

Modification of Infrastructure Approval

Section 5.25 of the *Environmental Planning & Assessment Act 1979*

As delegate of the Minister for Planning and Public Spaces, I approve the modification of the State significant infrastructure approval referred to in Schedule 1, subject to the conditions in Schedule 2.



Glenn Snow
Director
Transport and Water Assessments

Sydney

20 August 2024

SCHEDULE 1

Infrastructure Approval:

SSI-8896 granted by the Minister for Planning and Public Spaces on 23 July 2021

For the following:

Construction and operation of a drought response desalination plant producing up to 30ML/day including: seawater intake infrastructure; desalination units; brine discharge via existing ocean outfall; electricity/water supply; ancillary works.

Modification:

The modification would convert the desalination plant from a drought response desalination plant to being permanently available for water supply. Changes to the plant and construction methodology would include: plant design changes (within the existing approved project footprint), relocation of the approved Direct Ocean Intake system, Direct Ocean Intake construction methodology changes including the use of a Jack Up Barge, daily use of a helicopter to transport construction staff to the Jack Up Barge, changes to allow 24-hour work over a 9–12-month period, increase in project duration from 12 months to 36 months, and increase in heavy and light vehicle movements.

Note:

Words/numbers that have been deleted are shown as: ~~deleted~~

Words/numbers that have been added are shown as added

SCHEDULE 1

1. Amend Description of State Significant Infrastructure as follows:

Construction and operation of a ~~drought response~~ desalination plant producing up to 30ML/day including: seawater intake infrastructure; desalination units; brine discharge via existing ocean outfall; electricity/water supply; ancillary works.

2. Amend Definitions as follows:

<u>Highly noise intensive work</u>	<u>Work identified as particularly annoying in section 4.5 of the Interim Construction Noise Guideline (DECC, 2009)</u>
<u>Modification Report</u>	<u>Environment Impact Statement – Modification 1: Belmont Permanent Desalination Plant, Document no: A411110 BelmontDesal Mod Report 20240116 Final Version: V005, 16 January 2024, and Appendices A to H of the Modification Report.</u>
<u>Response to Request for Information #1</u>	<u>Environment Impact Statement – Modification 1: Belmont Permanent Desalination Plant – Submissions Report RFI1 Response, Document no: IA411110 BelmontDesal RFI1 V003 R001, Version: V003, 30 May 2024, and Appendix A.</u>
<u>Response to Request for Information #2</u>	<u>Environment Impact Statement – Modification 1: Belmont Permanent Desalination Plant –RFI#2 Response, Document no: IA411110 BelmontDesal RFI2 V003 R001, Version: V003, 19 June 2024, and Appendices A to D.</u>
<u>Response to Request for Information #2 Addendum</u>	<u>Environment Impact Statement – Modification 1: Belmont Permanent Desalination Plant – RFI#2 Addendum EPA Review letter 240701 Response, Version: V001, 29 July 2024, and Appendix 1.</u>
<u>Submissions Report</u>	<u>Environment Impact Statement – Modification 1: Belmont Permanent Desalination Plant - Submissions Report, Document no: A411110 BelmontDesal Sub Report V005 R001, Version: V005, 13 May 2024, and Appendices A to F.</u>

SCHEDULE 2

1. Amend Schedule 2, Part A – Administrative Conditions, Condition A2 as follows:

A2. The development may only be carried out:

- (a) in compliance with the conditions of this approval;
- (b) in accordance with all written directions of the Planning Secretary;

- (c) in accordance with the EIS, Amendment Report, Response to Submissions and additional information provided in support of the application during the assessment period;
- (d) in accordance with the management and mitigation measures in Appendix 2.
- (e) **in accordance with the Modification Report, Submissions Report, Response to Request for Information #1, Response to Request for Information #2, Response to Request for Information #2 Addendum.**

2. Amend Schedule 2, Part A – Administrative Conditions, Condition A3 as follows:

A3. Consistent with the requirements in this approval, the Planning Secretary may make written directions to the Proponent in relation to:

- (a) the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this approval, including those that are required to be, and have been, approved by the Planning Secretary; and
- (b) the implementation of any actions or measures contained in any such document referred to in condition A3(a).

