dedicated spaces for programs, learning, studying and employment inside the facility.
P15	Yaaringay	> Aboriginal Heritage	> We Yaaringay are a family company, formed to protect our heritage and cultural ancestry. Being indigenous and born locally as our grandmother her grandmother before her and so on, we are from a strong blood line of traditional people, our family live from the swamp with native birds on the menu regularly, only men go to the swamp because ceremony grounds are nearby on proposed prison premises	Discussed in Section 4.1 below.

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			(there is said to be 4 bags of stones yet to be unearthed on site). Observations tell me artefacts could be walking off the premises already. Ceremony ground should NOT be unearthed for multiple reasons- # ceremony grounds give meaning to the landscape and support beliefs as they are all interwoven it's culture. # your disturbing the spirit of ancestry # this interferes with Dreaming- collectively # it's disrespectful- like destroying a temple. # it's mens area -no women allowed # upset county (Makes people sick) # tormenting for staff (suicidal tendencies) # you unsettle the earth- it's a curse # guaranteed trouble on premises. (100%) # desecration for incarceration is bad karma.	
P15	Yaaringay	> Change of site	Is this common practice to build Gaols on ceremony grounds?	Discussed in Section 4.1 below.
P15	Yaaringay	> Change of site	The budget was for 600 beds why all the changes?	The Stage 1 development consent is for 1,700 inmates. In June 2015, the NSW Government announced that a new prison accommodating 600 inmates would be built in Grafton. In February 2016, the NSW Government announced that the project had been expanded to accommodate 1000 inmates to meet the State's increasing inmate population. A further 700 beds in the prison were funded as part of the NSW Government 2016-17 budget.
P15	Yaaringay	> Change of site	Is this government protocol?	The size of the facility has been nominated by the Government.
P15	Yaaringay	> Change of site	What is the total footprint. I mean the total footprint?	The footprint of the buildings is shown on the plans of the proposed development included in the EIS.
P15	Yaaringay	> Change of site	Are public aware some advertisements of meetings were incorrect?	All meetings were held as advertised
P15	Yaaringay	>Aboriginal Heritage	How did this become Yaegl country it's supposed to be part of the Gumbaynggirr Nation?	This issue was considered in determining the Stage 1 DA and is discussed further in Section 1.
P15	Yaaringay	>Aboriginal Heritage	> From white people point of view- If a person was to sit and read all the research, they would almost be crazy...the land was acquired by compulsory acquisition by Mayor Williamson (great). Did the land owners have any warning? all seems a bit suspicious to us what was wrong with the acmena. That was the plan remember? In the beginning, there would have been heaps of objections, I'm guessing that if they knew exactly what to say in the first place- they would have said it rather than just making a so called comment, the neighbours would NOT be happy, lots of locals wouldn't be happy. The animals wouldn't be happy. Has the DA been approved? because it shouldn't be.	These matters were considered in granting the Stage 1 consent.
P15	Yaaringay	> Flora and Fauna	> NIGHTIME-There are different species of nocturnal animals that are in the zone of destruction some are rare and endangered. Koalas, few types of bats, gliders, spotted quolls, different owls, possums and types of frogs, geckos and a lot more. A rare and favourite night animal is the phascogale. The glow of light created by the Correctional Centre is astronomical and would affect these animals.	The biodiversity impacts of the proposed development have been assessed as part of the Stage 1 DA and the Stage 2 DA. Biodiversity offsets are proposed.
P15	Yaaringay	> Flora and Fauna	> DAYTIME-Birds like honey eaters, bee eaters, fly catchers, the speckled warbler, tree creepers, varied sittella are some our father has shown us as children telling us they live there, emu, rare storks, bettong, Kites and Eagles are also at risk in daylight plus the travelling or visiting birds like the Brolga, nesting or migrating we have seen them and we haven't even mentioned flora.	The biodiversity impacts of the proposed development have been assessed as part of the Stage 1 DA and the Stage 2 DA. Biodiversity offsets are proposed.
P15	Yaaringay	> Change of site	With all due respect this is an objection being submitted asking for a change of venue and we feel it is necessary, It is our opinion that the Correctional Centre needs to be placed near Acmena Juvenile Justice Centre making 3 gaols in one, where there is no swamp and the airport is nowhere to be seen or heard (as where there is a will-there is a way). Not only that bright lights are at Acmena area already and nature has part prepared for any Justice Centre extensions and that most were lead to believe that would be the plan. This is a serious objection to the New Grafton Correctional Centre PLEASE reconsider location for the good of everyone.	Noted.

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
P16	WO	> Earthworks and Clearing	> I suggest avoiding all earthworks and forest clearing on your Avenue Road site (Lot 26 D P 751376 and Lot 1 DP 1190399 Lavadia). To avoid unnecessary cost to all NSW taxpayers, local communities, cultural heritage and environmental issues.	Removal of vegetation is required for the development and has been approved as part of the Stage 1 works. The impacts of vegetation removal have been addressed.
P16	WO	> Cost of infrastructure	> Site section -we (local community) now know the real cost (over, \$150million) for standard infrastructure makes this \$ 3million site, not financially practical.	Noted.
P16	WO	> Area inside security walls	> Area inside security walls – is now less then 40HA with a total floor place of less than 10HA. This makes many other sites closes to existing unfractured and services available.	These matters were considered in granting the Stage 1 consent.
P16	WO	> No EIS for infrastructure	> No integrated EIS or coordinated planning of your 3-major infrastructure - which are: <ul style="list-style-type: none"> • Existing regional airport. • Under construction W2 B Pacific highway upgrade. • Proposed New Grafton Correctional Centre. As these 3 major projects have a far greater impact as an overall then just individually: <ul style="list-style-type: none"> • Impact on rare and common fauna with multiple fencing. • Impact on cultural and living heritage. • Impact on traffic movements during construction, midterm, 50-year plan. (example: The John Holland contractors where not aware, their only far road access is now closed for a time unknown by RMS. Ref Duke St, July 2017 meeting).	The cumulative impacts of the construction of the Pacific Highway upgrade and the correctional centre have been considered in the EIS and measures recommended for coordination of construction activities. This included vehicle movements along Avenue Road.
P16	WO	> Grave sites in the area.	> The proposed correctional centre's access to the new W2B Pacific high way up grade- this area has been under review, being subject of grave sites from a massacre. (now over 50 grave sites have been recorded in this area, approx. 5 km south west of the Avenue Road's proposed correctional centre site).	There are no known grave sites on the site. Unexpected finds protocols will be implemented during earthworks approved as part of the Stage 1 consent.
P17	Name Withheld	> Right to Farm	> The proposed site along with our neighbouring property is zoned "Rural" - we object on the following basis with overarching theme that the proposed site is in a rural zone as a neighbour: i/ impacts agricultural activities - refer below right to farm. ii/ impacts on rural land scape and character - irreversible through building an operational phase. iii/ a correctional centre and working farm is not compatible - clearly a direct conflict - again refer right to farm. iv/ increased demand on public services - namely The Avenue North.	The response to ongoing agricultural farming activities is outlined in section 4.3.1. Residential amenity impacts are outlined at section 4.4.
P17	Name Withheld	> Right to Farm	> 1/ Right to Farm: We object to the DA and intend to operate our farming system in the "normal / business as usual" operation and consider the proposed site far too small and from diagrams on the EIS stage 2 Summary very small distances / buffers for such activities. These activities of normal farming include but are not limited to: a) movement of cattle / trucking and walking between other paddocks along The Avenue, b) movement of machinery including tractors and attachments along The Avenue. Local traffic has traditionally been limited and very respectful of stock / machinery movement e.g. giving way / speed etc however, highway bi pass has seen both an increase in the traffic plus at times disrespect for local traffic and activity - this is risk to both man and livestock (cattle horses / cattle dogs). Movement of stock / machinery occurs all year round - however in times of flood this is enhanced. c) spraying for noxious and poisoning weeds. d) spraying cattle for parasites. e) control of feral animals including wild dog / fox / rabbit etc and includes shooting and at times baiting. f) controlled burning / both dead after storms and weeds control etc. g) fertilising etc. Please note that the buffer to the western boundary was not articulated in the EIS page viii (East / North & South was however page 24 refers to 240m distance of	It is considered that the proposed development would have no significant impact on farming operations on adjoining or nearby properties where such operations are carried out in accordance with the law and relevant standards and guidelines. Implications on stock movements along Avenue Road are discussed in Section 4.3 below.

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
			building to Western boundary - please confirm as 240 will potentially impact normal farming activity).	
P17	Name Withheld	> Lack of consultation	<p>> 2/ Consultation - Appendix 25 EIS.</p> <p>a. Lack of consultation - we have not been consulted with, in fact the first consultation has been after our gate on our Eastern Entrance was chained and padlocked - chain / padlock has been removed since but this is not the behaviour of neighbours.</p> <p>b. Error - the June EIS (appendix 25) states that DALN 2 had been consulted - this is not true and we would like this to be noted and corrected. This is our first opportunity to provide feedback.</p>	<p>The property referred to in this submission has changed hands recently. All contact attempts had been to the previous owner of the land during preparation of the EIS document. During the exhibition, numerous further attempts were made to contact the previous owner to invite him to the workshops, and were not advised during this contact that the property had changed hands. A copy of the EIS on USB was delivered to the letterbox of the owner, with contact details to ensure they could in get in touch if they had further questions.</p> <p>As soon as the communications team was made aware of the change in ownership, the new owners we contacted and a meeting arranged. This was after the exhibition period. The team have been able to begin working through the two key issues which are: (a) Impact to routine farming practices and (b) Ownership of the crown land access road on the northern boundary of the property.</p>
P17	Name Withheld	> Access	<p>> 3/ Access</p> <p>We access via the dirt track to the north - this needs to be upgraded for additional traffic (e.g. fire control) and dead timber along track removed. We note Fire access track is planned along perimeter of APZ (page 44) - can more detail of such track be provided - e.g. standard (all weather) / location (on Road to the North etc).</p>	The proposed development has no impact on the Crown Road to the north of the site. It is proposed that existing access along this Crown Road would continue.
P17	Name Withheld	>Fencing	<p>> 4/ Fencing</p> <p>It is expected that cattle proof fencing be maintain in normal neighbour arrangement 50 / 50.</p>	A standard rural two strand wire and post fence would be constructed along the northern boundary of the site.
P17	Name Withheld	> Waste Water treatment	<p>> 5/ Effluent and Waste water treatment - we question why would a facility be built and not connected to the town / regions system? We hope planning takes into consideration key flooding / high rainfall events - usually summer low pressures (ex cyclones). The value of production (cattle - beef and dairy / fishing etc) from downstream creeks / low country (swamp) is significant and we cannot afford chemical spill / effluent overflow into either Glenugie Creek / Coldstream system.</p>	All assumptions for the design of waste water management system are detailed in the EIS.
P17	Name Withheld	> Traffic	<p>> 6/ Traffic on "The Avenue" North of entrance to proposed site. It appears that nil improvement is planned for this road including width / levelling etc and that "staff / contractors" will be encouraged to use other routes - how will this be monitored. Likewise visitor traffic etc needs to be managed once operational.</p>	Noted. Staff and visitors will be directed to access the site via Eight Mile Lane and Avenue Road.
P17	Name Withheld	> Land values	<p>> 7/ Land values - land values will be impacted from a demand aspect with respect to impacting agricultural business activity.</p>	Impacts of the development on land values were raised during the consultation program and have been addressed in Appendix 24 of the EIS. This issue was also addressed in the determination of the Stage 1 development consent. The Department acknowledged the issue raised in submissions received from the public regarding the risk to property values as a result of the proposed project. However, it is an established principle that the impact of a project on surrounding property value is not a planning consideration (refer e.g. Trinvass Pty Ltd and Anor v Council of the City of Sydney [2015] NSWLEC 151, [89]).
P17	Name Withheld	> Second correctional centre	<p>> 8/ Second correctional centre - 2 facilities in the town (& close proximity) of the size of Grafton seems out of alignment with towns of similar population. What other areas - and with lesser agricultural value were considered?</p>	These matters were considered in granting the Stage 1 consent.

No.	Submitter	Issues Raised	Issues (Detailed)	Response to Issue
P18	Name Withheld	> Employment opportunities	> Being a retired Prison Officer, I welcome this New Correctional Facility to our region. It was a very dark day for the local economy when the original gaol (where I was employed for many years) ceased to operate. The Clarence Valley and surrounding region can now look towards increased prosperity and employment opportunities for many years.	Noted
P19	Terry Elvey	Various matters raised	This submission has been reviewed in detail and consists primarily of objections to the Stage 1 DA and EIS and to the site selection process.	These matters were considered in granting the Stage 1 consent.

Table 3 – Response to Submissions from the Government Agencies

No.	From	Comment	Response
A1	Transport for NSW	It is acknowledged that the proponent intends on working with TfNSW and local bus operators to establish a bus service to the facility prior to the opening date in 2020. TfNSW supports this approach and requests that the proponent continue to provide details of construction progress, so that TfNSW can plan and allocate funding for the potential bus services.	Noted. NorthernPathways will liaise with TfNSW in relation to funding for a potential bus service
A1	Transport for NSW	TfNSW notes that Section 3.9 of the Transport & Accessibility Report states that provisions will be made onsite to accommodate bus services. Whilst TfNSW understands that the access road is 'bus capable', we require further detail regarding the pick-up/drop-off area (at Attachment A), to ensure there is adequate swept path for the safe movement of buses within the site.	Swept paths provided in Appendix 2.
A2	Rural Fire Service	The RFS has reviewed the documents associated with the SSD and provides the following comment.	Noted
A2	Rural Fire Service	1. The subject land is not mapped bush fire prone by Clarence Valley Council however evidence suggest both the woodland and grassland hazards are located on the subject and adjoining lands; and	Noted and consistent with findings of EIS.
A2	Rural Fire Service	2. The Opportunity to evacuate the facility due to bush fire is very limited. The facility is required to have suitable bushfire prevention measures to compensate for this requirement.	Noted and adequate measures have been incorporated into the design as described in Appendix 11 of the EIS.
A2	Rural Fire Service	3. The NSW RFS is the primary response agency for either bush or structural fires impacting on the facility;	Noted. This will be documented in operation plans for the NGCC.
A2	Rural Fire Service	The RFS generally has no objection to the proposal however, before we provide recommended conditions for any consent to be granted, the following amendment is required to be made to the EIS documentation: 1. The proposed asset protection zones as detailed in Appendix 11 of the EIS prepared by BBC consulting planners dated June 2017 (documented on figure 4.1 Bushfire Protection Measures page 20 Bushfire assessment report dated 30 May 2017) shall include the proposed internal access road and the Stage 2 clearing footprint associated with that internal access road.	Figure 4.1 in Appendix 11 of the EIS provided a range of bushfire protection measures including Fire trails, Stage 2 clearing footprint and broad locations of structures. The proposed location of the track is located inside the perimeter of the APZ and would be a minimum of 4 m wide, with passing bays every 200 m. The track will support heavy vehicles, and have a minimum vertical clearance of 4 m to any overhanging obstructions. It will meet the standards specified in the Bush Fire Coordinating Committee Policy No. 2/2007 Fire trails for Category 1 fire appliances. The APZ itself would be a managed environment and provides a low fuel hazard buffer between buildings and a bushfire hazard and create a defensible space. Development of a cleared zone around the secure outer perimeter of the high and low security facilities. The APZ is proposed to be 100m around the majority of the site and 20m around the WWTP. Figure ARC-DS_002 in Volume 2 of the EIS details the APZ.
A3	OEH	We have reviewed the EIS documents and advise we have no issues with historic heritage, NPWS Estate, flooding or estuary management.	Noted.
A3	OEH	However, we have identified some matters that should be addressed further in the EIS with respect to Aboriginal cultural heritage management and enhancement of wildlife corridors on the site.	Noted.
A3	OEH	Key requests The OEH supports the Aboriginal Cultural Heritage Management Plan (ACHMP) prepared for the project by Jacobs in May 2017. However, the plan does not include regular review and updating as a dynamic document or a process for ongoing consultation with the local Aboriginal Community. The ACHMP review process should provide ongoing culturally and scientifically appropriate management of any tangible Aboriginal values identified throughout the operational life of the facility. Non-tangible values relevant to the subject site should also be managed in consultation with members of the local Aboriginal community.1. The ACHMP should be updated to include regular review so it responds to industry best practice and possible additions to knowledge of Aboriginal Cultural values in the locality. Review of the ACHMP should also include an open and transparent consultation process with Aboriginal knowledge holders to enable ongoing engagement with and inclusion of the local Aboriginal Community.	An updated ACHMP is provided in Appendix 6

