Appendix A
Response to Submissions - Table
Mechanical and Manufacturing Engineering Building (J17+ J18)
SSD – 12_5572

Issue Raised by Agency		Proponent's Response
Randwick City Council Submission		
UNSW Kensington Campus DCP – Campus 2020		
Application of DCP	o Council notes that while the requirement of the UNSW DCP may not hold strict applicability to SSD DAs, the DGRs specifically move to adopt the provisions of the DCP within the 'Policies Guidelines and Planning Agreements' requirements. o The aims and objectives outlines within the DCP hold strong relevant to informing appropriate development on the site and minimising consequent impacts.	o The Director General Requirements (DGRs) require the applicant to address (not adopt) the Campus 2020, UNSW Kensington Campus DCP and detail how the development promotes or is consistent with these provisions and strategic objectives. Under State *Environmental Planning Policy (State and Regional Development) 2011* Clause 11 'Exclusion of application of development control plans' states: "*Development control plans (whether made before or after the commencement of this Policy) do not apply to... (a) State significant development*" o Nevertheless, the DCP has been addressed within the EIS with an assessment against the strategic objectives and consistency with relevant provisions provided. o Appropriate consideration and weighting of the DCP provisions has been given in the preparation of this DA/EIS.
Height	o Building J17 currently exceeds the maximum building wall height of 18m having a wall height of approximately 21m and proposed height of 27m. o The proposal including the enclosure of plant exceeds the wall height control by 6m. o The enclosure of plant appears excessive and contributes to an increase in height, bulk and scale over the extent building. o Council consider that there are reasonable grounds for a reduction in height of this enclosure o The proposed height has potential to introduce a loss of view impacts to adjoining properties on Willis Street, and a visually bulky built form precedent.	o The proposed building height is suitable, given the merits of the application, noting that there is no LEP height control which governs development on this part of the site. o The Campus DCP identifies a maximum building height of 24m for Building J18. An 18m height limit with a depth of 30m has been identified within the Randwick LEP 2012. Should a development (with a complying envelope) be constructed on Building J18, views from these dwellings would be further diminished. o The plant room is requirement to house the plant to service the building uses, as well as mitigate acoustic impacts to nearby residents in Willis Street. o The proposed building height (RL 63.88) is sits marginally above that of the current maximum building height (RL62.22) (lift overrun). o Following submission of the EIS, the size and height of the plant enclosure was further considered by the architects in consultation with mechanical and structural consultants. o The design and required sizing of the plant enclosure has been considered extensively, and the dimensions provided are required to house the building plant requirements in a functional, efficient, and orderly manner. o The height of the building's plant allows for a superior environmental health outcome with regard to any potential Legionella outbreak from the cooling towers. The additional height allows for improved and required separation from the occupants of the building, as well as improved air through-flow over the towers. o Further, and more importantly, the plant enclosure has also been specifically designed to minimise the acoustic impact to adjoining residents and does not result in any other or new amenity impacts.
Legibility	o The DCP refers to the adjoining International Square and Engineering Road as gathering and connective spaces and the University Mall as an 'iconic Campus space' that must be reinforced. o The proposed development is considered acceptable as it maintains the envisaged education campus use within the DCP whilst augmenting its connection with existing public domain spaces of the International Square and Engineering Road.	o Council's support noted. o The design of the proposal will integrate and connect with the existing 'connective spaces', and promote activation of the ground level.
Landscape	o The trees located within the courtyard and John Lions Garden are of 'high retention priority' as part of the John Lions Garden (contemplative space). o The existing plans and documentation do not provide a definitive notation or statement that the existing	o The trees located within the courtyard of the John Lions Garden are to be retained, and protected during construction as per the details within the Construction Management Plan (Page 5 of Appendix J). o The existing trees are identified on both the Landscape Plan (Appendix F) and Architectural Plans