The conditions of this approval and directions of the Planning Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document listed in condition A2~~(e)~~. In the event of an inconsistency, ambiguity or conflict between any of the documents listed in condition A2~~(e)~~, the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.

Note: For the purposes of this condition, there will be an inconsistency between documents if it is not possible to comply with both documents, or in the case of a condition of approval or direction of the Planning Secretary, and a document, if it is not possible to comply with both the condition or direction, and the document.

3. Amend Schedule 2, Part B – Community Information and Reporting, Condition B2 as follows:

B2. No later than one month before the commencement of construction, a Community Communication Strategy must be prepared and submitted to the Planning Secretary for approval. The Community Communication Strategy is to provide mechanisms to facilitate communication between the Proponent, the Council and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the design and construction of the development. The Community Communication Strategy must:

- (a) assign a central contact person to keep the nearby sensitive receivers regularly informed throughout the development;
- (b) detail the mechanisms for regularly consulting with the local community throughout the development, such as holding regular meetings to inform the community of the progress of the development and report on environmental monitoring results;
- (c) detail a procedure for consulting with nearby sensitive receivers to schedule high noise generating works, vibration intensive activities or manage traffic disruptions;
- (d) include contact details for key community groups, relevant regulatory authorities, Registered Aboriginal Parties and other interested stakeholders; and
- (e) include a complaints procedure for recording, responding to and managing complaints, including:

- (i) email, toll-free telephone number and postal addresses for receiving complaints;
 - (ii) advertising the contact details for complaints before and during operation, via the local newspaper and through on-site signage;
 - (iii) a complaints register to record the date, time and nature of the complaint, details of the complainant and any actions taken to address the complaint; and
 - (iv) procedures for the resolution of any disputes that may arise during the course of the development;
- (f) **detail the measures for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by Condition 0 including:**
- (i) **justification and description of the potential work, location and duration of the out-of-hours work;**
 - (ii) **the noise characteristics and likely noise levels of the construction / activity(ies) being undertaken;**
 - (iii) **mitigation and management measures which aim to achieve the relevant NMLs and vibration criteria under Conditions Error! Reference source not found. and Error! Reference source not found. (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers); and**
 - (iv) **respite periods.**

4. Amend Schedule 2, Part B – Community Information and Reporting, Condition B9 as follows:

B9. Before the commencement of construction, the Proponent must establish an engagement arrangement with NSW Health. The purpose of the engagement is to consult with NSW **Health** throughout the life of the proposal, with consultation commencing prior to the commencement of construction and continuing for the duration of operation and for at least six months following the completion of mothballing and/or decommissioning. The engagement arrangement may cease at any time, subject to the agreement of both the Proponent and NSW Health.

5. Amend Schedule 2, Part C – Construction Environmental Management, Condition C1 as follows:

C1. Prior to the commencement of construction **of each project phase**, the Proponent must submit certified drawings **that relate to that phase** to the Planning Secretary that have been prepared and signed by a suitably qualified practising **Structural** Engineer and that demonstrate compliance with the conditions of this approval.

Note:

- *The conditions of this approval include the requirement that the development must be carried out in accordance with the documentation specified at Condition A2(c)(e).*

6. Amend Schedule 2, Part C – Construction Environmental Management, Condition C2 as follows:

C2. The Proponent must ensure the development includes **a wind break fence or similar on the western side of the proposed development disturbance area adjacent to Ocean Park Road to prevent sand blowing across the road into adjacent wetlands prior to the commencement of construction.** ~~bund planted with native~~

~~vegetation on the western side of the proposed development, adjacent to Ocean Park Road and the bund is established prior to the commencement of operation. Details of the bund must be shown in the certified drawings specified in Condition 0~~

7. Amend Schedule 2, Part C – Construction Environmental Management, Condition C6 as follows:

- C6. Prior to the commencement of construction, the Proponent must submit a pre-commencement dilapidation report to Council and relevant property owners along Beach Street and Ocean Park Road. The report must provide an accurate record of the existing condition of adjoining private properties, and Council assets that are likely to be impacted by the proposed works.

