

Appendix B – Project Mitigation Measures

Amendments to the approved SSD 13619238 mitigation measures sought under this Modification Application are provided in ***bold italics*** below.

Mitigation Measures

Detailed Design

- All proposed buildings and structures are to be designed and constructed in accordance with the requirements of the *National Construction Code 2019* and relevant Australian Standards.
- All proposed buildings and structures are to be designed and constructed in accordance with the relevant requirements of the Building Code of Australia (BCA).
- Where the design does not meet the prescriptive deemed-to-satisfy (DtS) provisions of the BCA as identified within the Structural Statement prepared by Van Der Meer dated 14 April 2022 (EIS Appendix KK) and Accessibility Report prepared by ABE Consulting dated 6 May 2022 (EIS Appendix DD), appropriate performance solutions should be documented and provided at construction certificate stage in accordance with the BCA.

Construction Management

- A detailed Site Environmental Management Plan, consistent with ISO 14001:2015, the *Protection of Environment Operations Act 1997* and the *Protection of Environment Operations (Noise Control) Regulation 2008*, is to be submitted to the Principal Certifying Authority prior to the commencement of works. The detailed Site Environmental Management Plan should not be inconsistent with the submitted Construction Management Plan prepared by Roberts Co dated 9 June 2022 (EIS Appendix E) ***as amended by the Construction Environmental Management Plan prepared by Hindmarsh dated 15 October 2025 (MOD 2 Appendix G)***.
- A detailed Construction, Pedestrian and Traffic Management Plan (CPTMP) is to be submitted to the Principal Certifying Authority prior to the commencement of works. The detailed CPTMP should not be inconsistent the preliminary CTMP prepared by Transport and Traffic Planning Associates dated May 2022 (EIS Appendix K).
- Traffic and pedestrian impacts during construction are to be managed in accordance with the detailed CPTMP.

Heritage

- Conservation work to Pallister House is to be undertaken in accordance with the Schedule of Conservation Works prepared by Built Environmental Heritage Group dated 6 May 2022 (EIS Appendix F), including implementation of the following works, as required:
 - Sandstone repairs;
 - Ashlar render repairs;
 - Repairs to original timber floorboards, both internal and external, as appropriate;
 - Stained glass and glass window repairs;
 - Tile repairs; and
 - Marble repairs.
- A final Heritage Interpretation Strategy (HIS) is to be submitted to the PCA prior to the issuance of the relevant occupation certificate. The HIS is to detail the heritage interpretation initiatives to be adopted for Pallister House, and should not be inconsistent with the preliminary HIS prepared by Cultural Heritage Connections and Built Environmental Heritage Group dated 6 May 2022 (EIS Appendix G), and should consider the following interpretation strategies identified within the preliminary HIS:
 - Interpretive panels;
 - Art displays;
 - Interactive art displays;
 - Paving inlays;

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- In situ conservation of archaeological remains;
 - Adaptive re-use of architectural elements;
 - QR codes;
 - Website and events;
 - Conservation of the heritage item; and
 - Vegetative planting.
- A detailed Aboriginal Cultural Heritage Management Plan (ACHMP) is to be submitted prior to commencement of works. The ACHMP is to be informed by sub-surface testing to be undertaken at the site. The ACHMP should not be inconsistent with the Concept Plan (SSD 8699) ACHAR dated December 2018, and the Updated Aboriginal Archaeological Impact Assessment and Consultation Report prepared by Cultural Heritage Connections dated May 2022 (EIS Appendix O).
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Archaeology

- Implement the recommendations of the Archaeology Updated Impact Assessment prepared by Cultural Heritage Connections dated May 2022 (EIS Appendix M), including the following requirements:
 - The Archaeological Research Design & Excavation Methodology (ARDEM) provided within the Archaeology Updated Impact Assessment is to be reviewed by Heritage NSW and submitted to the PCA prior to commencement of works.
 - All excavation works at the site are to be undertaken in accordance with the ARDEM.
 - As per Condition B14 of the SSD 8699 consent, results of the archaeological works should be documented in an excavation report that includes opportunities for *in situ* conservation within 12 months of completion of the archaeological excavation. It should be provided to the Planning Secretary, the Heritage Council of NSW and to the local Council's local studies unit.
 - Consideration should be given within the report to conservation of any significant artefacts and protection in perpetuity by the landowner.
 - Relevant information should be included in the interpretation plan prepared for the project area.
 - Information relating to potential heritage and a procedure for dealing with unexpected finds should be included within site inductions for all contractors involved in ground disturbing works. Heritage provisions and/or protocols should be included in the construction management plan for the development.
 - In the event that unexpected historical archaeological objects or deposits are uncovered, works should cease and a qualified Archaeologist contacted to assess the significance of the material and recommend whether further investigation is required.
 - If the finds are found to be Aboriginal objects, the Office of Environment and Heritage must be notified under section 89A of the *National Parks and Wildlife Act 1974*.
 - In the event that potential human remains are uncovered, work must cease immediately, and the NSW Police Force and Coroner's Office notified.
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Contamination, Remediation, and Geotechnical

