

Council Reference: **69731E**
Contact Person: **Lachlan Jones**1st November 2022

NSW Department of Planning and Environment

Dear Sir/Madam,

SSD 35999468 - Shoalhaven Hospital Redevelopment
Lot 104 DP 1165533, Lot 7034 DP 1031852 & Lot 373 DP 755952
Shoalhaven St, NOWRA

Shoalhaven City Council welcomes the opportunity to provide comment on the Shoalhaven Hospital Redevelopment (SSD 35999468). Council strongly supports the proposed expansion of the Shoalhaven District Memorial Hospital which will create a state-of-the-art health facility, helping to ensure that our communities have access to a range of health services needed now and into the future.

Please find below technical comments from Council on the Request for Advice in relation to the submitted Environmental Impact Statement (EIS) for the proposed development.

1. Strategic Planning Comments/Requirements:

Parking

- This has been a key ongoing issue of concern to Council in regard to the hospital as it has continued to evolve in its current location. Council has consistently requested the provision of 'free' parking associated with the hospital and in this regard most recently resolved to request the NSW Government to at least remove all impediments to the provision of "no-charge parking" for nurses in particular, and other hospital employees in general, as a matter of urgency. As such in this context, this proposal/application needs to consider and provide appropriate free parking for employees and visitors alike. This is critical for the functioning of the new hospital and to ensure that it does not have a further negative impact on the amenity of the adjoining precincts. This is perhaps one of the key issues that the application needs to address and be clear on.

Clinical services

- Council considers it essential that an appropriate range of clinical services is provided through the hospital redevelopment to cater for the current and future populations of Shoalhaven. Some of the key clinical service considerations are touched on in the Council resolution of 25 May 2021.

Traffic Management

- Given the location of the existing hospital and the proposed redevelopment of the area generally, it is critical that traffic impact and management/mitigation are appropriately considered so as not to unduly impact on adjoining precincts and recognising relevant other land uses (e.g. schools). The traffic management considerations associated with

the hospital also need to consider integration with other significant projects in the broader surrounding area, including specifically the Nowra Riverfront Precinct, which is another State Significant Precinct recognised in the Regional Plan. In this regard it is critical that there are a range of transport options to access the redeveloped hospital that also focus on active and public transport so as to limit where possible excessive car use/access – the provision of regular upfront bus services that link the hospital and adjoining key precincts (Riverfront Precinct) to the Nowra CBD, Bomaderry Railway Station and the broader Shoalhaven is considered essential. This is something that the NSW Government need to commit to and work on with Council and others.

Retention of vegetation and management of remnant park

- It is important that the existing remnant vegetation that is located within the area at the southern end of the subject site that is shown in the Zonal Master Plan is retained in the long term and also reinforced in an appropriate manner. This includes the significant blackbutt tree that is located in this area. The proposed design needs to take advantage of this retained space integrate the open space and hospital.
- Some early discussions were held with Council regarding the future management of the retained park area. Further clarification and discussions are required in this regard as the project advances. It is also important that existing street trees along Shoalhaven Street are retained and replaced/augmented where needed.

Design and neighbourhood amenity

- Given the prominent location of this site it is important that the development is designed and built to a high standard that also considers (and mitigates where possible) its potential impact on the amenity of the adjoining residential neighbourhoods. This includes height, bulk, scale, façade design etc.

Other impacts

- In early discussions with Health Infrastructure, it was flagged that there are existing water mains and other infrastructure that may be impacted by the redevelopment works. As such it is important that Council's Shoalhaven Water is fully engaged, as well as Council's City Services if it is proposed (for example) to relocate existing infrastructure into the Shoalhaven Street road reserve.

Future Zoning

- This is now being separately handled by NSW Department of Planning and Environment via a proposed amendment to Shoalhaven Local Environmental Plan 2014.
- It is noted that Council has been provided with the opportunity to comment on the Explanation of Intended Effects (EIE) for the proposed State Environmental Planning Policy (SEPP – Shoalhaven Hospital).
- Council has provided a separate submission on the EIE for the proposed SEPP.