8. Amend Schedule 2, Part C – Construction Environmental Management, Condition C14 as follows:

- C14. The Proponent must prepare a Biodiversity Management Sub-Plan (BMSPP) that must address, but not be limited to, the following:
- (a) a native vegetation management plan for the land west of Ocean Park Road (as shown at **Appendix 3**). This should include:
 - (i) details of weed monitoring and (if required, removal),
 - (ii) management of potential groundwater drawdown impacts and how these will be monitored and managed;
 - (iii) a plan to minimise weed invasion as a result of hydrological changes;
 - (b) a detailed Chytrid fungus management plan that includes procedures to minimise and monitor the spread of the fungus;
 - (c) a monitoring and management plan for the **bund fence (or similar)** required under Condition 0. The monitoring and management of the fence (or similar) bund is to occur for a period of three years from the establishment of the fence (or similar) to monitor and manage ~~This should include wind fencing to prevent~~ sand blowing on the road and into the adjacent wetland area;
 - (d) detail of the installation of measures to be implemented on the western side of Ocean Park road to prevent access and damage to vegetation. ~~permanent temporary post and cable fencing on the western side of Ocean Park Road of the area of impact shown at Appendix 3, to restrict access and damage to native vegetation~~

9. Amend Schedule 2, Part C – Construction Environmental Management, Condition C18 as follows:

- C18. The Construction Traffic and Pedestrian Management Sub-Plan (CTPMSP) must be prepared to achieve the objective of ensuring safety and efficiency of the road network and address, but not be limited to, the following:
- (a) be prepared by a suitably qualified and experienced person(s);
 - (b) be prepared in consultation with Council and TfNSW;
 - (c) detail the measures that are to be implemented to ensure road safety and network efficiency during construction in consideration of potential impacts on general traffic, cyclists and pedestrians and bus services; and
 - (d) detail heavy vehicle routes, access and parking arrangements that must include sufficient parking facilities on-site to ensure that construction traffic associated

with the development does not utilise public and residential streets or public parking facilities.

- (e) A Driver Code of Conduct must be prepared and communicated by the Proponent to heavy vehicle drivers and must address the following:
 - (i) minimise the impacts of earthworks and construction on the local and regional road network;
 - (ii) minimise conflicts with other road users;
 - (iii) minimise road traffic noise; and
 - (iv) ensure truck drivers use specified routes.
- (f) **include details of the traffic control arrangements to manage the separation of pedestrian and bicycles from vehicles at the intersection of Ocean Park Road and Green Street and any other location they are required.**

10. Amend Schedule 2, Part C – Construction Environmental Management, Condition C26 as follows:

C26. Evidence of the retirement of credits or payment to the Biodiversity

Conservation Fund in satisfaction of Condition Error! Reference source not found. must be provided to the Planning Secretary prior to carrying out development that will impact on biodiversity values.

A PCT as specified below	Number of Credits	In the below IBRA subregions
772 – Coastal foredune wattle scrub	1	Wyong, Hunter, Pittwater and Yengo. or Any IBRA subregion that is within 100 kilometres of the outer edge of the impacted site.
1071 – <i>Phragmites australis</i> and <i>Typha orientalis</i> coastal freshwater wetlands of the Sydney Basin Bioregion	4 (Deleted)	Wyong, Hunter, Pittwater and Yengo. -or Any IBRA subregion that is within 100 kilometres of the outer edge of the impacted site.
783 – Coastal freshwater swamps of the Sydney Basin Bioregion	1 (Deleted)	Wyong, Hunter, Pittwater and Yengo. -or Any IBRA subregion that is within 100 kilometres of the outer edge of the impacted site.

Note: The Department supports the retirement of this credit from a location as close to the project as possible.

11. Amend Schedule 2, Part C – Construction Environmental Management, Condition C29 as follows:

OUT-OF-HOURS WORK PROTOCOL – WORKS NOT SUBJECT TO AN EPL

C29. Prior to the commencement of construction an Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of construction which is outside the hours defined in Condition Error!