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	trees will be retained. o Additionally, the Landscape Plan does not show how the existing John Lions Garden will be integrated with the new landscape elements in terms of design and plantings.	(Appendix A) to be retained are not indicated, nor intended for removal. o The landscape plan and accompanying statement indentifies integration of the new landscaping with the existing landscaping of the John Lions Garden, such as the installation new paving/pathways and the reinstatement of existing perimeter planting.
Building	o Part 5.7 of the DCP refers to the requirement for regulating building alignments (new buildings) o The proposal retains the inverted 'L' shape footprint however the increase in height, bulk and scale negates the gains obtained by retaining the existing building alignment.	o The building footprint proposed is predominantly the same as the existing. o The new additions to the building footprint are primarily to the eastern side of Building J17 to provide a rationalised design and level connection to Willis Lane. This area is not identified as a 'regulating alignment' under section 5.7 of the DCP. Figure 5.7 identifies the western and southern elevations of Building K17 as 'regulated alignment' points which do not relate to the proposed development. o Furthermore the eastern elevation of Block J18 which is marked as being a regulated alignment point does not involve any expansion of the existing building footprint as part of this application.
Urban Design		
	o The proposed addition is considered to adopt relevant themes and design cues and retains harmony and complementary relationship between the old and new elements of the building. o Inclusion of the cafe use linked to the retained forecourt is commended as it continues the gathering and connective space function of the existing building and surrounds. o Weather protection and cover at critical access points is supported however should not lead to any future closure of Willis Lane as an important access way and thoroughfare. o The southern wing of Building J17 will define the space between eastern elevation and corridor of the Engineering Building. Council notes that the proposed unit paving treatment along Willis Lane which will suitably define the connective space.	o Council's support is noted. o The weather protection to Willis Lane, namely the awning at Level 3 will not impact vehicle access through Willis Lane. o Willis Lane has not been identified to be closed and will remain open to traffic from within the Campus.
Impacts of the Proposed Development		
Height and views	o The Increased height will potentially affect existing residential development nearby Willis Street in terms of visual bulk and scale privacy and views. o Whilst the screening from Established planting to the western side of Willis Street is noted, the view loss from living areas and balconies of specific properties cannot be adequately ascertained. o Potential privacy impact on existing residential developments in nearby Willis Street does not appear to be addressed in the EIS.	o The proposed increase in building height is primarily generated by the plant enclosure to Building J17 and is not considered to impact existing views from residential development on Willis Street. o The existing views available from the residential properties to the east of the site from the eastern side of Willis Street are substantially screened by the existing row of well established trees and landscaping at the western side of Willis Street. These existing views could only realistically be described as being impaired, limited or principally of sky. The Campus DCP also identifies a maximum building height of 24m for Building J18, with the LEP 2012 establishing and height of 18m. o With regard to privacy, the construction of the plant enclosure has been designed to mitigate the acoustic impact to the Willis Street residents noting that the existing plant is not specifically acoustically treated in this regard. Furthermore there are no overlooking or visual privacy impacts between the site and residential dwellings, given the space is not habitable and is an education facility. It is further noted, that given the separation distance of some 70m, the separation distance relating to overlooking and visual privacy would be more than fully compliant if the proposal were to be a residential development (SEPP 65 Rules of Thumb). o Accordingly, there will be no substantial or discernible increase in height or loss of view from outside of the Campus.

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Car Parking		
Student numbers and Car Parking	o It is considered reasonable that should there be an increase in student/staff numbers, any additional car parking should be met on-site so as to off-set any additional on-street parking demand. It is noted that this would be at odds with the parking strategy within the DCP. o Appropriate assessment of parking and traffic impact, having regard to the parking strategy of the DCP, must be made in any future increase in student numbers envisaged in the refurbishment of the facility beyond this current DA.	o Council's support for a strategic, Campus-wide approach to parking in its Randwick Education and Health Precinct Plan is noted and acknowledged. o As addressed in the EIS and the accompanying Traffic and Parking Report prepared by Arup (Appendix K of the EIS), the proposal will not contribute to an increase in students or staff on the Campus, particularly with regard to parking. The additional GFA (including the 'warm shell' space) will provide space for existing students and will not generate any additional demand for car parking. o Given the building was built in the 1960s, the standard/requirements for student and staff teaching space and facilities has changed, relevant to contemporary standards. The proposed development is a response to this need for an upgrade of facilities to a contemporary standard. o In addition to the use of the School and Faculty, the 'warm shell' space proposed within Building J17 has been engineered to be used as temporary/flexible space for the University. The 'warm shell' fitout will cater for a number of options which are being considered by the University including: Examination Space o Currently the University hires external exam rooms or space (such as Royal Randwick Racecourse) to house student exams. The ability to use this space during exam periods would allow student to undertaken examinations on the Campus and within their own Faculty in purpose-built space. Temporary/Flexible Teaching Space o The 'warm shell' may be utilised as a temporary/flexible teaching space, which has the potential to allow for collaboration between Schools and Faculties. This space may also be used as exhibition/studio space by these schools. Decanting Space o The space may be used for the decanting of required teaching space during the demolition construction of other buildings on the Campus, so as to minimise disruptions to students and staff and thereby the need to secure (at some expense) alternative space off-Campus. o All of the potential uses of the 'warm shell space' do not require additional parking and improve the operation of the Campus to contemporary standards. Importantly the proposed development and the warm shell space will not contribute to increased staff or students. o Further, it is worth noting that the small increase in GFA does not result in any additional demand upon parking or, for that matter, any social or physical infrastructure on or around the Campus (see below in relation to S94A Contributions).
Bicycle Parking	o The provision of bicycle racks on the northern elevation is noted, however it is considered reasonable to require additional bicycle riding facilities (including more racks and associated change rooms).	o The University is currently in the process of undertaking a comprehensive and Campus wide strategic review of the existing and future demand for bicycle parking. The future increase in bicycle racks and associated bicycle parking facilities will be in context with this review. o To separately address campus-wide strategic bicycle planning via this development alone has the potential to undersupply other areas of greater-future demand. o The bicycle facilities that have been proposed within the site are provided to meet the current demand.