No.	From	Comment	Response
A3	OEH	2. The unexpected finds protocol be applicable throughout the construction phase and the operational life of the facility to ensure that any previously unknown Aboriginal objects or cultural values that may be identified during the life of the facility are effectively managed in a culturally sensitive and pro-active manner.	Noted. This will be documented in operation plans for the NGCC.
A3	OEH	OEH generally supports the biodiversity assessment and management components of the EIS. However the biodiversity assessment does not appear to have considered the potential impact of the project on local east-west wildlife corridor function, particularly the cumulative impact when considered in conjunction with the approved route of the Pacific Highway Upgrade. Widening of the vegetated buffer strips would enhance opportunities for safe fauna movement. 3. The proposed 30m wide vegetated buffer along the southern boundary of the site should be increased in width to at least 50m, preferably 70m where possible. In addition, the proposed 15m wide vegetated buffer along the southern part of the eastern boundary should be increased to a width to at least 30m, should extend up to approximately 550m north of the intersection of Avenue Road and Wants Lane.	The buffer area is currently proposed as approved under the Stage 1 consent. The buffer along the southern boundary would be complemented by landscaping within the road reserve. An increase in the buffer area to the southern and south-eastern boundary of the site can be accommodated in the design. This will be investigated as part of the Stage 3 Biodiversity Offset Strategy.
A4	EPA	EPA has no objection to the proposal proceeding largely as described in the EIS and have provided recommended conditions of approval.	Noted and recommended conditions are accepted.
A4	EPA	Operational Wastewater management:	
A4	EPA	a) Suitability of the irrigation area and adequacy of capability assessment - The irrigation area has some limitations related to low permeability subsoils (heavy clay subsoils 200-350mm deep in parts of the site) and sodicity risk. These will need to be carefully managed with the proposed low application rates, soil moisture sensors, targeted irrigation and soil amelioration	Noted. The Recycled Water Management Plan (RWMP), in Appendix C1, Table 1 (item C8) includes management of the irrigation scheme, incorporating specific measures to control irrigation rates, including low application rates, soil sensors, targeted irrigation, soil amelioration and monitoring.
A4	EPA	Periodic application of gypsum should be incorporated into the irrigation management plan to manage sodicity risks, based on soil monitoring.	The RWMP has been amended to specifically include this element, in both the Operational Management Plan (Appendix C1) and the Incident Response and Contingency Plan (Appendix E1). This amended RWMP is contained in Appendix 3.
A4	EPA	An appropriate array of soil water sensors should be used across the site and specifically cover the more susceptible parts of the site for low permeability.	Agreed, as committed to in the reports. Nominal soil moisture sensor locations are shown in drawing PRO-ENV-CD-DWG-00_500 (Appendix 4). These have been collocated with groundwater bores where possible to allow for common telemetry or logging systems.
A4	EPA	Moderate limitations for landform are the concave slopes and foot slopes. This combined with low permeability sub soil may increase the risk of lateral movement of irrigated effluent. The irrigation management plan should specifically target this risk with an action and trigger based management plan including visual inspections downslope	The RWMP includes both low irrigation rates to avoid any surface runoff and over wetting of soils, and both observations of irrigation areas during irrigation and continuous soil moisture monitoring to ensure over wetting is avoided. This element has also been included in the Incident Response and Contingency Plan in the RWMP.
A4	EPA	A 40m buffer to surface waters or drains is proposed for irrigation areas. Buffer distances to the SEPP 14 wetlands are not clearly stated. The environmental guidelines, use of effluent by irrigation (DECC 2004) recommends a 250m buffer around wetlands. Given the effluent will be low strength, a buffer of 50m or more would be appropriate with a tail water collection system was in place to capture any first flush run off to the wetland. It is noted that there appears to be a road on the eastern boundary of the irrigation area that may provide a suitable tail water collection or diversion structure.	The SEPP14 wetlands are located approximately 700m east of the closest point of the site, the northeast corner. As noted in the Stage 2 EIS, the site is split by a ridge running north-south for the full extent of the site, which splits site runoff into two sub-catchments: <ul style="list-style-type: none"> • the eastern part of the site draining to Coldstream River and Crows Nest Swamp (SEPP14 wetland), and • the western part draining eventually to Glenugie Creek/Deep Creek. Irrigation is to occur to ensure complete absorption of irrigation water during each irrigation event, so as to avoid the need for tail water and similar systems. Appendix 4 shows the irrigation areas, wastewater infrastructure, sub-catchments and the SEPP14 wetland, showing that only part of the irrigation areas are located within the SEPP14 overall sub-catchment. As noted in the wastewater report (and repeated by the EPA in their above comment), suitable buffer distances to nearby drainage systems are provided to avoid any runoff of irrigation water, when coupled with the above irrigation control rates. Note also the response to items above, noting that low irrigation rates, physical observation of irrigation events, and continuous soil moisture monitoring will be undertaken. As such, no fixed tail water collection system is proposed for the site. However, the road drain along the east of the site, and the detention basin in the west of the site can be dammed and used

No.	From	Comment	Response
			to capture the first flush runoff and pass back into the dam if required (for example, as a contingency should excessive irrigation occur, resulting in waterlogging, ponding, or runoff from irrigation, or should rainfall occur soon after over-wetting of soils). This has been added to the Incident Response and Contingency Plan in Appendix E1 in the RWMP (Appendix 3)
A4	EPA	There is adequate land area and appropriate soil conditions to manage nutrients on site. However, details of nutrient removal from the irrigation of areas (e.g. Cut and cart) are not provided. It is recommended methods to remove nutrients from the site are addressed in the response to submissions.	Noted. The removal of nutrients from the irrigation areas will be a normal part of the routine maintenance of irrigation areas – i.e. grassed areas slashed and slashed materials (i.e. grass clippings) removed from the site.
A4	EPA	b) Nil discharge and wet weather storage	
A4	EPA	The report claims based on the reserve data, that modelling shown in Section 2.5 has determined that the proposed scheme would reduce modelled overflows to less than 1 in 10 years on average and could likely be managed to completely avoid any overflows. However, MEDLI model output is only provided for the Priority modelled area. EPA considers the proposed 1 in 10 overflow frequency, for the effluent strength, is consistent with a nil controlled discharge scenario. While MEDLI modelling output for the full area has not been provided, the ERIM model run by the EPA for the proposal indicates the irrigation area and wet weather storage is adequate to provide flexibility in the ongoing management of effluent	It is assumed that the Priority Irrigation Area means the Primary Irrigation Area (the priority area is the key facility landscaped irrigation area within the facility, the Primary irrigation area is the 14ha in the south of the site). In terms of overflows, the MEDLI modelling in the WWMP shows long term responses for the normal operations of the site, where facility reuse is being undertaken. MEDLI modelling was conducted for the entire irrigation area (main + reserve) using the entire facility load (no facility reuse) to allow for a worst case contingency, with the results regarding overflows reported in the main report (Section 3.3.6.1, Table 3-3, page 31) showing 0 overtops for the 42.5ha total area. However long term acceptable application will be based on the Primary Irrigation Area only, since long term application will involve internal facility reuse (the above scenario over 42.5ha is a worst case, short term situation).
A4	EPA	Overflows from the wet weather storage lagoon are expected to flow from the western side of the lagoon towards the detention basin before any discharge from site. The receiving watercourse should be confirmed to ensure the discharge does not flow east to the SEPP 14 wetland	Any emergency overflow from the wet weather storage lagoon flows west, which is located within the western Glenugie Creek/Deep Creek sub-catchment, and so no discharge is directed towards the SEPP14 wetland. Refer to Appendix 4 showing the sub-catchment boundary and overflow path.
A4	EPA	Offsite reuse areas are discussed in the report but it is not clear if these are required or available. This should be clarified in the response to submissions.	These areas are not required for the scheme's long term sustainable operation. However, they offer potential opportunities for added flexibility in irrigation management, benefits in terms of community engagement (positive benefits for neighbours with very little to no cost to the site), and improved recycling of this potential resource. The availability is not important to the approval nor long term operation of the scheme, and this will be followed up during operations on an as needs basis and required approvals sought at the time.
A4	EPA	Offsite reuse areas are discussed in the report but it is not clear if these are required or available. This should be clarified in the response to submissions.	These areas are not required for the scheme's long term sustainable operation. However, they offer potential opportunities for added flexibility in irrigation management, benefits in terms of community engagement (positive benefits for neighbours with very little to no cost to the site), and improved recycling of this potential resource. The availability is not important to the approval nor long term operation of the scheme, and this will be followed up during operations on an as needs basis and required approvals sought at the time.

No.	From	Comment	Response
A4	EPA	c) Recommendations for requirements of design details. Irrigation up to field capacity is proposed. For effluent reuse schemes, it is generally advisable to irrigate soil to allow for a 5 to 10mm soil water deficit. This allows for buffer capacity in the soil should rain fall soon after an irrigation event. There appears to be adequate flexibility in the irrigation areas and wet weather storage to accommodate this soil moisture buffer capacity. The detailed design should address any issues related to the proposed fixed application rate and specify the appropriate coverage of soil moisture sensors for the parts of the irrigation area susceptible to waterlogging or poor subsoil drainage.	Noted. As nominated in the reports and the RWMP, irrigation will in any case be undertaken to avoid any overflow or runoff of irrigation waters, using a variety of methods to inform sustainable irrigation rates (see Appendix C1 (item C8 in Table 1) of the RWMP). The intention of the system is to maintain suitable control and utilise a system able to suitably control application rates. Note that the RWMP contains provisions specifying irrigation to within the hydraulic capacity of soils, with amendment to be adopted based on observations and soil moisture sensors (Appendix C1, Table 1, item C8). Drawing PRO-ENV-CD-DWG-00_500 shows the nominal locations of soil water sensors (Appendix 4).
A4	EPA	d) monitoring.	
A4	EPA	Effluent - The monitoring plan does not specify effluent monitoring indicators of frequency. Consistent with DEC (2004), it is recommended that initially total suspended solids, five day biological oxygen demand, pH, electrical conductivity, cations, and sodium adsorption ratio are monitoring quarterly and oil and grease, total phosphorus, and total nitrogen biannually. E.coli, should also be monitored to ensure the effluent does not exceed the limits for designated uses, as per table 3.8 of the National Guidelines for water recycling Managing health and environmental risks (EPHC, NRMCC and AHMC, 2006).	Appendix D of the RWMP has been amended to include monitoring as suggested (Appendix 3).
A4	EPA	Soil - The monitoring plan proposes monitoring soils for pH, electrical conductivity, exchangeable sodium percent, cation exchange capacity, phosphorus sorption capacity, organic nitrogen, nitrate-nitrogen, and total organic carbon. It is recommended that total phosphorus and phosphorus sorption be monitored after 6 years (and repeated every 6 years) (aligned with the 2 yearly proposed for other analytes). Available phosphorus should be monitored every 2 years.	Appendix D of the RWMP has been amended to include monitoring as suggested (Appendix 3).
A4	EPA	The monitoring plan does not provide details of sampling methodology such as depth increments and composite sampling. This should be developed to target key soil strata relevant to each indicators and risk, including below the root zone for the plant system.	Noted - the RWMP has been amended to include a nominated depth increment for sampling (Appendix 3).
A4	EPA	Groundwater	
A4	EPA	Groundwater monitoring is not proposed at this stage and risk factors should be managed by design of the irrigation scheme and soil monitoring below the root zone i.e. nitrates. Groundwater has been located about 5m below ground level in the south of the site and at more than 15m in the north. Therefore, given the greater vulnerability of groundwater in the southern part of the site, groundwater monitoring may be required (in addition to corrective action) in this area if future soil monitoring indicates increased risks.	The design will incorporate measures to control and allow for low irrigation rates. Soil monitoring will provide for monitoring lower down in the soil profile, and appropriate triggers for further action will be included in the RWMP. Note that groundwater monitoring has now been included in the scheme, as shown in Appendix D to the RWMP (Appendix 3). Groundwater monitoring bores established during the EIS investigations will be continued, with locations shown (nominally) in drawing PRO-ENV-CD-DWG-00_500, for baseline and ongoing groundwater monitoring. Monitoring requirements are detailed in Appendix D to the RWMP (Appendix 3).
A4	EPA	e) Recycled water management plan	
A4	EPA	The draft recycled water management plan is very general at the present and should be finalised, including triggers for management actions based on specific criteria of effluent, soil and other monitoring data. An updated Draft recycled water management plan should address the range of issues identified above.	Noted and agreed. A revised RWMP has been prepared taking into account the relevant items above, including specific contingency measures in Appendix E to the RWMP. The report will be further updated on receipt of conditions of consent following approval and during detailed system design (plant and irrigation scheme). A revised RWMP can be provided to the relevant agencies on finalisation.
A4	EPA	Managing impacts of concrete production works	N/A

No.	From	Comment	Response
A4	EPA	Through discussions with John Holland, a concrete batch plant will be operated on site to facilitate construction activities. The EPA has been unable to identify any reference to this facility or environmental measures specific to its operation. Concrete production works typically generate a highly alkaline wastewater stream and which needs to be managed through process reuse or treated prior to discharge. Dust and solid waste issues also require management.	mobile concrete batching plants and pre-cast yard will be used during construction as referred to in the EIS in the Construction Environment Management Plan (Appendix 12), Construction Traffic Management Plan (Appendix 13), Environmental Noise and Vibration Assessment (Appendix 15), Transport and Accessibility Report (Appendix 19). Further details are provided in Section 5. These elements have been clarified in 5.1. Details of the wastewater treatment stream for the temporary plants will be provided prior to commissioning and will be incorporated into the CEMP. Dust and solid waste issues will be managed through implementation of the CEMP. The acoustic impacts of the plant operation have been assessed and found to be acceptable. Traffic impacts of on-site batching and pre-cast activities have been assessed with an overall reduction in traffic movements resulting.
A4	EPA	It is essential that the Construction Environmental Management Plan be amended to address these issues.	A condition of consent to this effect is acceptable.
A4	EPA	Depending on the nature of concrete production works on site, the EPA may vary EPL 209602 to include conditions to address these risks.	Noted and discussions have commenced in this regard.
A4	EPA	Environmental Protection Licencing - Operational	
A4	EPA	Given the size of the proposed sewerage treatment plant is below the licencing thresholds under Schedule 1 of the POEO Act, it is unlikely an EPL will be required for its operation.	Noted
A4	EPA	4. Recommended Conditions of Approval	
A4	EPA	a. Construction i. The proponent must comply with the conditions of EPL number 209602 issued by EPA on 11 July 2017. ii. The CEMP is to be updated to address specific environment risks posed by a concrete production facility	These conditions are acceptable.
A4	EPA	b. Operational wastewater and irrigation management i. The Proponent must provide an updated wastewater management plan that addresses the issues raised in Section 1 above. ii. The Proponent must operate the wastewater treatment plant and reuse/irrigation systems generally in accordance with the updated wastewater management plan required above. iii. The operator must comply with Section 120 of the POEO Act 1997 which prohibits pollution of waters. iv. The Operator shall provide a draft recycled water management plan to EPA for review and comment prior to irrigation of the site. v. Biosolids generated from operational wastewater treatment plant are to be managed in accordance with Environmental Guidelines - Use and Disposal of Biosolids Products (EPA 1997).	These conditions are acceptable.
A05	Roads and Maritime Services	1. The Transport and Accessibility Report (TIA) proposes significant increases in peak hourly traffic movements (up to 300vph) generated along the designated access routes and intersections on the Pacific Highway following project completion. The TIA should further consider the impacts of operational traffic on the road network over a 10 year horizon following project completion. In particular Eight Mile Lane and Six Mile Lane intersections with the Pacific Highway should be considered. Any works must be designed and constructed in accordance with Austroads Guidelines, Australian Standards and RMS Supplements.	The Year 1 traffic generation is the same as the Year 10 traffic generation. The Pacific Highway upgrade would be completed prior to the facility opening and consequently the traffic volumes along the existing Pacific Highway would be significantly reduced and capable of accommodating traffic flows from the development.