Reference source not found.. The Protocol must be prepared in consultation with the ER, and must provide:

- (a) justification for why these Construction activities need to be undertaken;
- (b) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where:
 - (i) the ER review all proposed out-of-hours activities and confirm their risk levels,
 - (ii) low risk activities can be approved by the ER, and
 - (iii) high risk activities that are approved by the Planning Secretary.The risk assessment(s) must be based on a risk assessment carried out in accordance with AS/NZS ISO 31000:2018 "Risk Management";
- (c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria;
- (d) a process for selecting and implementing mitigation measures for residual impacts in consultation with impacted sensitive receivers at each affected location. The measures must take into account the predicted noise levels (based off worst case work scenarios and where mitigation measures will be implemented) and the likely frequency and duration of the out-of-hours works that sensitive receivers would be exposed to, including the number of noise awakening events;
- (e) details of respite periods consistent with the requirements developed in consultation with impacted sensitive receivers;
- (f) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and
- (g) notification arrangements in accordance with Condition (f) and notification to the Planning Secretary of approved low risk out-of-hours works.

The Protocol must be submitted to and approved by the Planning Secretary before the commencement of out-of-hours work. The approved Protocol must be implemented for the duration of Construction. The Planning Secretary may revoke the Out-of-Hours Work approval subject to ongoing community complaints.

The Protocol does not apply if the requirements of Condition 0(a) or (b) or (d) are met, or if the Construction activity(ies) is subject to an EPL or if a negotiated agreement is made with the impacted sensitive receivers.

Notes:

- If Construction is regulated by the EPA via an EPL, the management of the activity or Construction must not be co-regulated under the Protocol. The Protocol process must only be used if the Construction activity is not covered by an EPL, including in circumstances where the activity or Construction did not commence under an EPL.
- If the Construction activity(ies) is subject to an EPL and the EPA does not endorse extended hours as part of the EPL, the extended hours cannot be considered under this Protocol.
- Any Planning Secretary approval for Out-of-Hours Work may be subject to trial requirements.
- The intent of the protocol is to provide an assessment framework for short term intermittent activities undertaken out of hours. These activities should be consistent

with those identified in the documents listed in Condition A2. Any long term out-of-hours-work not assessed in the documents listed in Condition A2 may need a future Modification approval. The use of the terms short / long term should be considered on a case by case basis and be relative to the duration of construction of the SSL.

12. Amend Schedule 2, Part D – During Construction, Condition D4 as follows:

VARIATION TO CONSTRUCTION HOURS

~~D4. Notwithstanding condition D3, provided noise levels do not exceed the existing background noise level plus 5dB, works may also be undertaken during the following hours:~~

~~(a) between 6pm and 7pm, Mondays to Fridays inclusive; and~~

~~(b) between 1pm and 4pm, Saturdays.~~

Notwithstanding Conditions Error! Reference source not found. and Error! Reference source not found. Error! Reference source not found. Construction may be undertaken outside the hours specified in the following circumstances (a, b, c or d below):

(a) Safety and Emergencies, including:

- (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or
- (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm.

On becoming aware of the need for emergency work in accordance with Condition 0(a)(ii), the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. Best endeavours must be used to notify all noise and/or vibration affected residents and owners/occupiers of properties identified sensitive receivers of the likely impact and duration of those Construction activity(ies).

If an activity is scheduled to take a long period to be completed, this activity should be commenced as early as possible and aim to be started and completed within the Construction hours identified in Condition Error! Reference source not found.. Poor programming should not form part of the rational to undertake safety and emergencies under Condition 0(a)(ii). It is essential to prioritise timely completion of activities to ensure the safety and well-being of workers and anyone else who may be affected by the construction activities.