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Environmentally Sustainable Development		
	o The ESD Report identifies positive steps and a comprehensive range of measures to achieve sustainability. However, the report only provides minimal details on the energy efficient measures in design, recycled material and use of renewable technologies.	o Following the lodgement of the EIS and as part of the design development, further ESD investigation has been undertaken by the University and its ESD consultant. In addition to the Sustainability Design Initiatives outlined in the ESD Statement prepared by Arup (included as Mitigation Measure of the EIS) the following initiatives are being considered with a focus on reuse of land which has already been developed and reuse of existing materials where possible. Some of these initiatives include, but are not limited to: Management o Environmental management - encouraging and recognise the adoption of a formal environmental management system in line with established guidelines during construction o Waste management – minimising construction waste and disposal o Maintainability – encourage and recognise design those facilities and minimised the need for ongoing building maintenance Indoor Environment Quality o Ventilation rates o Air change effectiveness o CO_2 monitoring and control o Encouraging daylight access o Thermal comfort – encouraging and recognising a building that achieves high level of thermal comfort o Maintaining appropriate internal noise levels. o Daylight glare control o High frequency ballasts – avoiding low frequency flicker of lighting associated with fluorescents. o Electric lighting levels o Encouraging external views Energy o Energy efficiency o Minimising greenhouse gas emissions o Energy submetering o Peak energy demand reduction o Lighting zoning o Reducing peak demand on energy supply by reducing to unoccupied Areas o Efficient external lighting o Shared energy systems Transport o Encouraging and recognising development that limits the provision of car parking o Fuel efficient transport o Cyclist facilities – ensuring the provisions of adequate facilities o Commuting mass transport o Transport design and planning Water o Occupant amenity water – encouraging design that reduces use of potable water o Water metres – allowing for monitoring of water consumption within the building o Landscape irrigations

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		o Heat rejection water o Fire system water consumption o Potable water use in laboratories Materials o Recycling waste storage o Building reuse o Recycled content and re-used products and materials • Concrete • Steel • PVC • Timber • Design for disassembly • Dematerialisation • Flooring • Joinery • Loose Furniture Lab use and ecology o Re-use of land – encouraging the reuse of land which has previously been developed o Ecological value of the site – encouraging development that maintains or enhances the ecological value of the site Emissions o Refrigerant ozone depleting potential – recognising and encouraging the selection of refrigerants that do not contribute to long-term damage to the Earth's stratospheric ozone layer o Refrigerant GWP – selecting refrigerants that reduce the potential of increase global warming o Refrigerant leaks – minimising environmental damage from refrigerant leaks o Stormwater o Discharge to sewer – minimising discharge to Councils sewerage system o Light pollution o Legionella Innovations o Innovative strategies and technologies o Exceeding Green Star Benchmarks o Environmental Design Initiatives o It is requested that the detailed initiatives selected by the University are to be installed/carried out to the satisfaction of the Principal Certifying Authority.