- Remediation of the site is to occur in accordance with the detailed remediation methodology as outlined within the Additional Site Investigation prepared by JK Environments dated 5 May 2022 (EIS Appendix T) and Remediation Action Plan prepared by JK Environments dated 5 May 2022 (EIS Appendix U), including:
 - A Remedial Works Plan is to be prepared detailing additional investigations and management of Hazardous Ground Gas (HGG) at the site, prior to issuance of the relevant construction certificate.
 - A site validation report is to be prepared on completion of remediation activities and submitted to the consent authority to demonstrate that the site has been made suitable prior to issuance of any occupation certificate.
 - Demolition of existing buildings is to incorporate the findings, protocols and recommendations as contained within the Hazardous Building Materials Survey by JK Environments dated 5 May 2022 (EIS Appendix V), including that of the following:
 - An Asbestos Management Plan and Asbestos Removal Control Plan is to be prepared for works in areas containing asbestos. Asbestos is to be removed by a licensed Class A Asbestos Removalist.
 - All synthetic mineral fibres and lead containing paint films is to be removed by an experienced hazardous materials removals contractor in accordance with the relevant regulations and codes.
 - Removal of light fittings potentially housing PCB metal capacitors is to occur in accordance with the Environmental Protection & Heritage Council's *Polychlorinated Biphenyls Management Plan*.
 - Areas of the existing building not covered by the Hazardous Building Materials Survey should be inspected prior to the commencement of works.
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- Construction of the proposed development should not be inconsistent with the recommendations and construction strategies as identified within the Additional Geotechnical Investigation prepared by JK Geotechnics dated 10 May 2022 (EIS Appendix W).
 - Construction of the proposed development should not be inconsistent with the recommendations of the Salinity Investigation prepared by JK Environments dated 8 April 2022 (EIS Appendix Y), including as follows:
 - A detailed Salinity Management Plan (SMP) is to be prepared prior to the issuance of the relevant construction certificate.
 - The detailed SMP is to be reviewed by the project team (civil, construction and landscaping) and incorporated into the project design, as required.
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Wind Impact

- Buildings and structures at the site are to ensure that a suitable level of wind pedestrian comfort is provided to all communal and public open spaces, building entry points, and balconies on the site.
 - Ensure that the detailed design of buildings and structures at the site continues to implement recommendations provided within the Wind Study prepared by VIPAC dated 24 March 2022 (EIS Appendix Q), being that of the following:
 - Provision of 1.5m high solid wind screens at locations specified in Figure 29 of the Wind Study to ameliorate wind conditions.
 - Provision of 1.5m-1.8m planter at the south western corner of level 5 of the hospital building as specified in Figure 30 of the Wind Study.
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Noise and Vibration

- Future detailed design and selection of mechanical plant and equipment for the proposal should be made with relevance to the recommendations for mechanical plant detailed in Section 5.3.3 of the Noise and Vibration Impact Assessment prepared by Acoustic Logic dated 7 June 2022 (EIS Appendix Z).
 - Acoustic treatments to future buildings shall be implemented in accordance with the recommendations of the Noise and Vibration Impact Assessment, including as follows:
 - Single glazing to all façade glazed elements. Glazing will vary from Rw 27 to 35 acoustic performance, depending on size and location. All elements will need to be installed with full perimeter rubber acoustic seals.
 - Standard lightweight façade elements will include steel studs, top hats, acoustic insulation and plasterboard or Fibre Cement (FC) sheet lightings. Extent of insulation and internal sheet linings are to be determined by an acoustic consultant.
 - All opening or penetrations in ceiling must be acoustically sealed. If lightweight elements are proposed, these specific cases will need to be reviewed to address any necessary acoustic treatment.
 - Provision of mechanical ventilation to the units within the northern serviced seniors housing building facing River Road, in accordance with AS 1668.2S.
 - Provision of mechanical ventilation to spaces within the hospital building facing River Road.
 - Construction noise and vibration impacts shall be managed in accordance with the recommendations and mitigation measures outlined within the Noise and Vibration Impact Assessment, including as follows:
 - Trucks and bobcats to use non-tonal reversing beacon (subject to OH&S requirements).
 - Avoid careless dropping of construction materials into empty trucks.
 - Trucks, trailers, and concrete trucks (if feasible) should turn off their engines during idling unless ignition needs to remain on during concrete pumping.
 - In the event of a noise complaint, the procedures outlined in the Noise and Vibration Impact Assessment should be adopted.
 - A detailed Noise Management Plan is to be developed by the main contractor that describes in detail the construction phases, programme, processes and equipment used, noise impact assessment and proposed mitigation and management.
 - Consideration of alternative construction techniques for high noise generating equipment, where feasible.
 - At site induction, a copy of the detailed Noise Management Plan is to be available to contractors. The location of the Noise Management Plan should be advised in any site induction. Site induction should also detail the site contact is to be notified in the event of a noise complaint.
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Stormwater and Flooding