2. Development Engineer Comments/Requirements:

Bush Fire Protection:

- No specific access requirements. Evacuation is to be addressed in a future Bush Fire Evacuation Report.
- The Bushfire Protection Assessment Report by Eco Logical Australia Pty Ltd proposes the Asset Protection Zones (APZs) required to the north and west of the existing and proposed hospital development. The applicant should ensure that these APZs are not located within the hazard side of the road reserve. Any APZ should commence from the kerb on the outer side of the road.

Earthworks:

- The concept bulk earthworks plans show a cut volume of 17,734m³ and fill volume of 3,403m³. This results in a significant excess of 14,331m³, which is not seen as a design that responds to the natural landform and topography.
- Quite a lot of the cut proposed is within an existing rock layer which would require extensive mechanical means of removal such as rock breaking/hammering/sawing. This is likely to cause great impact on adjacent residents who would need to deal with the noise and vibration impacts associated with these works. Ideally, the amount of cut within rock should be minimised.
- Batters of 1(V):2(H) are proposed on the engineering plans. The steepness of these batters is typically not desirable as they can be prone to erosion and stability issues as well as being difficult to maintain. These batters should be mass planted, mulched and protected with a material such as geofabric.
- Some of the above batters will also be within the rock layer which would likely result in a poor amenity outcome. The applicant should address how these areas will be embellished.
- A batter close to vertical is proposed on Section 02. Further information cannot be found on this batter and how the land behind the batter will be adequately retained.
- The OSD proposed directly adjacent to the road reserve on Shoalhaven Street may result in de-stabilisation of the road reserve.

Stormwater:

- An on-site detention tank has been proposed as part of the works to ensure that post-development peak flowrates are no worse than pre-development. However, the applicant has not modelled the required storm events as per Shoalhaven Development Control Plan 2014 (SDCP 2014). Given this is unlikely to increase the size of the tank, it is considered acceptable to condition this is checked as part of the detailed stormwater design.
- The applicant proposes a dispersion trench within the south-east corner of the site to re-direct stormwater away from the site from the undeveloped land. Conditions will be imposed to ensure there is adequate infiltration on site for the design and otherwise will be required to be re-directed towards the existing or proposed stormwater infrastructure.

- The existing stormwater pipe proposed to connect in with on Shoalhaven Street is only 450mm in diameter which indicates that the 600mm stormwater line from the site will put the line over capacity. Additionally, Council does not allow the connection of a larger pipe to a downstream smaller pipe due to blockage potential. Conditions will be applied for the applicant to undertake a capacity check and upsizing of downstream infrastructure.
- The existing Council stormwater infrastructure within the south-east corner of the site within the easement is unaffected by the proposal.

Traffic / Parking

- Please refer to Council's Principal Transport Engineer detailed comments later in this submission in response to the submitted Transport and Accessibility Impact Assessment.
- It is important to note that the project control group which was created to assist with the preparation of this assessment report was not adequately consulted and were not given the opportunity to provide feedback in response to the findings outlined in the report. This is disappointing, given Council and Transport for NSW allocated a number of staffing resources towards this work in the hope of achieving some mutually agreeable outcomes.
- Council has made several resolutions in relation to the parking and traffic impacts associated with the hospital. Concerns remain that the proposal will not provide adequate measures to address the reliance on on-street parking for staff, patients and visitors associated with the hospital and with the expansion is likely to increase this reliance. The multi-story carpark previously constructed is underutilised as it is a paid parking arrangement and therefore has done little to address the impacts on the surrounding local roads. Chapter G21, SDCP 2014 clearly requires a development to provide parking facilities on-site and not rely on on-street parking. This is at odds with the Transport and Accessibility Impact Assessment, which assumes that parking within the local streets is available for the use of the hospital. It is therefore Council's position that the majority of the parking required for the hospital should be provided onsite, be free (at least for staff) and where this cannot be met, provide measures within the local roads such as pedestrian lighting, footpaths, etc. to provide a safe and convenient path of travel for hospital staff and visitors.
- Further, a review of the plans has identified the following issues.
 - Turning circles to be provided for semi-trailer vehicles accessing the loading dock are non-complaint. They demonstrate that there is conflict with the sliding gate and the tree proposed to be retained. These need to be revised and confirmed by the Traffic Consultant.
 - The heavy vehicles leaving the loading dock will be exiting at the same point as the ambulances. This is not ideal particularly during emergency response.
 - The visual impact to Shoalhaven Street and the existing residences due to the loading dock is significant and needs to be addressed. Perhaps there is potential to screen this area with landscaping