No.	From	Comment	Response
A05	Roads and Maritime Services	<p>2. The TIA has identified significant increases in peak hourly traffic movements (up to 810vph) along the designated access routes and intersections on the Pacific Highway during the construction phase of the development. In particular the TIA has identified that vehicles entering the Pacific Highway at the Eight Mile Lane and Six Mile Lane intersections will experience unacceptable delays during the AM peak period. The modelled level of service for right turns onto the highway during the peak hour is identified as unacceptable.</p> <p>The Construction Environmental Management Plan (CEMP) and/or Construction Traffic Management Plan (CTMP) should be further expanded to identify specific measures to address the safety and efficiency of affected intersections on the Pacific Highway during the construction phase of the development.</p>	A condition of consent requiring the CEMP to be amended to identify specific measures to address the safety and efficiency of affected intersections on the Pacific Highway during the construction phase of the development is acceptable.
A05	Roads and Maritime Services	<p>3. Section 4 of the CTMP should be further expanded to provide detail of proposed communication measures for regular and ongoing consultation with Council, Roads and Maritime and Pacific Complete.</p> <p>Consultation should inform the management of cumulative traffic impacts arising from the project and concurrent infrastructure projects in the subject area. It is suggested that a coordinated schedule of expected weekly traffic movements be developed to inform a coordinated approach to traffic control and community consultation.</p>	A condition of consent to this effect is acceptable.
A05	Roads and Maritime Services	<p>4. The description of existing road conditions under Section 5 of the CTMP could be further expanded to include details of likely road safety impacts generated along the designated access route during both the construction and operational phases of the project</p>	A condition of consent to this effect is acceptable.
A05	Roads and Maritime Services	<p>5. The TIA should include swept path analysis for the relevant design vehicle at each intersection along the identified access route. Intersections on Eight Mile Lane and Avenue Road should meet the minimum geometric and design specifications to the satisfaction of Council.</p>	<p>Intersections design for Eight Mile Lane and Avenue Road intersection is being undertaken by RMS. The intersection of Avenue Road and the entry of the site has been designed in accordance with Austroads 2010 'Guide to Road Design – Part 4A: Unsignalised and Signalised Intersections'.</p> <p>Avenue Road will be upgraded to have a Basic Right Turn facility plus a Basic Left Turn facility and slip lanes as detailed in the EIS. This intersection will accommodate all vehicle movements for deliveries and buses as well as passenger vehicles. Provision to curtail access to the site by stock during movement along Avenue Road will be incorporated.</p>
A05	Roads and Maritime Services	<p>6. The compliance management measures proposed under Section 8 should be further expanded to identify key issues, including the proposed frequency of communication, monitoring and auditing processes.</p>	A condition of consent to this effect is acceptable.
A05	Roads and Maritime Services	<p>7. Any Traffic Control Plan proposed under the CTMP to address impacts on the Pacific Highway is to be prepared in accordance with the RTA Traffic Control at Worksites Manual. Prior to the implementation of any TCP on the Pacific Highway a Road Occupancy Licence (ROL) is to be obtained from Roads and Maritime Services. Further detail on how to apply for an ROL can be obtained from: http://www.rms.nsw.gov.au/business-industry/road-occupancy-licence/index.html</p>	A condition of consent to this effect is acceptable.

No.	From	Comment	Response
A05	Roads and Maritime Services	8. Vehicular access to the development is likely to occur outside of daylight hours and during periods of low visibility, such as fog. Further consideration should be given to the installation of appropriate street lighting at key intersections along the identified access route to improve safety for road users.	<p>Vehicular access to the development outside of daylight hours is expected to be minimal. All visits and deliveries would be during daylight hours. Staff movements for the night shift would be the only movements. This shift is significantly smaller than the day time shift.</p> <p>The need for lighting at intersections of public roads with Avenue Road would be determined as part of the upgrade works for these intersections.</p> <p>No lighting of the access to the site is proposed.</p>
A06	Department of Primary Industries	<ul style="list-style-type: none"> The proponent should prepare a Traffic Management Plan including appropriate measures to manage road sharing with surrounding landholders, particularly with respect to stock movement, and to monitor and address complaints during both construction and operation of the correctional centre. DPI recommends the proponent consult with Local Land Services and affected landholders during the development of the plan. 	<p>Discussed below in Section 4.3. A TMP will be prepared prior to Stage 2 construction commencing and in consultation with Local Land Services and the relevant farms moving stock along Avenue Road including those making a submission who have current Routine Stock Movement Permits. A condition of consent to this effect is acceptable.</p> <p>It is noted that the contractor engaged to upgrade Avenue Road south of Wants Lane to Eight Mile Lane has been successfully accommodating stock movements in cooperation with farmers.</p>
A06	Department of Primary Industries	<p>The proponent should prepare a Soil and Water Management Plan for the development which includes the following:</p> <ul style="list-style-type: none"> o management strategies and measures to mitigate potential impacts to water sources and water users from the disposal of water from dam dewatering; o additional soil testing to determine the potential for acid generation and the development of an Acid Sulfate Soil Management Plan where a risk is identified; and o groundwater monitoring for water level and water quality and the development of a contingency response protocol to address potential impacts from irrigation and the wet weather storage in the southern part of the site. 	<p>This can be addressed by condition of consent. A Soil and Water Management Plan is in place for Stage 1 and would be amended to include Stage 2 works.</p> <p>Water sources and strategies for dewatering of existing dams are in place as this work will occur during the Stage 1 works.</p> <p>Testing completed for the Geotechnical Study included as Appendix 6 of the EIS concluded that the results of testing and the understanding of the history of the formation of these site soils do not indicate the typical formation of acid sulfate soils. This is because the soils do not contain sulphides, and are nonestuarine in origin. However, based on the results there is another actual acid hazard which will require further field and laboratory investigation to quantify the risk. Additional geotechnical investigations undertaken in July 2017 by Coffeys indicated that the soils were not potential ASS or actual ASS. This was confirmed following the SCR tests results showing that the soils within this area are naturally acidic soils with no residual sulphur present. Naturally acidic soils do not have the acid generation potential of an ASS and are not of concern. These soils do not require treatment by addition of lime for neutralisation purposes.</p> <p>Groundwater monitoring is to be implemented as per the Recycle Water Management Plan.</p>
A06	Department of Primary Industries	Works on waterfront land, including construction and rehabilitation of detention basins and modifications to existing dams, should be conducted in accordance with DPI Water's Guidelines for Controlled Activities on Waterfront Land (available at http://www.water.nsw.gov.au/water-licensing/approvals/controlled-activity).	Noted. The construction of detention basins is part of the Stage 1 works. Jacobs advise that there are no rivers or streams traversing the site. Notwithstanding, this can be addressed by condition of development consent if required.
A06	Department of Primary Industries	<p>Impacts to agricultural enterprises</p> <ul style="list-style-type: none"> It is important that the movement of stock by surrounding landowners is not hindered by increased traffic movement relating to the project during the construction and operation phase and any potential for conflict risk is minimised. It is noted that the proponent outlines a commitment to consult with affected landowners and to include appropriate mitigation measures within the Construction Traffic Management Plan however more consideration at the operation phase will also be required. It is recommended that Local Land Services be involved in the planned consultation to ensure all parties are aware of their legal obligations and a plan of management that includes appropriate management for road sharing and monitoring of complaints is established. 	Discussed above and in Section 4.3.

No.	From	Comment	Response
A06	Department of Primary Industries	<ul style="list-style-type: none"> Water main installation via easements on private properties is proposed as part of a separate process under Part 5 of the Environmental Planning and Assessment Act 1979. It is recommended that the proponent consider how they manage disruption to agricultural activities during this time. Further information is available in the Infrastructure Proposals on Rural Lands Factsheet available at http://www.dpi.nsw.gov.au/land-and-water/land-use/lup/developmentassessment2/infrastructure-proposals. 	The installation of the water main will be undertaken in accordance with the approved REF and is not a consideration of this application.
A06	Department of Primary Industries	<p>Impacts to water resources</p> <ul style="list-style-type: none"> Water supply is proposed via a pipeline and connection to the Clarence Valley Council water reticulation system. An impact assessment and approval for this requirement is proposed as part of a separate process under Part 5 of the Environmental Planning and Assessment Act 1979. Water supply security is therefore yet to be confirmed. 	Water supply has been confirmed as contained in the approved REF.
A06	Department of Primary Industries	<ul style="list-style-type: none"> In the southern part of the site groundwater has been identified at shallow depth and there is a history of waterlogging due to high rainfall. As this area is proposed for the wet weather storage lagoon and the primary irrigation area there is a risk of raising the water table and groundwater quality impacts due to seepage and irrigation loading. It is recommended groundwater monitoring be included in this area to monitor and manage potential impacts. Adequate baseline data collection will be required prior to commencement of operations. 	The nominal location of groundwater monitoring bores is shown in drawing PRO-ENV-CD-DWG-00_500, and groundwater monitoring has been included in Appendix D to the RWMP, including baseline monitoring (Appendix 3).
A06	Department of Primary Industries	<ul style="list-style-type: none"> The EIS has not confirmed whether groundwater will be intercepted during the proposed excavations. Based on the groundwater depths provided it is recognised to be a low risk. If groundwater is intercepted the proponent will need to consult with DPI Water to confirm relevant licensing and management requirements. 	Based on geotechnical investigations, groundwater is not likely to be intercepted.
A07	Clarence Valley Council	Roads and water – Council accepts that required road and water upgrades are generally being addressed through design and construction approved under the Stage 1 approval. However, there is some concern that there is still potential for a significant impact on the road network outside that agreed upgrading. Specifically, there is potential for The Avenue north of the site to Ulmarra (and connecting roads) to be extensively used as access to the site from the north. It is accepted that the facility operator cannot control public behaviour but can control that of its employees. Accordingly, a condition requiring the operator to have in place management practices that require workers to access the site from the south is requested.	A condition requiring the operator to have in place management practices that require workers to access the site from the south is acceptable.
A07	Clarence Valley Council	On-site sewerage management – Council understands that as the proposed onsite effluent management scheme is sized at under 2,500ep, that Council is the regulatory authority (ARA). Council's concern is that it does not have the dedicated expertise or resources freely available to undertake that role given the specialised nature of such a system and the development that it serves. Notwithstanding the legal requirements to assign regulatory responsibility, it is Council's view that an external body such as the EPA is a more appropriate regulatory and compliance agency in this instance and would request that a condition be imposed to this effect, if legally possible and obviously subject to Agency agreement. Alternatively, if not possible, it would be Council's request that the operator be required to arrange for independent routine inspection and compliance reports be provided to Council by a suitably accredited consultant throughout the life of the project, sufficient for Council to meet these compliance obligations.	NorthernPathways would work with any nominated regulatory authority.
A07	Clarence Valley Council	Council appreciates the socio-economic impact assessment. It is requested that the proponent be required to liaise with Council throughout the operation of the facility in regard any measures proposed to mitigate such impacts.	Noted. Mitigation measures are recommended in the SIA requiring liaison with Council throughout the operation of the facility
A07	Clarence Valley Council	Lighting – All lighting should be in accordance with the relevant Australian Standard and should minimise ambient and overspill lighting as much as possible.	As stated in the EIS, all external lighting has been designed with a view of achieving full compliance with the functional / security requirements of the brief and compliance with the Australian Standard, AS4282, "Control of the Obtrusive Effects of Outdoor Lighting.

No.	From	Comment	Response
A07	Clarence Valley Council	Section 94A Contributions – Council appreciates the legal and State Government policy position on the applicability of such contributions, in particular in terms of a development such as this. Notwithstanding, Council is of the view that the facility will increase demand for a range of public amenities and services (such as impact on public recreation due to increased staffing, social impacts, image impacts) and as such, a Section 94A contribution appropriate to those impacts is reasonable. Hence, a condition requiring a contribution in an amount to be determined through consultation between the proponent and Council is requested.	The Proponent and Council have agreed to contributions to be made for the project.
A07	Clarence Valley Council	Council suggests a condition of consent requiring a contribution towards the cost of water supply headworks costs	The nature of the contributions sought by Council in respect of water are not applicable to this application.
A07	Clarence Valley Council	Wording of conditions should require Council "approval" only where Council's direct assets or interests are involved, otherwise, consultation with Council would be appropriate.	This is a matter for DPE however the Proponent raises no objections to the suggestion.

4. RESPONSES TO MATTERS RAISED BY THE DEPARTMENT OF PLANNING

4.1 Social Impacts

The NSW Department of Planning and Environment has requested the following matters of social impacts to be addressed:

- Provide further consideration of concerns raised by groups in the community in relation to impacts on indigenous communities and culture, including Aboriginal parties who may not be formally registered parties but still form part of the community that would be impacted by the proposal.
- Provide further consideration of the direct and indirect cumulative impacts from the proposal and other major development within the region on surrounding rural towns including impacts on their way of life, community and social cohesion.
- Provide consideration of impacts on the change in character of the area and what measures are proposed to mitigate the impacts.
- Provide details regarding potential anti-social behaviour of visitors and management of impacts on adjoining neighbours (operational management plan).

The comprehensive Social Impact Assessment, together with the Social Baseline Study, was prepared in accordance with the Secretary's Environmental Assessment Requirements, issued by the Department of Planning and Environment. Supporting the Environmental Impact Statement (EIS) for the Stage 2 Development Application, the SIA was informed by extensive community and stakeholder engagement including directly affected landholders and neighbours, local communities, hard to reach groups and stakeholders.

A thorough and robust program of community engagement for the Stage 2 EIS was submitted to the Department of Planning and Environment, demonstrating the comprehensive approach being undertaken and the activities planned. The program of engagement was undertaken in two phases, the first phase was to inform the preparation of the EIS, informing the Social Baseline Study and the Social Impact Assessment. This phase of engagement assisted in identifying and considering the potential impacts of the proposal on directly affected landowners and neighbours, key stakeholders and the general community. The second phase of engagement was designed to gain a deeper understanding of the perceived strengths, challenges and impacts of the proposed NGCC and further inform the proposed mitigation and management strategies outlined in the EIS. As well as the targeted and focused engagement techniques, a number of activities were undertaken,

designed to reach the general public, which included pop-up stalls at local markets in Yamba, Glenreagh and Woolgoolga and Grafton Shopping World, during both the development and exhibition of the EIS.

As noted in the Phase 2 EIS Exhibition Period Engagement Report (Appendix 1), the engagement program identified the optimum way in which meaningful, respectful and authentic engagement with hard to reach groups, including Aboriginal and Torres Strait Islanders, young people and socially disadvantaged communities could be undertaken. As a result, the Phase 2 EIS Exhibition Period Engagement Program included specifically tailored engagement activities to invite important input from these hard to reach groups.

As noted in the Stage 2 EIS exhibition period engagement report there is overall support for the NGCC proposal from the wide community and stakeholders, with issues informing the SIA, and raised during the Phase 1 engagement, consistent with issues raised in the Phase 2 engagement period. Directly affected landowners and neighbours, are identified as having unique key concerns and issues, particularly in relation to the impacts on way of life and rural lifestyle, during both construction and operation.

4.1.1 Provide further consideration of concerns raised by groups in the community in relation to impacts on indigenous communities

There has been an on-going process of engagement and consultation associated with the proposal since the initial announcement. Engagement and consultation has continued throughout the Stage 2 DA process, and will continue through the construction phase and during operation. The following reports detail the approach to consultation and the outcome of consultation and engagement activities during the preparation of the EIS and during the exhibition of the development application:

- *Engagement to Support the Development of Stage Two EIS – NGCC Engagement outcomes report* prepared by StraightTalk, May 2017 which informed the Social Impact Assessment and the EIS;
- *Phase Two EIS Exhibition Period Engagement – Outcomes Report* prepared by StraightTalk, August 2017.

The consideration of submissions and response to matters raised in relation to Aboriginal Cultural Heritage have been discussed with Jacobs Group, who were engaged to prepare the Aboriginal Cultural Heritage Assessment for the Stage 1 EIS and Stage 2 EIS. In response, the following is noted:

- All consultation in relation to Aboriginal Heritage has been undertaken in accordance with the Office of Environment and Heritage's Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010. The Stage 1 Aboriginal Cultural Heritage Management Plan was approved by the Secretary on 27 March 2017.