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- Stormwater controls and management measures are to be implemented in accordance with the Stormwater Management Report prepared by Van Der Meer dated 4 May 2022 (EIS Appendix BB). The following stormwater control elements identified in the Stormwater Management Report are to be delivered at the site:
 - A pit and pipe network to collect minor storm runoff from areas;
 - 2x 70kL rainwater tanks with stormwater treatment system to support sustainability outcomes;
 - Overland flow paths to carry flows from major storm events through the site in a safe manner;
 - Proposed point of discharge are to be to the:
 - existing council stormwater pipe for the western catchment area; and
 - kerb outlet on St Vincent Road on the for the eastern catchment area.
 - Civil works at the site are to be undertaken as consistent with the Civil Engineering Plans and Erosion and Sediment Control Plans attached to the Stormwater Management Report.
 - In line with the recommendations of the Flood Assessment prepared by Solutions Water Modelling dated 14 April 2022 (**EIS Appendix CC**), a Flood Emergency Response Plan is to be prepared for the site prior to the issuance of the relevant occupation certificate.
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Waste Generation and Management

- Waste management during demolition, construction and operation is to generally be in accordance with the Waste Management Plan prepared by Waste Audit dated 6 May 2022 (EIS Appendix EE).
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Utilities and Services Infrastructure

- Where necessary, utilities and services infrastructure shall be extended and augmented in accordance the requirements and specifications of the relevant utilities authority, and with reference to the Services Infrastructure Report prepared by JHA dated 24 May 2022 (EIS Appendix AA).
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Crime Prevention and Site Safety

- Implement the recommendations provided in the Crime Prevention Through Environmental Design (CPTED) Report prepared by Ethos Urban dated 29 April 2022 (EIS Appendix FF) at the construction and operational stages of the project, including that of the following:
 - Surveillance: To ensure and maintain opportunities for natural and incidental surveillance through effective lighting, community creation and interaction and environmental maintenance.
 - Lighting and Technical Supervision: All lighting throughout the private and public areas are to meet the minimum Australian Standard AS/NZ 1158 and the implementation of a CCTV network.
 - Territorial Reinforcement: Clearly delineate between public and private space, CCTV signage and wayfinding signage throughout the site.
 - Design Definition and Designation: Appropriate wayfinding signage integrated with the wider site.
 - Activity and Space Management: An active management approach should be adopted for any public spaces on the site, to be implemented following issue of an Occupation Certificate.
 - Environmental Maintenance: Ensure there are mechanisms for the ongoing maintenance of the building including a rapid removal policy for vandalism and removal of graffiti and vegetation maintenance.
 - Access Control: Security access measures including gates/doors and swipe access between private and public spaces and appropriate security for the mailboxes.
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Dangerous Goods Management

- A detailed Dangerous Goods Report is to be prepared for the proposed development prior to issuance of the relevant construction certificate. The detailed Report is not to be inconsistent with the Preliminary Dangerous Goods Screening Report prepared by JHA dated 5 May 2022 (EIS Appendix GG). The transportation, storage and use of dangerous goods at the site is to be in accordance with the Dangerous Goods Report.
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Bushfire

- Implement the findings and the recommendations of the Bushfire Protection Assessment prepared by Travers Bushfire & Ecology dated 6 April 2022 (EIS Appendix HH), including that of the following:
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- Asset Protection Zones (APZs) are to be provided to the proposed development as outlined within the Bushfire Protection Assessment.
 - APZs are to be maintained in perpetuity and managed as outlined in EIS Appendix 4 of *Planning for Bush Fire Protection 2019* (PBP 2019) and the NSW RFS document 'Standards for asset protection zones'.
 - Building construction standards or the proposed future buildings located within 100m of forest / woodland vegetation or within 50m of grassland are to be applied in accordance with *AS3959 Construction of buildings in bushfire prone areas* (2018) or NASH Standard and Section 7.5 of PBP 2019.
 - A Bushfire Emergency Management and Evacuation Plan is to be prepared in accordance with with Section 6.8.4 of PBP 2019.
 - Access is to comply with the acceptable solutions outlined in Section 5.3.2 of PBP 2019.
 - Water, electricity and gas supply is to comply with Section 5.3.3 of PBP 2019.
 - Fencing is to comply with Section 7.6 of PBP 2019. All fences in bush fire prone areas should be made of either hardwood or non-combustible material. However, in circumstances where the fence is within 6m of a building or in areas of BAL 29 or greater, they should be made of non-combustible material only.
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Lighting

- Installation of external lighting is to comply with *AS/NZS 4282:2019 – Outdoor Lighting Obtrusive Effects*.
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