- The proposed lane for passenger pick up/drop off is not considered appropriate as passing parked vehicles is not possible. The access on to the internal road is also too close to the public road and may cause conflict and be potentially dangerous.
- The use of decomposed granite within the site for footpaths is not considered appropriate nor a long-term solution. This would likely scour out and create issues for users with mobility issues, cause trip hazards.
- A concrete footpath would be required to be installed along the entire frontage of the development and connect to existing pedestrian pathways. As currently shown, they are not continuous.
- A pedestrian refuge should be incorporated at the main entry driveway on North Street due to the driveway width proposed.

Other:

- There appears to be an opportunity to install some additional seating (i.e. standalone or incorporated into landscaping) around the landscaped area surrounding the large blackbutt tree for the use of the public and staff for use during lunchbreaks.
- Given the amount of outstanding issues and the incomplete consultation conducted as part of the Transport and Accessibility Impact Assessment, Council is not satisfied with providing engineering conditions at this stage as it is believed that many issues remain outstanding and unresolved.

3. Transport Engineer Comments/Requirements:

- The key transport issues recommended to be discussed further with Council and Transport for NSW and to be addressed with the application can be summarised as:
 - Impact on Parking. Council disagrees with many of the statements in the Transport and Accessibility Impact Assessment and its conclusion; and is very concerned about the current parking and safety problems and how this will be exacerbated by the proposal.
 - Impact on Amenity. This relates to the current parking and safety problems (how the hospital impacts the surrounding neighbourhood) and how this will be exacerbated by the proposal.
 - There is concern there is no commitment to resolving the parking problems onsite, nor is there any commitment to mitigating the impacts of parking sprawl in the surrounding neighbourhood (i.e. inadequate infrastructure, vehicle damage to verges, lack of kerb and guttering, paths and lighting etc.).
 - There is concern the Transport and Accessibility Impact Assessment identifies a strategy of quantum shift to alternative transport modes (i.e. to public and active transport) and there is a commitment to provide 90 bike racks onsite, yet no commitment to improve any of the active transport linkages to the hospital from the surrounding area.

Council would expect that the application incorporates solutions to address these issues.

- The following recommendations are made to address transport impacts:

- Increase the existing multi-storey carpark by 2-storeys (4 levels), to create an additional 130 spaces.
- Build an additional new multi-storey carpark (5.5 storeys, or 11 levels), to create an additional 358 spaces (i.e. construct between the existing multi-storey carpark site and the proposed development, including pedestrian linkages between both carparks and the proposed new building).
- Make both multi-storey carparks “free parking”. Only this will ensure higher utilisation.
- A balance of 2-hour parking and all-day parking can be employed in both facilities to ensure responsible and practical utilisation of the multi-storey car parking facilities. This is essential to minimise the parking impacts on-street.
- Construct kerb and guttering in Colyer Avenue (i.e. missing sections) and provide full length footpath (west side).
- Complete kerb and guttering in West Street, west side (Junction Street to North Street), and provide shared user path (west side).
- Construct kerb and guttering in Westhaven Avenue (full length, Shoalhaven Street to West Street).
- Construct Shared User Path full length North Street (Scenic Drive to Shoalhaven Street).
- Construct Shared User Path full length Shoalhaven Street (North Street to Scenic Drive).
- Construct raised threshold with pedestrian refuge North Street (immediately west of West Street).
- Construct raised pedestrian crossing Shoalhaven Street (i.e. frontage of development, location to suit new building main pedestrian access location, utilise one of the available existing street lighting locations in this vicinity).
- It is requested that all external works, including all regulatory signs/lines, be referred to the Shoalhaven Traffic Committee for approval.