- Following exhibition of the Stage 1 EIS OEH stated that it 'supports the EIS's recommendations for Aboriginal Cultural Heritage management and considers the level of assessment and consultation with registered Aboriginal parties to be adequate'.
- The search for possible ceremonial grounds/Bora Ring was undertaken by the Registered Aboriginal Parties (RAP), before salvage operations commenced. Following the comprehensive survey by RAP site officers across the entire NGCC Project area it was found that no significant Aboriginal cultural heritage values (such as a Bora Ring or ceremonial site) were present within the entire Project Site boundary.
- Following approval for the concept proposal (Stage 1 NGCC Development Application) salvage operations were undertaken, of Potential Archaeological Deposits, that had been identified in the Aboriginal Cultural Heritage Assessment Report completed for the Stage 1 DA and EIS. It is noted that during the site survey and sub-surface test investigations the Registered Aboriginal Parties communicated a strong expression of connection to the landscape and a desire to preserve and protect the remnant Aboriginal archaeological heritage where it was known to be present. Salvage operations were undertaken by members of the Yaegl Local Aboriginal Land Council and as a result the Aboriginal heritage assessment completed to date has fulfilled the cultural heritage management obligations for the project. The artefacts are to be returned to the RAPs care for educational purposes and are to be kept at the Yaegl keeping place.
- No evidence of a song line or other ceremonial significance or additional artefacts has been confirmed and these issues have not been raised by Aboriginal people with a connection to the site. Works carried out to date under the Stage 1 consent have not uncovered any additional artefacts to those identified during salvage operations.
- The Aboriginal Cultural Heritage Management Plan, prepared in accordance with the Stage 1 approval, and exhibited with the EIS, outlines the requirements for the avoidance, management and mitigation impacts to Aboriginal cultural heritage and includes recommendations for any Aboriginal heritage that may be potentially impacted by the development. Following a review of the submissions received in relation to the Stage 2 exhibition, the approved plan has been updated to detail the frequency of its review and ongoing consultation intentions.
- NorthernPathways engagement with relevant Local Aboriginal Land Councils is ongoing and includes representatives from both the Yaegl and Ngerrie Local Aboriginal Land Councils (which includes members of the Gumbaynggirr traditional owners), and various members of Gumbaynggirr, and the NSW Deputy Ombudsman, Aboriginal Programs, NSW Ombudsman.

The unexpected finds protocol will be followed during all construction and operations on site.

During the preparation of EIS, consultation with indigenous groups focussed on indigenous groups and organisations. This was extended during the exhibition period to include individuals and groups and hard-to-reach groups in the community including young people, socially and economically disadvantaged residents and Aboriginal persons.

Targeted Phase 2 Stakeholder Engagement

As part of the Phase 2 engagement activities undertaken during the EIS Exhibition Period, relevant Aboriginal community members and organisations were targeted for engagement through a variety of activities including:

- An introductory meeting
- Yarning circles
- NAIDOC Information Stalls
- Aboriginal community members were asked how they wanted to be involved and how often they wanted to meet, and as a result, three Yarning Circles were held at the Grafton Community Centre to identify key issues and discuss opportunities for the ongoing involvement of Aboriginal people in employment, cultural programs and support within the construction and operation of the NGCC.
- A stall was held during the Grafton NAIDOC week at the suggestion of the Yarning Circles where 40 members of the community discussed the project and its impacts with project team members.
- The Maclean NAIDOC week event was also visited with a pop up stall, with 25 community members participating in conversations.

The targeted engagement program was undertaken to ensure all relevant Aboriginal community members and organisations were engaged within an appropriately inclusive and flexible manner that would allow all representatives to contribute their views. The details of the Aboriginal engagement activities are included in the attached *Phase Two EIS Exhibition Period Engagement - Outcomes Report* (Appendix 1).

As a result of the engagement, Aboriginal community members and representatives highlighted the importance of ongoing engagement and integrating Aboriginal culture into the NGCC. Participants said that culturally appropriate programs for Aboriginal inmates that were closely linked to the outside community, were crucial to reducing reoffending rates. Aboriginal participants across the consultation program were supportive of continuing to be involved in the project.

Consultation with Gumbaynggirr

Consultation with the Yaegl Traditional Owner Corporation and Yaegl Local Aboriginal Land Council (a LALC formed from Yaegl and Gumbaynggirr people) and



the Ngerrie LALC (a LALC formed from Yaegl, Ngerrie and Gumbaynggirr people) indicated that the site formed part of Gumbaynggirr traditional lands but fell under the Yaegl Local Aboriginal Land Council Area. Gumbaynggirr Traditional Country includes lands located in the Mid North Coast of NSW from the Nambucca River to the Clarence River (Grafton), and eastward to the coast.

Consultation and search for representative parties during Stage 1 EIS did not attract contact from Gumbaynggirr. The Gumbaynggirr Traditional Owners were invited to be part of the consultation process and did not respond.

Additional consultation with elders / knowledge holders of Gumbaynggirr has been undertaken as part of the Stage 2 EIS. Further consultation has also been undertaken with Yarringay Holdings who provided a submission to the Stage 2 exhibition process. A summary is provided in the following table:

Table 4 Additional Consultation

Date	Location / Event	Participants	Outcomes
21 August 2017 9.45am – 12.30pm	Sod Turning Ceremony New Grafton Prison Site	<ul style="list-style-type: none"> • John Holland personnel • Local Aboriginal Legal Services representative • Gumbaynggirr members 	Confirmed that no significant sacred site within the Prison project footprint. A bora ring was located approximately 1.5km away from the Prison site.
21 August 2017 1pm-2pm	Maclean RSL Club lunch meeting	<ul style="list-style-type: none"> • John Holland personnel • Representatives of the Yaegl Traditional Owner Corporation 	The Yaegl representatives had walked the whole Prison site with Jacobs, and undertaken extensive investigations. They located some heritage items which were bagged and accurately documented. No bora ring found anywhere on the site. Confirmed that no places located on site holding any cultural significance. Confirmed that the Prison site is within Gumbaynggirr traditional lands but falls under the Yaegl Local Lands Council's area.
21 August 2017 2.30pm – 3.30pm	Yaegl Local Aboriginal Land Council Office Maclean	<ul style="list-style-type: none"> • John Holland personnel • Representatives of the Yaegl Traditional Owner Corporation • Executive of Yaegl LALC 	Confirmed Yaegl LALC has jurisdiction over the Prison site. Considered site monitoring for aboriginal heritage items and places was completed thoroughly. Confirmed no bora ring located on site. Confirmed that the representatives of Yaeringay Holdings are not the correct knowledge holders for the area and do not have authority to represent Gumbaynggirr people.
22 August 2017 9am – 9.20am	Toast Café Grafton	<ul style="list-style-type: none"> • John Holland Personnel • Executive of Grafton-Ngerrie LALC 	Confirmed who are the personnel with authority to represent Gumbaynggirr people.
22 August 2017 2.10pm – 4.30pm	Campsite near Bom Bom National Park	<ul style="list-style-type: none"> • John Holland Personnel • Representatives of Yaeringay Holdings 	Actual location of Prison site confirmed as it was mistakenly thought to be near Acmena Youth Detention Centre which is the Yaeringay representative's preferred location. Representatives of Yaeringay suspected a bora ring is located on the site but no location could be identified or confirmed. Opportunities for ongoing engagement was presented.

This consultation has revealed that:

- no bora ring is located on site and no ceremonial significance is attached to site;
- The representatives of Yaaringay Holdings do not have cultural knowledge of the site;
- The appropriate elders / knowledge holders of the Gumbaynggirr have been identified and are represented on the Consultative Committee for the project; and
- We are advised that a memorandum of understanding exists between the Yaegl LALC and the Gumbaynggirr giving jurisdiction to the Yaegl LALC consistent with the position taken during the Stage 1 EIS.
- Yaegl LALC, Grafton Ngerrie LALC and the recognised elders / knowledge holders of Gumbaynggirr (noting that Gumbaynggirr has representation on both the Yaegl and Grafton Ngerrie LALCs) will continue to be involved in the consultation process during the construction services phase of the project.
- The NSW Deputy Ombudsman, Aboriginal Affairs will also form a key stakeholder for ongoing engagement during development of the NGCC (in relation to Aboriginal Participation in Construction).

Strategies proposed in the SIA

As outlined in the SIA forming part of the EIS for the Stage 2 Development Application, a number of strategies were suggested to address the impacts on Aboriginal Cultural Heritage. These included:

- A plan that implements the operator's Reconciliation Action Plan and meets the 8% Indigenous employment target.
- Working with Indigenous groups to monitor and update Inmate Rehabilitation and Reintegration Programs.
- Development of a specific Aboriginal Participation in Construction Plan to achieve 1.5% of spend target for Indigenous Engagement.
- Ongoing engagement with Indigenous representatives from the local TAFE and Community Colleges.
- Establishment of an Aboriginal Cultural working group to build partnerships with local industries, NGOs and service providers, traditional land owners and Aboriginal groups to promote regional economic and social development and rehabilitation and reintegration programs for inmates.

- Consideration of engagement with local or high profile Indigenous leaders to promote and support training and employment opportunities.
- Development of a program for the provision of inmate art through the engagement with Clarence Valley Council's Cultural Committee and regional art galleries.

Recommended actions/strategies

As a result of the additional stakeholder engagement, it is recommended that the suggested mitigation and enhancement strategies are adopted with the following additions:

- Incorporation of culturally appropriate programs for Aboriginal inmates, approved by CSNSW, closely linked to the outside community in order to reduce reoffending rates. This would include Aboriginal healing models with local specialists, and an Aboriginal elder mentoring program to allow for loss and grief awareness programs to be included with direct links with elders from different areas and specialties who are able to attend sessions with inmates. As part of this linking program there is proposed to be ongoing training and support services to train others to effectively ease the burden on existing elders.
- It is recommended that quarterly yarning circles are conducted with a focus on projects employment/training and business opportunities for the local community. It is recommended that a number of members are invited from lands Councils, Aboriginal Services (Medical and Legal) Employment and training services and organisations. It is noted that discussions are to be held with Corrective Services NSW Aboriginal Strategy and Policy Unit prior to any program of Aboriginal Cultural Inclusion prior to the operation of the NGCC.
- Ensure that the project team (during both construction and operation) works with Indigenous representatives from the local TAFE and Community Colleges to design and prepare job descriptions and induction training manuals that outline the cultural significance of local Aboriginal communities as well as the Aboriginal significance of the site. It is recommended that all NGCC employees undertake cultural awareness training at induction to foster respectful relationships with inmates and Aboriginal staff.

4.1.2 Direct and Indirect Cumulative Impacts from the proposal and other major development within the region on surrounding rural towns.

Engagement with communities in the wider Clarence Valley area and the site of the NGCC was undertaken during the development of the SIA and the exhibition of the EIS, with pop up and intercept activities at:

- Woolgoolga
- Glenreagh
- Maclean
- Yamba

This engagement expressly sought to understand potential cumulative impacts of the NGCC on surrounding communities.

In addition, engagement with Council and the Clarence Valley Roundtable was undertaken and will continue during construction and operations.

As examined in the SIA prepared to support the EIS for the Stage 2 Development Application, the cumulative effect of the proposal and other major development projects within the region on the community are evident, particularly in relation to the recent commencement of major infrastructure projects such as the Woolgoolga to Ballina Pacific Highway Upgrade. It is likely to be during the construction process where the most direct cumulative impacts will occur, due to the coincidence of construction timetables of major projects. The duration of the cumulative impacts in relation to the construction phase is likely to be felt between 2017 – 2020, aligning with the construction and opening of the NGCC.

As identified within the SIA, concern has been raised by the community that despite promises, major infrastructure projects underway within Grafton have not significantly drawn from a local employment base. In recognition of this concern a target of 80% of the construction workforce for the NGCC is to be sourced from within the local area (within a 90 minute drive from the site). Part of the resourcing strategy to be implemented to achieve this target includes the advertising and attraction of local candidates from the Northern NSW area, utilising existing John Holland Group (JHG) workforce resources who have previously worked in the area, and retention strategies to maintain employees during the life of the construction phase. In addition, initiatives include targeted training delivery in partnership with local Aboriginal service providers, such as the North Coast TAFE's Aboriginal Learning Circle as well as the hosting of regular forums with local community groups regarding opportunities for input into design, employment and procurement for the project.

A Construction Traffic and Pedestrian Management Plan provided with the Stage 2 EIS identified the potential cumulative construction impacts of projects and measures to mitigate any associated general traffic, public transport, parking, pedestrian and cyclist impacts. To date, JHG and Pacific Compete have worked together to ensure the cumulative impacts of the construction of the NGCC and the Woolgoolga to Ballina Pacific Highway Upgrade are monitored and managed. Regular weekly communications meetings are held between Pacific Complete and JHG to facilitate the flow of information between the two construction projects.

The indirect cumulative impacts on the wider Grafton area, have been considered in the preparation of the SIA, with the main potential impacts found to include:

- The effect on rental and purchase housing from the concurrence of the Pacific Highway upgrade, the Clarence River Crossing Project and the NGCC.
- The effect on short term accommodation during the construction of these three projects and possibly also berry farming projects requiring seasonal workers.

The construction of NGCC (and the cumulative affects of construction of the Clarence River Crossing Project and Pacific Highway upgrade) may result in changes to surrounding rural towns owing to the increased demand for worker accommodation. This could have the affect of raising the price of short-term accommodation for the duration of construction. The impact of this could result in displacement of existing residents and/ or an economic slump of the town following completion of construction.

Whilst these impacts are possible, a number of strategies can be employed to mitigate these potential impacts. The main mitigation relates to sourcing workers from the local area and sourcing supplies locally. Northern Pathways have committed to targeting 80% of the workforce from the local area, defined as up to 1.5 hours from site. This would greatly reduce the impact of housing demand for incoming workers as up to 80% of the workforce would already be located within the area. This would also negate the impact of temporary spikes in short-term accommodation, negating the indirect potential impacts of displacement of residents and economic slumps within towns following completion of construction.

For any workers requiring short-term accommodation, it is envisaged that any short-term accommodation needs would be better met by the existing market. This would provide opportunities for existing businesses to benefit from the construction of NGCC. Furthermore dispersed short-term accommodation would mean that the corollary benefits to towns such as workers requiring meals and supplies would be dispersed amongst the community. Whilst this may result in price rises for short-term accommodation in some areas, there are other economic benefits that would flow from such rise in demand including job creation.

Suggestions have been made regarding the construction of temporary worker housing to accommodate the construction workforce. Whilst feasible this is considered a secondary mitigation. Should the targets for local workers be achieved (either in whole or large part), and the existing market not be able to meet demands, temporary worker accommodation would be required. As the construction program is less intensive within the first 6-12 months this would allow an adequate period of monitoring to determine whether the local employment targets as well as the existing accommodation provision was adequate. As a last resort, Northern Pathways would develop a strategy for temporary worker accommodation

during the first year of construction. This strategy would detail the type, extent and location of accommodation and be developed in consultation with Clarence Valley Council. As any temporary worker accommodation would effectively co-locate large numbers of workers, it is considered that this would only be proposed as a last resort measure as it would not create the same benefits for the local economy as strategies to employ locals and utilise existing businesses.

It is understood that temporary worker accommodation is being considered at Yamba to service the Pacific Highway upgrade project. The NGCC project would not locate any temporary worker accommodation (if required) in Yamba to ensure there are no further cumulative impacts caused by the construction and operation of such temporary worker accommodation.

Recommended mitigation measures to address this issue are summarised in section 6.

EIS Exhibition Submissions and Targeted Phase 2 Stakeholder Engagement

Some public submissions received during the exhibition of the Stage 2 EIS raised concern with the cumulative impact of the major infrastructure projects on the rural lifestyle (refer to Table 2).

Likewise, as with public submissions, neighbour concerns were raised during the Phase 2 stakeholder engagement activities, in relation to the cumulative impact of the major construction projects. In response, participants requested that construction activities and roadworks are coordinated, well-planned and sensitive to how residents and graziers use the roads.

The indirect impacts of incoming workers and families on the availability of housing was also raised by stakeholders as well as concern with meeting local employment targets and local job opportunities.

The following strategies were suggested by participants for consideration in reducing the cumulative impact on the local and broader communities:

- A coordinated process to offer long term employment to counter short term construction cycles, such as linking existing employees to work and early notice of the commencement and closure of jobs.
- Development of a public construction calendar with advanced notice of the skills and qualifications required, as well as procurement packages.
- Early listing of available jobs to encourage younger people to stay in the area.
- Creation of a rental directory and liaison with existing accommodation providers to identify accommodation provisions for workers (if required).