(b) Construction that meets the following criteria, including:

- (i) Construction that causes $L_{Aeq(15\text{ minute})}$ noise levels:
 - no more than 5 dB(A) above the rating background level at any residence in accordance with the *Interim Construction Noise Guideline* (DECC, 2009), and
 - no more than the 'Noise affected' NMLs specified in Table 3 of the *Interim Construction Noise Guideline* (DECC, 2009) at other sensitive receivers; and
- (ii) Construction that causes L_{AFmax} noise levels no greater than 15 dB(A) above the night period rating background level at any residence during the night period as defined in the *Interim Construction Noise Guideline* (DECC, 2009); and
- (iii) Construction that causes:

- continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of *Assessing Vibration: a technical guideline* (DEC, 2006), and
- intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of *Assessing Vibration: a technical guideline* (DEC, 2006).

(c) **By Approval, including:**

- (i) where different hours are permitted or required under an EPL in force in respect of the SSI; or
- (ii) Construction which is not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition 0; or
- (iii) negotiated agreement with the substantial majority of affected residents and sensitive receivers for Construction which is not subject to an EPL.

Note: Refer to Error! Reference source not found. of this approval for guidance regarding negotiated agreements.

(d) **By Activity, including:**

- (i) MicroTBM activities at site can occur 24 hours a day, seven days a week. This does not permit material deliveries associated with MicroTBM activities.
- (ii) Helicopter movements in accordance with Condition D39.
- (iii) Offshore works at the jack-up barge from 5:00am to 8:00pm seven days per week.

Note: Although certain activities identified in Condition 0(d) are permitted to occur outside the construction hours defined in Condition Error! Reference source not found., these activities still need to be managed in accordance within the environmental management framework established within this approval.

13. Amend Schedule 2, Part D – During Construction, Condition D5 as follows:

D5. ~~DELETED Construction activities may be undertaken outside of the hours in condition D3 and D4 if required:~~

- ~~(a) by the Police or a public authority for the delivery of vehicles, plant or materials; or~~
- ~~(b) in an emergency to avoid the loss of life, damage to property or to prevent environmental harm; or~~
- ~~(c) where the works are inaudible at the nearest sensitive receivers; or~~
- ~~(d) where a variation is approved in advance in writing by the Planning Secretary or his nominee if appropriate justification is provided for the works.~~

14. Amend Schedule 2, Part D – During Construction, Condition D6 as follows:

D6. ~~DELETED Notification of such construction activities as referenced in condition D5 must be given to affected residents before undertaking the activities or as soon as is practical afterwards.~~

15. Amend Schedule 2, Part D – During Construction, Condition D7 as follows:

D7. ~~Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:~~

- ~~(a) 9am to 12pm, Monday to Friday;~~
- ~~(b) 2pm to 5pm Monday to Friday; and~~
- ~~(c) 9am to 12pm, Saturday.~~

Except as permitted by an EPL, highly noise intensive works that result in an exceedance of the noise affected NML at the same receiver must only be undertaken:

- (a) between the hours of 8:00 am to 6:00 pm Monday to Friday;
- (b) between the hours of 8:00 am to 1:00 pm Saturday; and
- (c) if continuously (any period during which there is less than one hour between ceasing and recommencing any highly noise intensive work), then not exceeding three (3) hours), with a minimum cessation of highly noise intensive work of not less than one hour.

Notes:

- 1. As a guide, Work should be carried out in continuous blocks that do not exceed three hours each with a minimum respite period of one hour between each block.
- 2. Noise affected NML is defined as RBL + 10 dB as defined in the ICNG.

16. Amend Schedule 2, Part D – During Construction, Condition D13 as follows:

D13. ~~DELETED The Proponent must ensure construction vehicles (including concrete agitator trucks) do not arrive at the site outside of the construction hours of work outlined under condition D3.~~

17. Amend Schedule 2, Part D – During Construction, Condition D24 as follows:

D24. Within three months of the commencement of construction, the Proponent must design an operational stormwater management system for the development. The system must:

- (a) be designed by a suitably qualified and experienced person(s);
- (b) be generally in accordance with the conceptual design in the documentation specified in Condition A2(c)~~(e)~~;
- (c) be in accordance with applicable Australian Standards; and
- (d) ensure that the system capacity has been designed in accordance with *Australian Rainfall and Runoff* (Engineers Australia, 2016) and *Managing Urban Stormwater: Council Handbook* (EPA, 1997) guidelines.