4. Floodplain Unit Comments/Requirements

Flooding

- The proposed site is not affected by a PMF event in the Lower Shoalhaven River.
- Council has not completed a Flood Study that investigates overland flow in the Nowra area. Section 3.2 of the Stormwater and Flooding Assessment notes that overland flow paths may pass through the site given the land slopes towards the east. The potential location of critical overland flow paths in a local catchment PMF event should be investigated and considered by the civil design as required.
- It is noted that Chapter G9, SDCP 2014 requires buildings that need special evacuation consideration (including hospitals and health services facilities) to have a minimum floor level at or above the PMF. Whilst the site is not affected by a riverine PMF event, the

minimum floor levels should be located above a local catchment PMF level if there was a critical overland flow path that impacts the site.

- The Stormwater and Flooding Assessment refers to the updated Lower Shoalhaven River Flood Study being prepared by Cardno. It is noted that this Flood Study has not yet been completed or adopted by Council and only a draft revision has been made available to the public. Hence the findings from this draft Flood Study report should not be used to support proposed developments at this stage.

On Site Detention (OSD):

- OSD has been proposed to reduce post-development peak flows to less than pre-development levels. The inclusion of OSD is considered crucial by Council to ensure the development does not result in adverse flood impacts to existing downstream properties.
- The OSD has been sized for the 5% and 1% AEP events only. It is noted that SDCP 2014 requires OSD to consider the 20%, 5% and 1% AEP events. Modelling should also be completed for the 20% AEP event to ensure there are no adverse flood impacts in this event which is used to size the minor piped stormwater network. The capacity of the existing stormwater network immediately downstream of the site should also be assessed to ensure it has adequate capacity for the 20% AEP event without surcharge into overland flow paths.
- DRAINS has been used to size the OSD tank and this modelling approach is supported by Council.

Water Sensitive Urban Design (WSUD)

- The pollutant reduction targets documented in Section 4.1.3 of the Stormwater and Flooding Assessment are incorrect and from a historic version of Chapter G2, SDCP 2014. The TSS, TP and TN reduction targets are 80%, 45% and 45% respectively. There are also gross pollutant targets included in Chapter G2.
- The stormwater treatment strategy comprises a 210kL rainwater tank (for coolant tower reuse), OceanGuard pit baskets and StormFilter cartridges. These devices are considered acceptable in private property as has been proposed.
- It is important that the rainwater tank internal reuse demand is appropriately selected for use in the MUSIC Model. It is also important that appropriate conditions are provided to ensure that the stormwater treatment devices are inspected and maintained in accordance with best practice industry guidance (such as the Guidelines for the Maintenance of Stormwater Treatment Measures, Stormwater NSW) to ensure the pollutant reduction targets are achieved in practice.
- Section 4.1.1 of the Stormwater and Flooding Assessment also notes that a rain garden is proposed between the carpark and building entry. This bioretention device however is not included in the MUSIC Model Schematic in Figure 4-3. It is important that appropriate conditions are provided to ensure that the rain garden is inspected and maintained in accordance with best practice industry guidance.

5. Environmental Assessment Officer Comments/Requirements:

Biodiversity Development Assessment Report (BDAR)