- Coordination with other nearby large projects to mitigate the cumulative impact of construction works.

Recommended actions/strategies

As a result of the additional stakeholder engagement it is recommended that the following measures are adopted to strengthen the mitigation measures identified in the Stage 2 EIS:

- Development of a public construction calendar with key dates identified that advise relevant communities on timing of projects along with advanced notice of skills and qualifications required, as well as procurement packages to increase local employment and supply opportunities. It is recommended this be coordinated with local social media pages, the Clarence Valley Roundtable, subcontractors and training and employment providers.
- Maintain established relationships with nearby large infrastructure project teams to coordinate and mitigate the cumulative impacts of projects. It is also recommended the Project Managers of the construction projects meet on a fortnightly basis to coordinate activities and minimise impacts on local residents.
- Prioritise the early informing of local businesses of quantities of goods that are required for project phases in order for businesses to pool resources or build consortiums.
- Monitor local worker participation targets and vacancy rates of short-term accommodation providers throughout the Clarence Valley. Should there prove to be a lack of local participation and availability of short-term accommodation, develop a strategy for short-term accommodation provision. This strategy is to be developed in consultation with Clarence Valley Council no later than 6 months following the start of construction.
- In recognition of the importance of safeguarding community benefit, during a time of significant construction, it is recommended that NorthernPathways works with the nearby large infrastructure project teams, to coordinate community contribution projects. These could include community picnics, sporting events and open days, the Jacaranda Festival and concerts. The coordinated contributions will also assist in engaging with the community about the progress of the major infrastructure projects.

4.1.3 Change in Character of the area and measures to mitigate the impacts

As discussed in the SIA prepared to support the Stage 2 EIS, the rural/natural character of the region was identified as a widely held community value within strategic documents as well as through engagement with local residents. The

ambience of the town and lifestyle on offer, along with its idyllic natural surroundings, close to the river and coast, have been identified as important attributes of the area and therefore a consideration that may be threatened by the external effects of the building and construction process and operation.

As outlined in the SIA, measures to mitigate potential local character impacts included:

- Early planting of advanced and fast growing native trees on the site perimeters that would be in character with the existing rural character.
- Design of the buildings in a rural vernacular with a colour scheme that is muted, respecting the natural contours of the site with buildings falling away either side of the ridge. In addition, the design of the lighting system aims to minimise spill.
- Engagement with immediate neighbours in relation to concerns of safety of the family and children with identification and establishment of acceptable measures that can be implemented during both construction and operation to ensure safety of the area is maintained.

EIS Exhibition Submissions and Targeted Phase 2 Stakeholder Engagement

Public submissions received in relation to the exhibition of the Stage 2 EIS identified concerns with the impact of the proposal in relation to the development being out of character with its surroundings (noted to be in a rural zoning), creating an impact on the rural landscape and a loss of local character. In addition, the Phase 2 stakeholder engagement undertaken identified that the potential shift in the rural ambience of the area was a key impact identified by directly affected landowners and neighbours. In addition, the management of inmate visitors was raised as a concern. The following strategies were suggested by participants for consideration in mitigating the impacts of the character of the area.

- Maintenance of existing stock route through implementation of a stock management plan that clarifies where stock can be moved, with road signs on Avenue road with 'designated stock route'.
- Incorporation of waiting areas for those being released inside the NGCC to allow flexibility to coordinate release.
- Establishment of a free facility at the NGCC or in town, to provide a waiting space for visitors, particularly for those with children, that could be created together with subsidised accommodation for visitors from low socio-economic backgrounds.

Recommended actions/strategies

Following the Phase 2 engagement the recommended strategies include:

- NorthernPathways is work with Transport for NSW to determine the viability and subsequent options available to establishing a bus service to the facility prior to the opening date. It is recommended that ongoing construction progress updates are provided to Transport for NSW to ensure planning and funding allocation is aligned with the operational timeframes.
- Continuation of a communications and stakeholder manager role to ensure communication between stakeholders and NorthernPathways project team remain open beyond the onset of the project. It is noted that during operation the General Manager has overall responsibility for the management and coordination of stakeholder relationships.
- Coordination with other nearby large projects to mitigate the cumulative impact of road works and major projects in the locality.

4.1.4 Details regarding potential anti-social behaviour of visitors and management of impacts on adjoining neighbours (operational management plan)

Additional matters raised in submissions related to:

- Serco as the chosen operators.
- Anti-social behaviours associated with existing Grafton Correctional Centre.
- Ensuring rehabilitation programs for inmates are appropriate and forward thinking.
- Consideration of demand for services, particularly the importance of establishing strong linkages with outside organisations and the proactive follow through of treatment plans and programs that begin within the centre. Ensuring strong relationships are established between community organisations and community correctional services was seen as an important way in which relief can be provided to local community organisations.

Comment and Recommended actions/strategies

Serco is a leading, worldwide, correctional facility operator, currently operating ten correctional facilities in Australia, New Zealand and the United Kingdom. This includes the recently commissioned Auckland South Correctional Facility in New Zealand, delivered as an operator-led PPP with John Laing and Macquarie Capital. In relation to the NGCC Serco is committed to implementing the Serco Pathways

Model which will provide a framework to assess all critical factors in reducing the risk of re-offending, targeting these factors for each individual Inmate's rehabilitation journey. The totality of the Inmate's Pathway Plans will form the Inmate's Case Plan.

As outlined in the SIA, Grafton has had a major correctional centre operating for many years (the Old Grafton Gaol opening in 1893 and operating continuously until its downsizing in 2012 and then reopening as a full corrections centre in 2015). As such, the discussion of impact on existing corrections services with the existing Grafton Correctional Centre staff as well as Grafton Police was an important element in understanding the likely impacts associated with the opening of a new correctional centre. Presentations and meetings were held with key stakeholder groups, including Grafton Police and it was noted that whilst there may be some increased need for more presence, no significant issues of concern raised in relation to increased anti-social behaviours as a result of the establishment of the NGCC.

Concerns of potential crime risk were raised in relation to the number of visitors passing through the area, citing concern as to increased vulnerability to theft or other crimes. Recommended strategies incorporated within the SIA noted that the Community Consultative Committee was to monitor the impacts on local residents during construction. In addition the operator is to continue to engage with adjoining landowners in relation to procedures and protocols in the event of any incident requiring NSW Police attendance. This will include the establishment of notification procedures to notify residents in the occurrence of an escape, potentially through the provision of a direct line to the correctional centre security. The operator is also to establish strategies with the Grafton Police Station to manage incidents and inmate transport.

As outlined in the SIA prepared to support the Stage 2 EIS a number of measures have been proposed to minimise the effect on facilities and services. This includes the development of working relationships between the operator and local welfare and charitable services to ensure the needs of inmates are appropriately met when nearing release. In addition, open communication will allow for strategies to be developed to assist visitors who may require support from local welfare and charitable services when visiting the NGCC. As requested by Clarence Valley Council, the operator is to liaise with Council throughout the operation of the facility in relation to ongoing measures to mitigate any socio-economic impacts.

4.2 Traffic Impacts

The NSW Department of Planning and Environment has requested the following traffic impacts to be addressed:

- Demonstrate road safety along designated access routes would not be adversely impacted by construction and operational traffic generated by the development.

- Provide further analysis of operational traffic impacts and traffic efficiency over a 10 year horizon following commencement of operations.

4.2.1 Impacts on road safety along designated access routes of construction and operational traffic

Prior to construction commencing for Stage 2, it is expected that a detailed Construction Traffic and Pedestrian Management Plan (CTMP) would be prepared in consultation with Clarence Valley Council, the RMS, Pacific Complete and the immediately adjoining local residents and would include a road safety audit and measures to mitigate any safety risks for this stage of the construction works.

4.2.2 Provide further analysis of operational traffic impacts and traffic efficiency over a 10 year horizon following commencement of operations.

The traffic generated by the NGCC in Year 10 would be the same as Year 1. The Pacific Highway upgrade would be completed prior to the facility opening and consequently the traffic volumes along the existing Pacific Highway would be significantly reduced and capable of accommodating traffic flows from the development. Currently, on average, a peak of around 9,800 vehicles uses the existing Pacific Highway each day. There would be a significant reduction in this flow with vehicles diverting to the new highway creating substantial capacity at existing intersections.

4.3 Impact on Agricultural and Farming Activities

The NSW Department of Planning and Environment has requested the following impacts to be addressed:

- Provide further consideration of how the proposal would directly and indirectly impact surrounding agricultural and rural farming activities (including moving stock, pest control and use of firearms). Provide details of the mitigation measures required to manage conflict where impacts cannot be avoided.
- Provide details regarding what procedures would be implemented at the correctional centre to address impact on operations whilst stock are being moved along Avenue Road where access to the site can be significantly restricted for up to three hours and potentially longer periods during flood events (operational management plan).

4.3.1 Impacts on farming operations

Adjoining and adjacent land uses are agricultural (predominately grazing) and rural residential. The wider area contains horticultural activities such as tea tree farming.

Consultation with directly affected landowners and neighbours indicated that in addition to grazing, farming activities including shooting, and baiting to deal with feral animals and pests.

It is anticipated that the proposed development would not unreasonably impact on farming activities on adjoining or adjacent land undertaken within the law controlling use of firearms, guidelines of the Department of Primary Industries and sound farming practice.

It is understood that the Local Land Services – North Coast is the relevant government authority that is able to assist with the control of wild dogs in and around the Grafton area. It is suggested that any concerns regarding the control of wild dogs in the area be addressed to Local Land Services – North Coast who are able to assist with the management and control of pests including wild dogs.

With respect to the concern regarding baiting, it is noted that Pesticide Control (1080 Bait Products) Order 2017 only prohibits the use of 1080 bait for the control of wild dogs within 150m of a building if the method of baiting is by ground (as opposed to by helicopter or by fixed wing aircraft). Further, the prohibition area can be reduced to 50m with the consent of the owner of the land upon which the building resides. The operator, Serco, is prepared to discuss the provision of consent subject to a requirement that no bait is laid on the corrections centre site and at least 5m away from the boundary as required under the Pesticide Control (1080 Bait Products) Order 2017.

With respect to the use of firearms on land surrounding the correction centre this is governed by a number of acts, regulations, codes and standards including but not limited to the Firearms Act 1996 (NSW), Firearms Regulation 2006 (NSW), Crimes Act 1900 (NSW), the National Firearms Safety Code and any conditions of holding a valid firearms licence. The overriding purpose of the requirements in those documents is to ensure that the legal use of firearms do not cause a danger or risk to persons or property.

The development of a correctional facility on the site does not create any additional requirements for the use of surrounding properties. There is no specific law that prevents the use of firearms within the vicinity of a correctional facility. Rather, the various governing acts, regulations, codes and standards governing the use of firearms apply equally to a correctional centre as to other land uses, e.g. residential, industrial, farming, educational etc.

The generally smaller lot size in the area including the lifestyle blocks mentioned in the submission would need to be considered in relation to any off site impacts of farming activities.

There would be restricted access to the site and in particular the areas on the western side of the site which would not be accessible to visitors. Further, given the

perimeter fencing around the correctional centre, pests such as wild dogs, foxes and rabbits are unlikely to infiltrate into any adjoining or adjacent land from the correctional centre.

4.3.2 Impact on Stock Movement

Avenue Road is used as a stock route in times of flood and at other times as required for stock management purposes. This is by foot and by truck. In times of flood the movement is generally from the flood prone farmland around Ulmarra to the north via Avenue Road to higher ground in the south. Many such movements are by foot, or a combination of trucking to cattle yards on Avenue Road and then walking the cattle to flood free paddocks, and a number of local farmers have flood free paddocks specifically for this purpose. The movement of stock in this manner requires an annual licence from DPI, however in times of emergency licences are not required.

Several landholders have raised concerns about being able to access paddocks via Avenue Road and the right of way on the northern boundary of the site during construction and operation of the NGCC.

Inquiries were made to Local Land Services. Local Land Services advised that there are three known Routine Stock Movement Permits issued for movements along Avenue Road past the site. Local Land Services would not provide the names or copies of the permits.

Average heard walking speed is approximately 3 kms per hour. Information provided in submissions indicate that the distance cattle are moved along Avenue Road south of the property entry (in the direction of Eight Mile Lane) would be 3.5 kms. Thus, the average stock movement would take a little more than an hour along the boundary of 313 Avenue Road. This speed would however, be impacted by the number of vehicles travelling Avenue Road at the time.

There is no accurate information available on the frequency of movement along Avenue Road. In the past 12 months, the contractor for early works for the Pacific Highway bypass, including the upgrade of Avenue Road south of Wants Lane which commenced in July 2017 has reported a small number of movements along Avenue Road. These movements have occurred with cooperation between farmers and contractors.

There are a number of stock movement permit requirements to be observed by farmers including:

- Notification of stock being moved along unfenced public roads is required to be given to all owners or occupiers of the land through or alongside which the stock will pass at least 48 hours prior to commencement of moving stock;

- the permit holder must clearly display stock ahead signs for the benefit of road users;
- If stock is being moved more than one kilometre on a public road, signs are to be placed on the road so that there is not more than 5 kilometres, and no less than 200 metres, between the sign and the place where a vehicle being driven towards stock would first encounter stock. The Permit Holder must ensure that the signs are removed as soon as practicable after all stock have left the road;
- stock warning sign must comply with the specifications as to size, colour and design for T1-19 "Stock AHEAD (Symbolic)" signs that are set out by the Roads & Maritime Service;
- so far as it is reasonably practicable to do so, the stock must be kept off any part of a road which is a bitumen or made up road surface or in relation to a dirt road, any part of the road routinely used by vehicles. Wherever possible, stock should be walked on the areas to the sides of the road where vehicles do not routinely travel, such as, for example, the dirt or grassed sections to the side of a paved road.

It is considered that the movement of stock along Avenue Road can continue during construction and operation subject to the preparation of management plans for the movement of stock. As suggested by the DPI in its submission:

It is important that the movement of stock by surrounding landowners is not hindered by increased traffic movement relating to the project during the construction and operation phase and any potential for conflict risk is minimised. It is noted that the proponent outlines a commitment to consult with affected landowners and to include appropriate mitigation measures within the Construction Traffic Management Plan however more consideration at the operation phase will also be required. It is recommended that Local Land Services be involved in the planned consultation to ensure all parties are aware of their legal obligations and a plan of management that includes appropriate management for road sharing and monitoring of complaints is established.

During the construction phase, the anticipated impacts in relation to stock movements include potential conflicts with construction traffic. As Northern Pathways will be managing construction, it is expected that a large level of control and interaction can be had with both workers to the site and deliveries. To mitigate the impacts to stock movements during construction, Northern Pathways will work with permit holders to ensure stock movements occur unimpeded. This will include:

- Liaising with permit holders regularly to be informed in advance of intended stock movements.

- Notification to staff, sub-contractors and deliveries of stock movement time and location (this will be done through either email or text message notification depending on the amount of prior notice).
- Education of site staff and sub-contractors of the stock movement protocols during site inductions.
- Liaison with neighbours during times of flood to determine whether stock movements will be undertaken and management of construction traffic to accommodate these stock movements.
- Inclusion of the above within the Construction Traffic Management Plan with review cycles to be quarterly in consultation with neighbours and Local Land Services.

During operation the volumes of traffic along Avenue Road would be increased compared to the existing situation, however they would be far less than during construction. Avenue Road would however be upgraded to two-lanes with appropriate width and shoulders. The revised design of Avenue Road would assist in providing adequate space for traffic and stock movements. This would also provide for adequate and safe passing movements at appropriate locations along Avenue Road for staff and visitors to pass the moving stock. Issues to be addressed in managing stock movements during operation include:

- Liaising with permit holders to be informed in advance of intended stock movements.
- Induction of staff to include stock movement education and recommendations for safe driving during these times.
- Notification to staff either by text message or email of intended stock movement. If this is to occur during or close to a shift changeover time, staff are to be advised to allow additional travel time.
- Notification to staff that during times of flood to expect stock movements.
- Notification to visitors that the NGCC is located on a stock movement route and that care and patience should be exercised when visiting the centre. This information will be provided to visitors upon making an appointment for a visit.
- The above will be included in the operational management plan to be developed prior to occupation and updated annually and be finalised in consultation with Local Land Services and stock movers.