18. Amend Schedule 2, Part D – During Construction, Condition D41 as follows:

HELICOPTER USE

D41. Helicopter operations associated with the project (inclusive of ground engine runs, starting and taxiing and flight) can only occur from 6am to 7pm, seven days per week.

Note: This Condition does not prohibit any flights required for emergency purposes.

19. Amend Schedule 2, Part D – During Construction, Condition D42 as follows:

D42. The helicopter operator and Project must record the times and durations of all aircraft operations associated with the project and make them available for inspection when requested by the Planning Secretary.

20. Amend Schedule 2, Part E – Operational Environmental Management, Condition E25 as follows:

ENERGY CONSUMPTION AND GREENHOUSE GAS

E25. The Proponent shall ensure that the desalination plant is powered by 100% renewable energy.

Note: this approval does not permit the installation of any sources of renewable power on site.

21. Amend Schedule 2, Part E – Operational Environmental Management, Condition E26 as follows:

E26. The Proponent is to record the sources of power used at the desalination plant and make these publicly available on the Proponent’s website every six months.

22. Amend Schedule 2, Part E – Operational Environmental Management, Condition E27 as follows:

E27. The Proponent must keep records of the energy consumption of the plant and the source of the energy consumed. The Proponent must make these records available to the Planning Secretary upon request.

23. Amend Schedule 2, Appendix 2 – MANAGEMENT AND MITIGATION MEASURES as follows:

~~Table.~~

Refer to Table B-1 of Request for Information #2, unless modified by conditions of this approval.

24. Amend Schedule 2, Appendix 4 – Community consultation and Agreement as follows:

The below is guidance material on how to engage and record community agreements and is based off EPA model licence conditions (E1.2 and E1.3) and EPA guidance material for EPL applications. The intent is to provide guidance on how the Proponent can engage and obtain community agreements to undertake out-of-hours-works. This guidance should be read in conjunction with Condition (c)(iii) (Variation to Work Hours) and Condition (iii) (Out-of-Hours Work Protocol).

Requirements for community consultation and agreement

1. **Any negotiated agreements with affected residents and sensitive receivers for out-of-hours-work must:**
 - a. **include consultation of impacted residents and sensitive receivers. This includes sensitive receivers that have declined to participate in previous agreements unless a community member has explicitly requested not to be involved in any future consultation about future out-of-hours-work;**
 - b. **include the following information:**

- i. description and justification of the Construction activity(ies) proposed;
 - ii. any expected impacts in clear plain English based on noise modelling;
 - iii. the expected duration of the Construction activity(ies);
 - iv. respite periods;
 - v. any expected benefits for receivers;
 - vi. any other known concurrent out-of-hours-work that will be occurring; and
 - vii. any other out-of-hours-work that will be occurring on the nights preceding and following the proposed works or, if the proposed work precedes or follows a weekend period, any other out-of-hours-work that will be occurring on the weekend;
- c. request consent from the residents and sensitive receivers for their responses to be provided to the Planning Secretary and ER;
 - d. ensure that a record is kept when contact cannot be made with residents and sensitive receivers after three attempts, including leaving "sorry I missed you" cards explaining the reason for the visit and requesting a return phone call; and
 - e. for longer term community agreements (those predicted to go on longer than 28 calendar days), re-engage the impacted community to ensure consent is maintained and continuing.

Detailed records of all community consultations, including attempts to contact impacted residents and sensitive receivers, must be maintained for the duration of Construction by the Proponent.

Any residents and sensitive receivers who requests a copy of the record of conversations must be supplied with one.

- 2. The outcomes of the community consultation and agreement process must be documented and include:
 - a. the script used during the community consultation;
 - b. community response and consent rates (including where no contact could be made) based on:
 - i. impacted sensitive receivers;
 - ii. location of the proposed construction activity(ies) to the sensitive receivers;
 - iii. duration and potential impacts to be experienced; and
 - iv. proposed mitigation and management measures to be implemented.