- The BDAR has been prepared using the planted native vegetation – streamlined assessment module (Appendix D of the Biodiversity Assessment Method (BAM) 2020). An assessment of requirements for applying the Planted Native vegetation assessment module is provided in Section 3.3 of the BDAR and a map of the verified vegetation on the site is in Figure 4.
- Following a site inspection on 24 October 2022, and a review of the relevant documents and databases, Council concurs that the trees within the development footprint are planted, and the proposed development meets the requirements to be assessed in accordance with the planted native vegetation streamlined assessment module.
- It is noted that remnant native vegetation has been identified outside of the development footprint (PCT 1209). Eco Logical Australia Pty Ltd has determined that this vegetation will not be impacted by the proposed development. Council agrees with this determination if appropriate mitigation measures are implemented during construction. The remnant native vegetation has been mapped within the proposal footprint in some small areas (proposed roundabout), however, this is due to overhanging canopy of large trees that will be retained.
- Eco Logical Australia Pty Ltd conducted a general habitat survey and vegetation assessment on 18 November 2021 and 29 January 2022 and did not record any threatened species using the site during their surveys or record any significant habitat features such as hollow bearing trees within the vegetation to be removed. It has been noted that the vegetation to be removed may provide occasional foraging habitat for wide-ranging threatened species, including Square-tailed Kite, Little Lorikeet, Gang-gang Cockatoo, Grey-headed Flying-fox and several microbat species. Council agrees with this assessment. No species credits are required when applying the planted native vegetation streamlined assessment module.
- Eco Logical Australia Pty Ltd has provided a summary of the measure applied to avoid and minimise impacts to biodiversity values. These measures include retaining the remnant native vegetation within the southern part of the lot that contains hollow bearing trees and higher value foraging resources for local native fauna. The proposed development is located within planted native vegetation or existing developed areas and park. Based on this, Council considers that reasonable measures have been taken to avoid and minimise impacts to biodiversity values.
- The BDAR has assessed (Table 4) potential prescribed impacts described in Section 6.1 of the Biodiversity Conservation Regulation 2017. Eco Logical Australia Pty Ltd has determined that the proposal will only have minimal impacts to connectivity. Council concurs with this conclusion as the vegetation to be removed provides minimal connectivity to surrounding scattered vegetation or bushland areas in the broader landscape. No additional biodiversity credits are recommended to offset additional prescribed biodiversity impacts.
- A map of the proposed impacts is provided in Figure 11 of the BDAR. No biodiversity credits are required to be offset with the application of the planted native vegetation assessment module. Section D.2 of the BAM 2020 requires the assessor to provide

measures to mitigate or minimise impacts to threatened species and biodiversity values. Mitigation measures are provided in Sections 7.3 and 7.4 of the BDAR. These measures will be incorporated into recommended consent conditions.

■ The following conditions of consent are recommended.

○ Native Vegetation and Habitat

The removal and/or disturbance of native vegetation and habitat on the property, including canopy trees, understorey and groundcover vegetation, is restricted to that required to construct and maintain the development in accordance with the approved plans

○ Retention or Vegetation Within the Approved Asset Protection Zone

Trees and other vegetation must be retained within the Asset Protection Zone (APZ) where it complies with the prescriptions for Planning for Bushfire Protection APZ guidelines.

○ Ecological consultant – Engagement

Prior to the commencement of clearing work, a suitably qualified and licensed ecological consultant with wildlife handling experience must be engaged to guide and supervise the clearing work and protection of environmental features on the site. Evidence of engagement must be submitted to Council.

○ Project Arborist- Engagement

Prior to the commencement of clearing work, a suitably qualified and practicing Level 5 Project Arborist that has current membership with either Arboriculture Australia (AA) or Institute of Australian Consulting Arboriculturists (IACA) must be engaged to guide and supervise the clearing work and ensure the *Tree Protection Report* (prepared by Moore Trees) is implemented accordingly. Evidence of engagement must be submitted to Council.

○ Tree Protection

Prior to the commencement of any clearing works the following requirements must be met to the satisfaction of the Certifier:

- a) To ensure the protection of trees affected by the proposed development, trunk protection is required for all trees to be retained and a temporary protective barrier or similar visible material must be installed in accordance with the approved *Tree Protection Plan* and retained until all work are complete.
- b) The dripline of trees to be retained must be clearly identified and protected with temporary barrier fencing in accordance with *AS 4970: Protection of trees on development sites*.
- c) The Project Arborist must certify the protection measures are installed to the required specifications prior to commencement of construction. The trunk protection should remain in place for the duration of construction.

- Identification of Environmental Features

Prior to the commencement of any clearing work, a suitably qualified ecological consultant must identify and physically mark environmental features to be retained, as shown on the approved plans.

- Inspection of Tree Protection Measures

Shoalhaven City Council must inspect and certify in writing that tree protection measures are in place before any work on site can commence.

- Erosion and Sediment Control

Prior to the commencement of any works, the approved erosion and sediment control measures must be implemented by the contractor and inspected and approved by the PCA prior to the commencement of any other site works. The erosion and sediment measures must be maintained for the life of the construction period and until runoff catchments are stabilised.

- Timing of Works- Pre- Clearance Survey

To protect potential nesting fauna, tree removal works must only occur after a pre-clearance survey is undertaken by the engaged ecological consultant that conclude no fauna is occupying/nesting or denning within any trees located within the property boundaries.