Furthermore the experience of managing stock movements during construction would be included in any updates to the above mitigation measures prior to inclusion in the operational management plan.

4.4 Residential Amenity Impacts

The residential amenity impacts as outlined in the Stage 1 conditions of consent are:

- visual impacts,
- privacy,
- noise and vibration,
- odour,
- safety procedures and
- lighting.

The EIS details the anticipated impacts of the above, and the key issues are outlined below:

4.4.1 Visual Impacts

The visual impacts are outlined in Appendix 17 of the report. The assessment demonstrates that with the installation of the landscape buffer the NGCC will be predominately not visible from surrounding residences as well as Avenue Road and the new Pacific Highway. The landscape buffer is considered an adequate mitigation to ensuring negligible visual impacts are experienced from surrounding residences. This buffer is being completed as a component of the Stage 1 consent.

4.4.2 Privacy

The privacy of surrounding residences would be largely retained through implementation of the landscape buffer. The site is bound by Avenue Road to the east and the New Pacific Highway to the south, which reduces the number of directly neighbouring properties. The landscape buffer is considered an adequate mitigation to ensuring negligible privacy impacts are experienced from surrounding residences. This buffer is being completed as a component of the Stage 1 consent.

4.4.3 Noise and Vibration

The Stage 2- Environmental Noise and Vibration Assessment demonstrates that there will be no vibration impacts as a result of the proposal in both operation and

construction for surrounding residences. This report also concludes that noise impacts for construction will comply with the noise management level of 58 dBA. A Construction Noise and Vibration Management Plan will be developed prior to commencement of construction to address noise during construction.

The assessment of operational noise has concluded that noise impacts associated with the operation of the facility have been considered and will be less than the operational noise criteria during the day and night. Mitigation measures for managing noise during both construction and operation have been developed.

4.4.4 Odour

The effluent management system proposed has been designed to comply with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (DEC, 2005) guidelines. Based on preliminary odour modelling it is anticipated that no odour impacts would be generated by the proposed system.

During the detailed design process for the system, confirmation of odour modelling will be undertaken. In the unlikely event that the modelling demonstrates that an odour impact is likely, tanks would be enclosed or located within a larger shed and fitted with odour extraction and scrubbing systems. It is expected that such a mitigation measure would ensure odour impacts are appropriately controlled.

4.4.5 Safety Procedures

Safety procedures in relation to the operation of the NGCC are outlined in section 6.3.5 of the EIS. The NGCC has been designed with the appropriate security features as required of a correctional centre in NSW.

In response to concerns of directly affected land owners and neighbours, direct lines of communication will be established with the operator and outlined in the Operational Management Plan to be developed prior to occupation. Further mitigations include continuation of a community consultative committee for the project to facilitate interaction with surrounding land owners and neighbours, the wider Clarence Valley community and the management of work release for minimum security inmates.

4.4.6 Lighting

The EIS includes a Built form and Visual Amenity Report at Appendix 17. This report demonstrates that with the proposed landscape buffer, the impacts of light spill will be either negligible or not apparent from neighbouring properties and along Avenue Road and the Pacific Highway. The proposed mitigation measures as contained in the EIS is considered adequate to address this issue. Further the Stage 1 Assessment

Report by DPE notes 'The vegetative buffer is also considered appropriate to assist in mitigating the visual and amenity impacts'

The mitigation measures to address these impacts are contained in Section 6 of this report.

4.5 Directly Affected Land Owners and Neighbours

Further consultation was undertaken with Directly Affected Land Owners and Neighbours (DALN) during the EIS exhibition. These stakeholders are most likely to be impacted by the NGCC project and as such targeted consultation was undertaken. The range of issues raised by DALN was similar to issues raised during the consultation process undertaken for the Stage 1 development application.

Table 5 below details the issues raised by DALN as a result of consultation both prior to and during the EIS exhibition. The table includes a response to the issues by the Proponent, which clarifies whether an impact is perceived or could be expected as a result of the development. Where the issues are expected to result in an impact, mitigation measures as outlined in Section 6 of this report would apply.

Table 5 DALN issues raised during consultation

DALN Issue	Response
Light spill from the new correctional facility	The EIS includes a Built form and Visual Amenity Report at Appendix 17. This report demonstrates that with the proposed landscape buffer, the impacts of light spill will be either negligible or not apparent from neighbouring properties and along Avenue Road and the Pacific Highway. The proposed mitigation measure as contained in the EIS is considered adequate to address this issue. Further the Stage 1 Assessment Report by DPE notes 'The vegetative buffer is also considered appropriate to assist in mitigating the visual and amenity impacts'
Traffic from construction	DALN expressed concern regarding road safety with respect to construction traffic. It is noted that the upgrade of Avenue Road will be completed by the time construction for Stage 2 is anticipated to commence. This will provide a two-lane sealed roadway for the length of Avenue Road between Eight Mile Lane and the Site. A road safety audit will be conducted prior to commencement of construction and the results included in a Final Construction, Traffic and Pedestrian Management Plan (a draft of which is contained at Appendix 13 of the EIS). This plan will be developed in consultation with the contractor responsible for the W2B project and permit holders for stock movements along Avenue Road. The Plan includes provision for all construction

	traffic to use approved construction routes and requirements in respect of driver behaviour.
Noise from construction	<p>The Stage 2- Environmental Noise and Vibration Assessment considers that construction will comply with the noise management level of 58dBA.</p> <p>Despite this conclusion the Proponent commits to managing noise during construction through a Construction Noise and Vibration Management Plan. The requirements for inclusions of this plan are outlined in Appendix 15 of the EIS and this plan will be developed prior to commencement of construction.</p>
Traffic from operation causing an increase in traffic on local roads from staff and visitors, potential conflict with stock movements and concern regarding use of Avenue Road to the north of the site.	<p>In accordance with the approved Stage 1 DA, access to the site will be via Eight Mile Lane and Avenue Road. Avenue Road is currently being upgraded to a two lane road. The Stage 2- Transport and Accessibility Report submitted with the EIS confirms that Eight Mile Lane and Avenue Road (as upgraded) will operate within the road classifications and intersections will operate satisfactorily. As such no mitigation measures are provided in relation to traffic volumes during operation. The interaction of operational traffic and stock movements is discussed further at section 4.3.2 of this report.</p> <p>As outlined in the EIS, the proposed vehicular access to the NGCC is:</p> <ul style="list-style-type: none"> • From upgraded Pacific Highway south, exit to old Pacific Highway, turn into Eight Mile Lane and then Avenue Road; • From upgraded Pacific Highway north, exit to Eight Mile Lane and then Avenue Road; • From Grafton use old Pacific Highway, exit to Eight Mile Lane and then Avenue Road; • From NGCC use Avenue Road, then Eight Mile Lane and ramp to upgraded Pacific Highway north, old Pacific Highway to Grafton or ramp to upgraded Pacific Highway south. <p>These routes provide the most direct, safe and fastest routes to the NGCC. The only trips that would potentially access the site from further north along Avenue Road would be trips commencing at Ulmarra.</p> <p>The Operator will support the proposed vehicular access points by requiring all staff to access the site via these routes where it represents the most direct route to site as part of their Work Health and Safety requirements.</p> <p>Visitors to the site will receive information on travel routes to the site by the Operator when a visit is arranged.</p>
Noise from	The Stage 2- Environmental Noise and Vibration Assessment

operation	<p>concludes that 'noise impacts associated with the operation of the facility have been considered and will be less than the operational noise criteria during the day and night.'</p> <p>Despite this conclusion the Proponent commits to managing noise complaints through the operational management plan to be developed prior to occupation.</p>
Loss of property values	<p>As per the approved Stage 1 DA, property values are not a valid planning consideration. This was endorsed by DPE in the Stage 1 Assessment Report which stated 'it is an established principle that the impact of a project on surrounding property value is not a planning consideration (refer e.g. <i>Trinvass Pty Ltd and Anor v Council of the City of Sydney [2015] NSWLEC 151, [89]</i>).'</p>
Impacts to agricultural activities and agricultural business activities	<p>The Proponent understands that the issue of impacts to agricultural activities relates to perceived impacts in terms of use of firearms and baiting.</p> <p>Details regarding the impacts on agricultural activities are contained in section 4.3.1 of this report.</p> <p>Impacts in relation to stock movements as an agricultural activity is discussed at section 4.3.2 of this report.</p>
Perceived loss of personal safety arising from NGCC visitors	<p>The Proponent notes that association with an inmate should not infer that person as being a criminal or someone who partakes in criminal activity.</p> <p>The Social Impact Assessment submitted with the EIS notes that post occupancy reviews for both Kempsey and South Coast Correction Centre noted that crime had either stabilised or trended downward since development of the correction centre (section 4.6.2.6 of Appendix 24 of the EIS- Social Impact Assessment).</p>
Loss of amenity to rural lifestyle	<p>As the area includes a mix of farming and rural lifestyle residences, the amenity of rural lifestyle in this location contains two aspects- residential amenity impacts and impacts on agricultural activities.</p> <p>The Stage 1 Assessment Report by DPE notes that 'these landscaped setback areas together with controlled noise and lighting activities and upgraded access roadways, where required, would ensure the operations of the correctional centre do not detrimentally impact on surrounding agricultural activities and the rural amenity of the area.'</p> <p>The Assessment Report further notes that '<i>the Department considers the use of the land for correctional facilities acceptable as the site is not mapped as regionally significant farmland in the mapping undertaken for the Mid North Coast Farmland Mapping Project 2008.</i>'</p>

	<p>In accordance with the Stage 1 conditions of approval, residential amenity impacts were further developed within the EIS. Section 4.4 of this report details the consolidated findings in relation to residential amenity impacts.</p> <p>Section 4.3.1 details the consolidated findings in relation to agricultural activities.</p> <p>Updated mitigations measures have been provided.</p>
Environmental impacts on flora, fauna and sensitive ecosystems	<p>The Project's impacts on flora, fauna and sensitive ecosystems are detailed in Appendix 3 to the EIS. The biodiversity impacts of the project were largely assessed as part of the Stage 1 DA. DPE concluded in the Stage 1 Assessment Report that It is considered that the proposal would result in the loss of biodiversity values on the site but the impacts can be adequately compensated. Appendix 3 to the EIS is consistent with the Stage 1 approval.</p>
Project approvals, site selection, flood and bushfire risk and lack of infrastructure	<p>The issue of site selection was dealt with as part of the Stage 1 approval. The DPE Assessment Report notes 'the Department considers that the proposed location of the new correctional centre is justified. '</p>
Stock movement along Avenue Road	<p>Refer to section 4.3.2 of this report.</p>
Runoff of wastewater from the site, particularly in times of flood	<p>The Wastewater Management Plan at Appendix 10 of the EIS outlines the provisions in relation to runoff. The Plan concludes that runoff is highly unlikely due to the provision of adequate runoff area within the site, including emergency runoff provisions.</p>
Route for power lines to the site and need for electricity as opposed to use of renewable energy sources	<p>The selection of a route for electricity provision to the site is being undertaken by INSW under a separate planning approvals process.</p> <p>Whilst renewable sources of electricity may be feasibly developed at the site, the correctional centre requires a steady reliable power source. As such electricity will need to be provided to the site through transmission lines.</p>

4.6 Effluent Management

The NSW Department of Planning and Environment has requested the following effluent management issues be addressed:

Table 6: Effluent management issues and response

Issue	Response
<p>Provide a revised wastewater management plan to address nutrient removal from the site and monitoring details in accordance with matters raised by the NSW Environment Protection Authority and Department of Primary Industries.</p>	<p>This revised plan has been prepared addressing matters raised by authorities and is contained in Appendix 3.</p>
<p>Clearly demonstrate that the proposed intended on-site effluent management system and irrigation areas include appropriate buffers to vegetation areas, any approved dwellings on adjoining land and site boundaries.</p>	<p>The drawing contained in Appendix 4 indicate the buffers provided.</p>
<p>Provide clarification regarding whether any off-site discharge or re-use is proposed, particularly any procedures to manage 'rare wet weather events'</p>	<p>No off-site discharge or reuse is proposed. The management of the wet weather storage lagoon to avoid and mitigate overflows is provided in the RWMP (refer Appendix C2 – Pond Management Strategy, and Appendix E1 – Incident Response and Contingency Management) contained in Appendix 3</p>
<p>Provide exact quantities of sodium hydroxide and sodium hypochlorite to be stored on the site to confirm whether the total quantity of dangerous goods to be stored on the site are below screening thresholds to demonstrate that a preliminary hazard analysis is not required.</p>	<p>For the proposed Grafton wastewater treatment plant, the following quantities are estimated:</p> <ul style="list-style-type: none"> • Caustic (sodium hydroxide, 30% w/w): ~1t/month usage, storage of ~2t on site • Sodium Hypochlorite (Chlorine, 12.5% w/w): ~3.5t/month usage, storage of ~5t on-site. <p>Sedgman advise that the site is not considered potentially hazardous based on the storage screening assessment and transport screening assessment.</p>

4.7 Aboriginal Cultural Heritage Management

The NSW Department of Planning and Environment has requested the following be addressed:

- Provide details of how those who hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places within the site have been consulted to understand the proposal and details of any involvement in the design process to address potential social and cultural impacts of the development.

This is discussed in Section 4.1.1 above.

4.8 General

4.8.1 Addendum soil report.

DPE requested a complete Addendum - Soil Suitability for effluent disposal report prepared by Jacobs as a number of figures and the appendices have not been provided. This report was a draft report and has been superceded by more detailed geotechnical and soils investigations contained in Appendix 5.

4.8.2 Water

DPE states that adequate water supply during construction has been raised as an issue as a result of current Stage 1 works and requested advice on supply for Stage 2 construction works.

INSW works are underway for the future potable water supply to the site. The works are currently expected to be completed in 4th quarter 2017 with supply available to site that would be sufficient for construction needs.

In the event there is interruption in supply, alternative sources would be available. For example, Clarence Valley Council have identified a potential supplementary source for recycled water at Clarenza in addition to potential on-site (groundwater) uses.

5. Clarifications

5.1 Clarification of ancillary construction activities

Submissions received during exhibition, including EPA, requested clarification on the proposed batch plant and operations including likely mitigation and management measures.

Mobile concrete batching plants and pre-cast facilities will be used during construction as referred to in the EIS in the Construction Environment Management Plan (Appendix 12), Construction Traffic Management Plan (Appendix 13), Environmental Noise and Vibration Assessment (Appendix 15), Transport and Accessibility Report (Appendix 19). Currently the project has identified a need for two facilities however, a third maybe required following further market feedback.

Concrete derived products form a key component of the Stage 2 development. Daily production at peak in construction would be:

- **Precast Production** - 5,766m³ for onsite precast works or 13,838 tonnes
- **Insitu Works** - 14,436m³ which equals 34,648 tonnes
- Maximum quantity (m³) of concrete produced each day for onsite pre-casting - (i.e. utilising the Batch Plant), = **250m³ to 400m³**
- Maximum quantity (m³) of concrete produced each day for onsite concrete casting, slabs footings etc, = **350m³ to 600m³**
- Total combined quantity (m³) of concrete produced each day via the onsite Batch Plant, = **700m³ to 1100 m³**
- Total quantity converted to Tonnes, = up to **2648 tonnes/day**

The plant would also supply concrete for constructing drainage and structures.

To deliver the project, a range of different concrete mixes would be required which could only be partially supplied within the local market. Further, the design and construction methodology sees the introduction of pre-cast units and as such, on-site batching provides significant benefits when positioned alongside the pre-cast yard.

Proposed activities would be undertaken within the footprint established under the Stage 1 approval and amended by Stage 2. The location broadly is to the south of the property and utilises the pad and drainage infrastructure that would be converted for the future wastewater plant and would not require additional clearing and/or ground disturbance for this activity.

Batch plant facilities are modular in nature and mobile, which will require no foundations or commissioning periods and enables convenient movement and quick installation as required to suit the procurement and delivery of the project.

The batching unit, aggregate conveying unit, water supply and additive agent supplying system, scaling system, mixing system, electrical control system and pneumatic system are all centralised in one mobile trailered chassis. Perfect mixing can be achieved effectively within computerised program demands for dry-hard, half-dry-hard, plastic and concrete with any mixing ratios with minimal impact to the environment.