- Tree Protection- Monitoring

The Project Arborist must inspect all trees to be retained bi-monthly to ensure tree protection measures are being adhered to and the health of all trees is not being adversely affected.

- Tree Protection- Exclusions Within the Tree Protection Zone

The following activities shall be excluded within the TPZ:

- a) Excavation, compaction or disturbance of the existing soil.
- b) The movement or storage of materials, waste or fill.
- c) Soil level changes.
- d) Disposal and runoff of waste materials and chemicals including paint, solvents, cement slurry, fuel and oil.
- e) Other toxic liquids.
- f) Movement or storage of plant, machinery, equipment or vehicles.
- g) Construction access points
- h) Position of site sheds and latrines and temporary services
- i) Any activity likely to damage the trunk, crown or root system of the trees.

The Project Arborist must be notified in the event any disturbance within the TPZ of trees to be retained is required.

- Project Arborist- Supervision

The catch drain (CD) proposed along the eastern boundary near trees to be retained will require project arborist supervision and guidance to ensure remnant trees are retained safely.

○ Vegetation Removal Protocol

- a) To protect wildlife occurring within the site, all clearing works are to be supervised by a qualified consultant ecologist experienced in wildlife handling and rescue.
- b) All vehicles and mechanical plant must be inspected for wildlife prior to operation.
- c) Vegetation is to be removed using a staged approach to allow wildlife to naturally flee the area.
- d) All vegetation to be removed must be inspected for wildlife prior to removal.
- e) Trees to be cleared must be felled into the development area carefully so as not to damage trees to be retained in or beyond the development footprint.
- f) If any wildlife is disoriented or injured during clearing works, works must stop immediately, and the consultant ecologist is to advise and responsibly rescue and relocate the animal(s).
- g) In the event of an unexpected find of a threatened species, works must stop immediately, and the developer and consultant ecologist must call Council's Environmental Assessment Officer to determine whether additional assessment is required.
- h) Within 10 days of completing clearing work, the engaged consultant ecologist must provide to Council written evidence of any fauna detected during clearing

○ Wildlife Protection Measures

- a) All vegetation to be removed must be inspected for wildlife prior to removal. All structures proposed for demolition may provide habitat for microbats and other native wildlife and must be inspected prior to removal.
- b) Works must cease until any wildlife present has relocated.
- c) All vehicles and mechanical plant must be inspected for wildlife prior to operation.
- d) All trenches must be inspected for wildlife prior to backfilling
- e) Any injured wildlife must be referred to a local Veterinary Clinic or into the care of Wildlife Rescue South Coast (0418 427 214).

○ Timing of Works

To protect adjoining bushland, works involving soil disturbance must not take place during heavy rainfall periods, other than work necessary to stabilise the site.

○ Trenching Requirements

A small playground area is proposed between Trees 40 and 46. Any trenching for services such as for new lighting and/or water fountains shall be kept outside of any TPZ area of adjoining trees.

○ Tree 50 Tree Protection Requirements

- a) Existing soil levels are to be retained within the TPZ of Tree 50 and the pedestrian path is designed so that water does not pool within the TPZ area (See Note 1, Tree Protection Plan). The entire area under the drip line of Tree 50 should be planted out as garden area (Plate 12) in order reduce the

element of risk from limbs that may fail from a tree of this age. The current plans show the area being turf (See Note 2, Tree Protection Plan).

- b) A flat bucket excavator shall be used to excavate the trench within the TPZ of Tree 50 to ensure no roots greater than one hundred (100) millimetres are severed. Roots greater than one hundred (100) millimetres will be retained and the pipes threaded under the roots. A spotter shall be used for these works to ensure roots greater than one hundred (100) millimetres are retained and the canopy of Tree 50 is not impacted. The Project Arborist shall supervise these works.

- Tree 74- Project Arborist

Tree 74 may be possible to retain however this will need to be determined once the driveway excavations commence. If woody roots are required to be severed, then Tree 74 may require removal. The Project Arborist should be consulted to make this decision.

- Stockpiling Areas

Any area set aside for the stockpiling of soil and waste shall have the appropriate erosion control measures around this area as specified by an engineer. These erosion control measures shall be monitored and maintained regularly throughout the construction period of the site. These measures are to restrict any waste material entering the TPZ areas of the trees to be retained.