JHG Modular Mobile Concrete Mixing Plant

A typical concrete batching plant requires a land footprint of approximately 0.5 ha to accommodate cement materials silos, aggregate storage bins with dust suppression systems, conveyor belt (with cover) from aggregate storage bins to surge bins and drum mixer, drum mixer, water holding tanks, fuel tanks, materials storage facilities, truck holding bays, a generator and holding rooms, and any required staff facilities (office, ablutions, etc).



Extract completed system

Temporary mobile concrete mixing plants will produce a combination of products including:

1. 'dry mix' cementitious products for stabilisation of site access roads, swales and building platforms outlined as preparatory works;
2. 'wet mix' (concrete) for construction of auxiliary facilities and ancillary structures associated with construction of roads such as crossovers, concrete pavements, concrete kerbs, headwalls, pits and field & kerb inlet gullies;
3. Stockpiles of materials for the production of dry mix cementitious products and concrete will be suitably managed in large steel bins (containers) or alternatively, in a like manner to those stockpile sites already described within the EIS;

The plant types and would align directly with the construction program and requirements of the Contractor and would range from a combination of both plant types to a single mix operation.

It is noted that key issues associated with batching facilities are linked to air quality, water quality and traffic.

During the construction phase, pollutants from batching such as sediment, soil nutrients and construction waste have the potential to enter drainage lines and

stormwater systems, particularly during high rainfall events. Spillage of diesel during refuelling and leakage of hydraulic and lubricating oil from plant and equipment, or rinse water from plant washing and concrete slurries, also have the potential to enter drainage lines if not managed in the right manner.

Wastewater generated from batching would be discharged and transported to holding pits, which will form the future holding ponds for the wastewater treatment plant. This arrangement will encourage heavy sediment fallout.

Some recycling of wastewater will occur within the system and/or on-site provided water quality requirements can be met. Sediment within the pit will be removed, dried and reused on site or disposed of to a licensed landfill.

The noise levels that are predicted to occur as a result of the site are in the order of 38dB(A). The EIS predicted noise level of construction works associated with Stage 2 would not exceed 58dB(A). Therefore, the operation of the temporary concrete batching plant is predicted to be inaudible. It should be noted however, that this level, is based on background noise levels prior to the commencement of construction (and future operation) of the Pacific Highway, which is currently under construction along the southern boundary of the property which is likely to further mask activities.

The operation of each batch plant will also require several truck movements associated with raw material supply and for production and delivery. The cumulative impacts of on-site batch plants would result in a net reduction of the overall number of truck movements on local roads compared to off-site batch plants.

Details of the wastewater treatment stream for each temporary plant will be provided prior to commissioning and will be incorporated into the CEMP. Dust and solid waste issues will be managed through implementation of the CEMP. The acoustic impacts of the plant operation have been assessed and found to be acceptable. Traffic impacts of on-site batching and pre-cast activities have been assessed with an overall reduction in traffic movements resulting. Proposed mitigation measures are detailed in section 6.

5.2 Hours of Construction

Following a review of construction programming, the Project requests the hours of construction be extended on Saturdays. The assessment as contained in the EIS utilises the hours of construction as contained in the Interim Construction Noise Guideline (ICNG) , Department of Environment and Climate Change, 2009. Under the ICNG the standard construction hours for Saturdays are 8am to 1pm.

The Proponent is seeking to vary the construction hours on Saturday to 8am to 5pm to allow the advancement of the construction program and thereby reduce the duration of impacts for surrounding residents. The additional 4 hours of work on Saturdays will enable construction to be advanced due to:

- Ability to be able to spread work throughout the daytime period, which is essential in summer months where some works are limited during the middle of the day. This will assist in allowing works to occur in the cooler morning and afternoon periods.
- A potential 2 month saving in the construction program through the ability to utilise Saturdays as a full work day. If Saturday hours are restricted to 8am-1pm this will limit the ability to undertake works such as concrete pours which require longer durations.

The Proponent notes there is valid precedent for extended work hours on a Saturday as compared to the ICNG hours, notably:

- The Woolgoolga to Ballina Pacific Highway Upgrade project (SSI 4963) has approval to work 8am-5pm on Saturdays
- The Clarence Valley Council standard construction hours are 7am-6pm six days per week.

Given the above it is considered reasonable that the NGCC project receive approved construction hours of 8am-5pm Saturdays to align with Council requirements.

The additional works proposed on Saturdays will include all construction activities proposed within the EIS. The main impacts related to construction activities include noise and traffic. The noise assessment confirms that construction activities would comply with the noise management level of 58 dBA at the nearest receptor. Further the anticipated noise generated by construction would be further reduced once the masonry perimeter wall is erected. As such no unreasonable noise impacts are expected as a result of increased construction hours on Saturdays.

The traffic impacts associated with extended construction hours on Saturdays are not expected to be increased from standard construction hours as outlined in the ICNG. The peak workforce movement would instead be altered from 1pm to 6pm on Saturdays, however this would not result in an increase in traffic being generated from the site.

The existing mitigation measures contained in section 6 of this report are considered adequate to apply to extended construction hours of 8am to 5pm on Saturdays.

5.3 Potential Out of Hours Work

Any works proposed out of approved construction hours would be undertaken in accordance with an 'Out-of-Hours Work Protocol' as detailed in Appendix 15 of the EIS. It is envisaged that the following works may be required to be undertaken outside of approved construction hours:

- Commissioning.
- Deliveries to site.
- Craning operations such as lifting cells into place.
- On-site plant operation and maintenance (for example batching).
- Casting concrete (pouring slabs) and pouring for base slabs, paving and associated cutting and curing works.
- Internal fit out of buildings and structures.
- Construction activities during daylight savings (6am to 7pm instead of 7am to 6pm). The Woolgoolga to Ballina Pacific Highway Upgrade project (SSI 4963) has an approval to work these hours for sparsely populated areas (similar to the surrounding environment).

The Construction Noise and Vibration Management Plan would include the Out of Hours Works Protocol which would include processes for notification of impacted receivers, consultation, monitoring and mitigation processes.

The plan would be developed in consultation with EPA and the Department.



6. Updated commitments to mitigation

In response to the consultation activities and submissions, a number of commitments have been made as outlined in the EIS and in this report. Table 23 of the EIS summarises the potential environmental impacts which may arise as a result of the proposed development and, where relevant, identifies the mitigation measures that will be undertaken. These mitigation measures have been updated following the review of submissions and are presented in Table 7.

In addition a number of commitments have been made in relation to the Project. These commitments are summarised in Table 7 below, and detail the current and future commitments in relation to the project, particularly where the outcome is outside the control of the Proponent.

Table 7: Mitigation Measures

ID	ISSUE	MITIGATION MEASURE	TIMING
G1	Concept and Stage 1 Approval	The Stage 2 Project would be designed generally in accordance with the requirements detailed in Condition B2, Schedule 2 of the Stage 1 consent including gross floor area.	During detailed design.
C1	Communications	The Proponent will appoint a communications manager who will be the point of contact for the community during construction. It is noted that the community engagement manager is already engaged on Stage 1 of the project and will be responsible for administering a Community Communications Plan during construction.	Prior to Construction
C2	Communications	The Proponent will appoint a responsible officer who will be the point of contact for the community during operation.	Prior to Operation
C3	Communications	An Operational Management Plan will be developed that will include direct lines of communication with residents in the immediate surrounding area, and this plan will be developed in consultation with those residents. The plan will include security procedures in the event of emergency and protocols for notification of surrounding residents	Prior to Operation
C4	Communications	A community consultative committee would be established by the operator to facilitate management of work release minimum security inmates and to facilitate interaction with the surrounding community and the community of Grafton and the Clarence Valley.	During Operation
C4	Communications	The Proponent would develop the Construction Noise and Vibration Management Plan in consultation with the Community Consultative Committee and local residents prior to construction.	Prior to Construction
Co1	Construction Impacts	The Proponent will develop a Construction Environmental Management Plan (CEMP) for the project.	Prior to Construction

Co2	Construction Impacts	Should local worker participation targets not be met, the Proponent will develop a Short-Term Accommodation Strategy no later than 6 months post commencement of construction. The strategy would be developed in consultation with Clarence Valley Council and accommodation providers.	During Construction
CH1	Aboriginal heritage	The approved <i>Aboriginal Cultural Heritage Management Plan (ACHMP)</i> would be implemented for the duration of Stage 2 activities.	During Construction
CH2	Aboriginal heritage	The unexpected finds protocol as detailed in the ACHMP would continue to be implemented during site operations.	During Operations
CH3	Aboriginal heritage	A project specific Aboriginal Participation Program will be developed prior to commencement of construction that will target higher than 8% indigenous participation.	During Construction
CH4	Aboriginal heritage	An Operator's Reconciliation Action Plan will be developed to target 8% indigenous employment and develop partnerships with local indigenous representatives.	During Operation
CH5	Aboriginal heritage	An Aboriginal Cultural Working Group will be established to build productive partnerships with local industries, NGOs and service providers, traditional land owners and Aboriginal groups to promote regional economic and social development as well as rehabilitation and reintegration programs for inmates.	During Construction and Operation
CH6	Aboriginal heritage	The Project will Conduct quarterly Yarning Circles in order to encourage and support local Aboriginal participation in the workforce and develop strategies for ongoing incorporation of cultural programs into the operations of the facility	During Construction and Operation
Cu1	Cumulative impacts	The Project would continue to liaise with Pacific Complete during construction to manage impacts such as construction traffic and accommodation stress arising from non local workforce participation	During Construction
CT1	Contamination	A Construction Environmental Management Plan would be developed that includes an unexpected finds protocol and details of the site induction for unexpected finds during the earthworks phase.	Prior to Construction

WP1	Water Pollution	A final Recycled Water Management Plan (consistent with the Draft Recycled Water Management Plan- Appendix 3 of this Response to Submissions) would be developed prior to operation. The plan will outline: Processes for monitoring nutrients/ runoff and adaptive management of irrigation across the site	During Operation
WP2	Water Pollution	Chemicals and hydrocarbons will be maintained within bunded area(s) with impervious floors. Maintain spill kit(s) on site at all times, and ensure all staff are appropriately trained in their use. Storage of minor quantities of hazardous chemicals / fuels to be undertaken in accordance with AS1940 – The storage and handling of flammable and combustible liquids and AS3780-2008-The storage and handling of corrosive substances.	During Operation
WP3	Water Pollution	The Project will implement a stormwater management plan including measures to control and treat run-off and overflows in wet weather events.	During Operation
FF1	Flora and Fauna	A Landscape Management and Vegetation Restoration Plan will be prepared and implemented during Stage 2 works.	Construction
FF2	Flora and Fauna	Establishment of no-go zones, fencing and measures as per <i>Flora and Fauna Management Plan</i> developed for Stage 1 would be implemented for Stage 2 construction.	During Construction
FF3	Flora and Fauna	The Stage 2 Construction Environmental Management Plan will require all construction staff working on the project to be aware of the ecological sensitivity of the bushland in the site induction.	Prior to Construction
FF4	Flora and Fauna	The Project will locate temporary infrastructure (plant sites and construction offices, access tracks etc.) in cleared areas away from vegetation to minimise vegetation removal.	During Construction
FF5	Flora and Fauna	The Project will locate and upgrade any access tracks in a manner that minimises the removal of mature trees, hollow-bearing trees and dead trees.	During Construction
FF6	Flora and Fauna	The Project will accurately and clearly mark out the limits of clearing (where appropriate) and the trees/vegetation to be retained outside of the construction footprint.	Prior to Construction

FF7	Flora and Fauna	An experienced and licensed wildlife carer and/or ecologist is to inspect habitat should vegetation be removed (e.g. after a tree is felled). Animals that emerge would be captured, inspected for injury then relocated to predetermined habitat identified for fauna release. Suitable release sites are recommended in bushland to the west of the site.	During Construction
FF8	Flora and Fauna	Any uninjured nocturnal fauna encountered should be held in a dark, quiet, warm, well ventilated box or carrier for release the following night.	During Construction
FF9	Flora and Fauna	Wildlife Information, Rescue and Education Services (WIRES) Clarence Valley (Ph: 1300 094 737) should be consulted if any injured fauna are encountered.	During Construction
FF10	Flora and Fauna	Clearing would be restricted to the footprint required to deliver elements related to the Stage 2 application.	During Construction
S1	Soils	Soil water sensors would be employed in the WWTP irrigation area to ensure irrigation occurs only when the soil is dry enough to accept additional water, without runoff.	During Operation
S2	Soils	Where soil amelioration is recommended (such as the addition of calcium, gypsum or lime) proposed treatment and amelioration will be undertaken in consultation with an appropriately qualified professional.	During Operation
S3	Soils	The Construction Environmental Management Plan will include erosion and sedimentation plans that would be prepared and implemented during the construction program.	During Construction
S4	Soils	Stabilised exposed surfaces as soon as practicable.	During Construction
O1	Odour	Odour emissions to meet appropriate NSW guidelines at sensitive receptors (<i>Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales</i> (DEC, 2005).	During Operations
O2	Odour	The following approach will be utilised during detailed design to assess potential odour emission from the proposed sewage treatment plant, and allow design to be completed so as to meet the odour criteria in O2:	During detail design

O3	Odour	<p>The following approach will be utilised during detailed design to assess potential odour emission from the proposed sewage treatment plant, and allow design to be completed so as to meet the odour criteria in O2:</p> <ul style="list-style-type: none"> - Utilise meteorology generated for the study area; - Estimate odour emissions based on similar capacity facilities; - Model odour emission estimates utilising the CALPUFF dispersion model onto the surrounding environment; and <p>Compare the results of dispersion modelling to the criteria for complex odours and Recommend odour controls if required.</p>	During detail design
O4	Odour	Where required, WWTP tanks would be enclosed or located within a larger shed, and fitted with odour extraction and scrubbing systems avoiding odour emissions.	During detailed design
G1	Groundwater	A groundwater extraction licence would be obtained should groundwater be required for construction and/or operational activities	During Construction
B1	Bushfire Hazard	A 100 m wide APZ will be constructed around the secure perimeter of the maximum and minimum security facilities and maintained	During detailed design
B2	Bushfire Hazard	Construction of external access and internal access roads would provide safe operational access into the site and around the outside of the APZ.	During Construction
B3	Bushfire Hazard	A fire water supply system is to be provided during construction and operation of the correction centre. Water supplies will be provided via a 20,000 L water tank and pump. This will be replaced during operations by a series of stand pipes located at about 200 m intervals along the APZ access track. Electricity and any gas services will be located safely.	Prior to Operation
B4	Bushfire Hazard	The Stage 1 Bushfire Management Plan would be updated to incorporate emergency management procedures for Stage 2.	Prior to Construction
B5	Bushfire Hazard	The Operational Management Plan will include emergency management and response procedures, developed in consultation with service providers.	Prior to Operation
B7	Bushfire Hazard	The Construction Environmental Management Plan will include safe hot work procedures to manage the risk of bushfire ignitions from sparks and naked flames.	Prior to Construction

B8	Bushfire Hazard	Flammable and other hazardous will be stored safely to control risks associated with their ignition during a bushfire event.	During Construction
I1	Biting Insects	<p>The Project would implement the following during detailed design to manage biting insects:</p> <ul style="list-style-type: none"> - drainage paths will be designed with profiles and fall to limit any water retention; - insect screens will be provided to minimum security Residential Buildings; - buildings will incorporate air conditioning to spaces that are mainly occupied with the exception of cells where 'tempered air', i.e. the introduction of cooling when higher ambient temperatures are experienced, will be provided. Stores, plant rooms and other generally un-inhabited spaces will not be air conditioned. 	During Detailed Design
I2	Biting Insects	<p>The Project would implement the following management measures during construction to manage biting insects:</p> <ul style="list-style-type: none"> - disperse water held in depressions and drainage structures; - issue appropriate clothing for those working where high concentration of pests; - issue insect repellents; 	During Construction
I3	Biting Insects	<p>The Project would implement the following management measures during operations to manage biting insects:</p> <ul style="list-style-type: none"> - Regular maintenance of grounds, including irrigation areas and stormwater swales, to limit the build-up of organic matter/dead vegetation and prevent/remove stagnant water (particularly after rainfall) and providing suitable clothing for staff and inmates for outdoor works to protect against biting insects; 	During Operations
I4	Biting Insects	The use of pesticides to control biting insects would only be by exception under strict advice and control to prevent contamination of the adjacent Wetlands area.	During Operations
I5	Biting Insects	Supply air to air-conditioning and for ventilation will generally be filtered and this will limit ingress of biting insects.	During detailed design