- Potential Tree Damage

If the retained trees are damaged, the Project Arborist should be contacted as soon as possible. The Arborist will recommend remedial action so as to reduce any long-term adverse effect on the tree's health.

- Root Pruning

If excavations are required within a TPZ this excavation shall be done by hand to expose any roots. Any roots under fifty (50) millimetres in diameter may be pruned cleanly with a sharp saw. Tree root systems are essential for the health and stability of the tree. Severed roots shall be treated with Steriprune®, available at most large Hardware Stores.

- Tree Protection- Final Certification

Upon completion of construction the Project Arborist will certify that the health and condition of all trees to be retained have not been adversely affected by the development.

- Landscaping

For the life of the development:

- a) Landscaping must be maintained in accordance with the approved Landscape Plan.
- b) The planting of plant species listed in the *South East Regional Strategic Weed Management Plan 2017 – 2022* is prohibited.

6. Property Services Comments/Requirements:

- An easement for water supply located in the south east corner of Lot 104 DP 1165533 and adjacent to the eastern boundary is being negotiated for realignment with Council's Shoalhaven Water. Extinguishment/realignment is being managed by Shoalhaven Water.

7. Shoalhaven Water Comments/Requirements:

- A water development Notice application is required from Shoalhaven Water.
- A certificate of compliance will be required once all Shoalhaven Water related works are completed.
- Detailed hydraulic will need to be submitted for review.
- Servicing plan for water connection is required and Water meter application.
- Water connection for fire services needs to be detailed.
- Watermain relocation required prior to commencement of works.
- Section 64 fees are applicable.
- Liquid trade waste and backflow prevention will be required.
- Any application will need to demonstrate that the new building can drain to sewer via gravity. Designs will be required if not possible.
- The following conditions of consent are recommended.
 - A Certificate of Compliance must be obtained to verify that all necessary requirements for matters relating to water supply and sewerage (where applicable) for the development have been made with Shoalhaven Water. A Certificate of Compliance must be obtained from Shoalhaven Water after satisfactory compliance with all conditions as listed on the Notice of Requirements and prior to the issue of an Occupation Certificate, Subdivision Certificate or Caravan Park Approval, as the case may be.
 - Prior to the Commencement of any works, all conditions listed on the Shoalhaven Water Notice of Requirements under the heading "Prior to the Commencement of Any Works" must be complied with. Written notification must be issued by Shoalhaven Water and provided to the Certifier.
 - Shoalhaven Water – Certificate of Compliance
Prior to the issue of any Occupation Certificate, a Certificate of Compliance under section 307 of the *Water Management Act 2000* must be obtained from Shoalhaven Water to verify satisfactory compliance with all conditions for the supply of water and sewerage, as listed on the Notice of Requirements.

If the development is to be completed in approved stages, or application is subsequently made for staging of the development, separate Compliance Certificates must be obtained for each stage of the development.

8. Environmental Health Officer Comments/Requirements

- Consideration should be given to the impact of the proposed helipad on sensitive receptors through the design and location of the helipad. AS20121 uses Australian Noise Exposure Forecast (ANEF) charts and contour maps that forecast aircraft noise

levels. AS2363 – Acoustics – Measurement of noise from helicopter operations (withdrawn) provides guidance on the assessment of helicopter noise. Environmental Principles and procedures for Minimising the Impact of Aircraft Noise (AirServices Australia 2022) and the Guidelines for the establishment and operation of on-shore helicopter Landing Sites (CASA Civil Aviation Advisory Publication (CAPP) 92-2(2), 2014; should be considered.

- The recommendations outlined in the Preliminary Site Investigation (PSI) should be undertaken, noting that a Preliminary Environmental Site Assessment (PESA) is recommended and if required a Detailed Site Investigation (DSI).

If you need further information about this matter, please contact Lachlan Jones, Senior Development Planner on 4429 3111 **between the hours of 9.00 – 10.30am Monday to Friday.**

Regards

A handwritten signature in black ink that reads "Lachlan Jones". The signature is written in a cursive, slightly slanted style.

Lachlan Jones
Senior Development Planner
City Development