NV1	Noise and Vibration	A Construction Noise and Vibration Management Plan would be implemented as part of Stage 2 works and be developed in accordance with the <i>Interim Construction Noise Guideline, Department of Environment and Climate Change (DECC), 2009</i> .	Prior to Construction
NV2	Noise and Vibration	Consultation and notification of works for nearest receivers would occur as per the site communications plan. Notification will identify works proposed, duration and potential mitigation measures.	During Construction
NV3	Noise and Vibration	Any proposed out of hours works would be: a. Assessed to determine if there are any impacts at nearest receivers. b. If works are likely to be audible, residents would be consulted on likely impacts, proposed mitigation and management measures. Monitoring of noise impacts would occur to verify predictions.	During Construction
NV4	Noise and Vibration	An Operational Management Plan will be prepared including procedures for managing noise and noise complaints	Prior to Operation
NV5	Noise and Vibration	During commissioning, the noise levels of speakers will be checked to ensure compliance with the operational noise criteria.	Prior to Operation
T1	Traffic	The Stage 1 Construction Traffic and Pedestrian Management Plan would be updated finalised and implemented for Stage 2 works consistent with the document detailed in the EIS.	Prior to Construction
T2	Traffic	The findings of any road safety audits required for Stage 2 works would be implemented.	Prior to Construction
T3	Traffic	The Construction Traffic and Pedestrian Management Plan will contain a direction for all staff and contractors and all deliveries to access the site via Eight Mile Lane and Avenue Road.	Prior to Construction
T4	Traffic	Stock route signs would be installed along Avenue Road	Prior to construction
T5	Traffic	Staff will be required to access the site via Eight Mile Land and the Avenue (where this presents the most direct route to site) as part of their Work Health and Safety Requirements.	During Operations

T6	Traffic	<p>The Construction Traffic Plan is to include measures to mitigate impacts on stock movements including: Liaising with permit holders regularly to be informed in advance of intended stock movements.</p> <ul style="list-style-type: none"> - Notification to staff, sub-contractors and deliveries of stock movement time and location (this will be done through either email or text message notification depending on the amount of prior notice). - Education of site staff and sub-contractors of the stock movement protocols during site inductions . - Liaison with neighbours during times of flood to determine whether stock movements will be undertaken and management of construction traffic to accommodate these stock movements 	During Construction
T7	Traffic	<p>An operations traffic management plan would be developed and include measures to manage stock movements including:</p> <ul style="list-style-type: none"> - Liaising with permit holders to be informed in advance of intended stock movements. - Induction of staff to include stock movement education and recommendations for safe driving during these times. - Notification to staff either by text message or email of intended stock movement. If this is to occur during or close to a shift changeover time, staff are to be advised to allow additional travel time. - Notification to staff that during times of flood to expect stock movements. Notification to visitors that the NGCC is located on a stock movement route and that care and patience should be exercised when visiting the centre. - This information will be provided to visitors upon making an appointment for a visit. 	Prior to Operation
T8	Traffic	Sufficient Parking would be provided to meet operational needs with overflow parking provided.	Prior to Operation
T9	Traffic	Visitor information packages and the facility website would clearly show location of the correctional centre and nominated routes to the site.	Prior to Operation
T10	Traffic	The entry to the facility to be clearly signposted.	Prior to Operation

T11	Traffic	Directional signage to the centre will be provided from Eight Mile Lane.	Prior to Operation
WWTP1	Waste water treatment plant - General	The Project would Implement a risk assessment register in line with the <i>Draft Recycled Water Management Plan</i> (Appendix 3).	Prior to Operation
WWTP2	Waste water treatment plant - General	The Operational Management Plan would include measures for management of the WWTP as outlined in the <i>Draft Recycled Water Management Plan</i> (Appendix 3) technical paper	Prior to Operation
WWTP3	Waste water treatment plant - General	A Complaints register would be maintained and the site would act on complaints as soon as received.	During Operation
WWTP4	Waste water treatment plant - General	An appropriately sized Spill kit will be available in WWTP enclosure.	Prior to Operation
WWTP5	Waste water treatment plant - General	<p>The design and operation of WWTP elements would incorporate the following measures:</p> <ul style="list-style-type: none"> - Online continuous oxygen meter or regular manual testing of dissolved oxygen for anoxic / anaerobic tanks; - Online continuous oxygen meter for aerobic tank; - Automatic controller linked to PLC; - Daily visual inspections of all system components to ensure they are working effectively and excessive noise is not being generated. Ensure that pumps are working effectively and no blockages or pump failures have occurred. - Regular sludge depth measurements in first two years, frequency afterwards to be determined based on initial de-sludging rate. - Regularly review operational parameters (recycle, wasting rate, oxygen transfer) to ensure processes are occurring as required. - Preventative maintenance 	During detailed design
WWTP6	Waste water treatment plant - General	All staff contacting sewage to have appropriate training, PPE and vaccination shots. No public access.	During Operations

WWTP7	Waste water treatment plant - Recycled water	<p>The WWTP would utilise a triple barrier disinfection system, with redundant systems for essential plant elements and include the following:</p> <ul style="list-style-type: none"> - Implement initial validation and ongoing verification program. Emergency storage and wet weather storage for off-specification water. - Broad scale irrigation for irrigation of off-specification water intended for the dual reticulation system. - Water Management Control System in place to control water usage if required. 	Detailed design
WWTP8	Waste water treatment plant – Recycled water	<p>The WWTP would utilise the following for management of recycled water:</p> <ul style="list-style-type: none"> - Visual inspections of pond system would occur generally monthly and immediately before and after rainfall. - Include overflow points and drainage structures to ensure that overflows are unlikely to occur, that diversion structures are working correctly and that sufficient freeboard is available and erosion is not occurring. - Utilise irrigation scheduling to draw down the lagoon prior to forecast storm or wet periods, and following wet periods (soil moisture monitors to be utilised to avoid over watering) - Utilise licensed contractors to remove liquid in pond prior to any overflows occurring. - A pond management plan for algae control (and other components). - Preventative maintenance. 	During Operation
WWTP9	Hazardous materials	<p>The Project will implement a Hazardous Materials Management Plan to manage hazardous materials as part of the Wastewater treatment plant.</p>	Prior to Operation

WWTP10	Waste water treatment plant - Irrigation areas	<p>The WWTP would utilise the following for management of irrigation areas:</p> <ul style="list-style-type: none"> - Maintain MEDLI model (or similar) for irrigation areas, and calibrate against application rates and soil data to enable long term planning. - Utilise soil water monitors and irrigation controllers to ensure adequate but not excessive watering of soils. - Monthly visual inspections to be undertaken of supply infrastructure. - Monthly visual inspections of irrigation area infrastructure and runoff locations especially discharge points. - 6-monthly sampling of soils for signs of impacts from irrigation for first 2 years, annually thereafter. - No public or staff access to surface irrigation areas until sufficient withholding time (at least 4 hours) after irrigation. - Similar withholding time for livestock access. Preferably no access. If livestock are to access irrigation area, design system to withstand or avoid livestock damage, and WWTP to be specifically design to remove pathogens of concern for livestock (e.g. helminths and other parasites – note MBR / UV / chlorine disinfection should be sufficient) - Carry out preventative maintenance. 	During Operation
WWTP11	Water Reuse	<p>The following irrigation requirements would be adopted for the facility:</p> <ul style="list-style-type: none"> - A 14 ha irrigation area with a 45ML storage; and - an additional 28.5 ha reserve area to manage rare events 	During Operations
AM1	Amenity	The Project will prepare 1, 5 and 10 year post occupation reviews of the NGCC to determine economic impact of the facility on the local area as well as a review of crime and safety indices.	During Operations
V1	Visual impact	The Project would implement landscape buffer screening to the North of 50m, 30m to the South and 15m to the East as per the Stage 1 consent. Minor amendments to the Northern Boundary planting density may occur following consultation with directly impacted residents.	During Construction
V2	Visual impact	Additional planting and tree retention would occur towards the periphery of the site and away from the APZ.	During Construction
V3	Visual impact	Building materials and colours would be designed to be sympathetic to rural location.	During detailed design

L1	External lighting	External lighting would be designed to comply with Australian Standard, AS4282, "Control of the Obtrusive Effects of Outdoor Lighting"	During detailed design
L2	External lighting	Luminaires would be designed and controlled to minimise light spill.	During detailed design
AF1	Amenity - Farming Practices	The operations management plans for the site would include provision for maintenance in accordance with sound rural practices including: <ul style="list-style-type: none"> - Management of noxious weeds; - Pest management; Feral animal management. 	During Operations
ESD1	Ecologically Sustainable Development	<ul style="list-style-type: none"> - The following measures would be employed in detailed design to minimise consumption of resources, water and energy: - Water efficient fixtures, fittings and practices; - Energy and water efficient equipment; - Wastewater treatment and reuse on site; - Water Metering; - Naturally ventilated spaces; - Provision to accept site based renewable energy in the future; - Efficient building management systems and equipment, including lighting - Passive design elements such as building orientation, external shading, appropriate, use of thermal mass, performance glazing, thermal efficiency of building fabric; 	During detailed design
F1	Flood Management	The Operational Management Plan will include contingency measures for site access and management during times of flood. These plans and procedures would be tested annually.	During Operations
EC1	Economic Impacts	Prepare 1, 5 and 10 year post occupation reviews of the NGCC to determine economic impact of the facility on the local area as well as a review of crime and safety indices.	During Operations
EC2	Economic Impacts	The Project will participate in the Clarence Valley RoundTable during construction and develop: <ul style="list-style-type: none"> - Project Social pages to provide project updates. - Information for business to promote engagement directly of local suppliers. 	During Construction

BP1	Concrete Batching	The batch plant will be set up on hardstand and will contain dust mitigation measures such as filters for the silos, water sprays for aggregate stockpiles and a hardstand base.	Prior to Construction
BP2	Concrete Batching	Access and exit routes for heavy transport vehicles required to service the concrete batching facilities would be via Eight Mile Lane and The Avenue.	During Construction
BP3	Concrete Batching	Shut-off valves to avoid spillage during any stage of the operations would be employed	During Construction
BP4	Concrete Batching	Air filter systems would be employed along with best practice maintenance controls such as air tight connections and valve systems.	During Construction
BP5	Concrete Batching	Batch plant locations would be bunded and drained to detention ponds to collect flows and reduce the likelihood of runoff from site.	During Construction
BP6	Concrete Batching	Operations would be monitored to ensure no runoff from site occurs from activities	During Construction
BP7	Concrete Batching	Regularly maintain and inspect all runoff areas and ponds and repair or de-silt where necessary after severe rainfall to ensure they are in working order.	During Construction
BP8	Concrete Batching	Designated areas for plant and construction material storage and provide cut-off drains to ensure runoff from upstream areas is diverted around the site.	During Construction
BP9	Concrete Batching	Fuel / chemical areas to be bunded and prompt clean-up of spills.	During Construction
BP10	Concrete Batching	The batch plant would be regularly inspected and tested to ensure the emission levels do not deteriorate over the life of the project and levels at the nearest impacted do not exceed ICNG requirements.	During Construction
BP11	Concrete Batching	Minimise drop heights between conveyors.	During Construction
BP12	Concrete Batching	Bag fills in batch plants would not be filled to the top of the silos.	During Construction
BP13	Concrete Batching	Regularly maintain and service all operational plant and equipment to ensure optimum performance and reduce the potential for emissions.	During Construction

Table 7: Project Commitments

ID	ITEM	PROPOSED BENEFIT	TIMING
PC1	Construction impacts	The Project's Community Consultative Committee will monitor impacts of construction activities on local residents during construction	During Construction
PC2	Bus service	The Proponent will work with Transport for NSW regarding provision of a bus service to the correctional facility for visitors to inmates. Information will be provided to visitors to help them plan and manage their visits to the centre.	Prior to Operation
PC3	Employment during Construction	<p>The following activities and measures will be implemented in relation to employment during construction:</p> <ul style="list-style-type: none"> • Partner with TAFE NSW and employment providers to ensure courses for qualification and accreditations are widely known amongst potential job-seekers. • Develop a public construction calendar to provide information and advanced notice of skills and qualifications required and upcoming procurement packages. • Prioritise early information for local businesses of quantities of goods required (in order for businesses to pool resources or build consortiums). • Participate in the Clarence Valley Round Table to provide information regarding tenders, jobs and supplies required for construction. 	During Construction
PC4	Employment during Construction	Target 80% workforce from local area.	During Construction
	Aboriginal Participation	Develop a specific Aboriginal Participation in Construction Plan to achieve higher than 8% targets for Indigenous employment.	Prior to Construction
	Aboriginal Participation	Work with Indigenous representatives from the local TAFE and Community Colleges to design and prepare job descriptions and induction training manuals that outline the cultural significance of local Aboriginal communities as well as the Aboriginal significance of the site, for the construction of the correctional centre.	During Construction

ID	ITEM	PROPOSED BENEFIT	TIMING
		Regular Yarning Circles with local indigenous leaders will also discuss Aboriginal Participation targets and how the project is achieving and supporting these.	
	Accmodation impacts	Creation of a rental directory and liaison with existing accommodation providers to identify accommodation provisions for workers (should local employment targets not be met).	
	Community contributions	NorthernPathways will work with the nearby large infrastructure project teams, to coordinate community contribution projects. These could include community picnics, sporting events and open days, the Jacaranda Festival and concerts. The coordinated contributions will also assist in engaging with the community about the progress of the major infrastructure projects.	
PC7	Construction operations	The Project would investigate feasibility and interest from workforce and subcontractors on provision of bus services to site during key construction periods.	During Construction
PC8	Inmate Release	Work with local welfare and charitable services to establish appropriate case planning for inmates to ensure needs will be appropriately met upon release.	During Operation
PC9	Visitor support	Work with local welfare and charitable services to establish communications strategies to engage visitors to the correctional centre who may require support services when visiting the centre.	During Operation
PC10	Contribution to local area	Work with local welfare, charitable services and the Clarence Youth Action Group to identify contributions that can be made to the local area in relation to volunteer programs and youth activity programs.	During Operation
PC11	Provision of health services	Engage with Northern NSW Local Health Service to identify roles and responsibilities for inmate emergency care procedures.	Prior to Operation
PC12	Sharing health resources	Liaise with Northern NSW Local Health Service regarding potential part time employment (job-share) opportunities for medically trained staff that will be	During Operation

ID	ITEM	PROPOSED BENEFIT	TIMING
		employed at the correctional centre.	
PC13	Inmate release	Continue to engage with the Grafton Community Corrections Office to develop strategies for probation and parole services.	Prior to Operation
PC14	Security management	Continue to liaise with Grafton Police to develop strategies for incident management and inmate transport.	Prior to Operation
PC15	Contribution to local area	Northern Pathways will join Grafton Chamber of Commerce (as corporate member).	During Construction and During Operation
PC16	Aboriginal Participation	Develop a plan that implements the operator's Reconciliation Action Plan and meets the 8% Indigenous employment target	Prior to Operation
PC17	Aboriginal Participation	Work with Indigenous groups to monitor and update Inmate Rehabilitation and Reintegration Programs	During Operation
	Aboriginal Participation	<p>Develop a program for the provision of inmate art through the engagement with Clarence Valley Council's Cultural Committee and regional art galleries.</p> <p>Continue liaison with local Aboriginal leaders and groups through Yarning Circles to ensure ongoing input to the design and implementation of culturally appropriate programs within the facility promoting culture, art, language and country.</p>	During Operation
	Aboriginal Participation	Work with Indigenous representatives from the local TAFE and Community Colleges to design and prepare job descriptions and induction training manuals that outline the cultural significance of local Aboriginal communities as well as the Aboriginal significance of the site, for the operation of the correctional centre.	Prior to Operation



APPENDICES



Appendix 1 Phase Two EIS Exhibition Period Engagement – Outcomes Report



Appendix 2 Swept Paths



Appendix 3 Amended Recycled Water Management Plan



Appendix 4 Recycled Wastewater Management Drawings



Appendix 5 Additional Soils Investigations



Appendix 6 Updated Aboriginal Cultural Heritage Management Plan



Appendix 7 Updated Infrastructure Management Plan