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Environmental Health and Building Services Comments		
Noise	o The acoustic report confirms that the development will be capable of meeting the relevant noise criteria for the receivers subject to the implementation of acoustic noise controls measures. o It is recommended that compliance with the relevant criteria are to be included in the relevant Crown Completion Certificate application and written confirmation provided to Council prior to the issue of a Crown Completion Certificate.	o Noted. o At sometime in the future should J18 be built to a height of 24m to a 30m width in accordance with the current LEP and DCP, this would create further acoustic screening via the built form. o The recommendations of the Acoustic Report (included as mitigation measure EIS) including treatment and control of plant equipment will be adopted. o It is recommended that compliance with the relevant criteria are included in the relevant Crown Completion Certificate application and approved by the appointed Principal Certifying Authority prior to the issue of a Crown Completion Certificate.
Waste	o It is noted that the Waste Management Statement prepared by UNSW indicates that uses of the MMEPD will result in the storage or handling of waste which constitutes dangerous goods in quantities above the screening thresholds set out in SEPP 33. The EIS advises that the proposed generation of waste for the building has been considered against SEPP 33 and the proposed uses are not considered to be potentially hazardous or offensive.	o The EIS confirmed that the use does not involve, and will not store dangerous goods in quantities above the screening thresholds set out in SEPP 33 and Hazardous and Offensive Development Application Guidelines. o UNSW have engaged AECOM to review the dangerous goods (DG) to be stored within the MMEPD facility. DGs will only be stored on level 1 and 2 of Building J18, and will comprise of gas cylinders and flammable liquids. It is noted that there will be no consolidated chemical stores within the building. o The proposed storage of these goods are in minor quantities (less than 100L cupboards and cylinders contained in cylinder racks) and will comply with the requirements of the relevant Australian Standards and codes with respect to storage, handling and management regimes. o The Waste Management Plan provided with the EIS (Appendix I) included Campus-wide waste streams, responsibilities and management. The waste associated with the use of the Mechanical and Manufacturing Engineering Buildings will be consistent with this plan but is not inclusive of all waste streams listed on the plan.
Cooling Towers	o Suitable measures and health conditions must be imposed to control and potential Legionella outbreak of cooling towers and air conditioning.	o As part of the design development of this project, further investigation has been undertaken including a Cooling Tower Risk review, specifically considering Legionella. The report prepared by Clive Broadbent and Associates Pty Ltd (a leading microbial consultant) considered the location and design of the cooling towers will mitigate potential risks. This report can be provided if required. o Key to this issue being suitably considered is the height and clearance of the rooftop cooling towers. To improve the building's performance to avoid any potential outbreak of Legionella, the cooling towers have been raised, resulting in a slightly taller plant area. The chief reason for raising the cooling towers is to ensure the threshold distance from occupants of the building is attained, while at the same time ensuring superior air flow over the cooling towers.
Contamination	o The applicant contamination investigation recommends that the site is suitable for the proposed use. Should unexpected contamination be encountered, appropriate measures must be undertaken to address such finds in line with relevant and current unexpected finds protocol.	o Noted.
Asbestos	o Removal of asbestos is to be carried out in accordance with Council's asbestos Policy and the relevant requirements of WorkCover NSW and the NSW Department of Environment and Conservation.	o Noted.
Acid Sulphate Soils	o The EIS has not provided any advice on Acid Sulphate Soils therefore further supplementary information should be provided to advise on this issue.	o As outlined in the Geotechnical and Contamination Report submitted with the EIS (Appendix E), analysis of the soil indicated that the sample did not contain potential or actual acid sulphate soils. o Furthermore, the recently gazetted Randwick Local Environmental Plan 2012 does not include an Acid Sulphate Soils map for the site or Campus precinct, which would indicate that there is no risk of acid sulphate soils in this area of Randwick City Council.

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Drainage Comments	o Engineering calculations and plans with relevant reduced to AHD shall be submitted to and approved by the relevant certifying body prior to the commencement of construction works and must demonstrate compliance with stormwater strategy.	o Noted. o It is also noted that Council has requested the stormwater drainage system to be provided to cater for 1:20 ARI in- ground drainage. In the preceding paragraph, the submission requires stormwater to be managed in accordance with the Strategy prepared for UNSW by ANA Technical Services Pty Ltd. The UNSW Stormwater Strategy notes that the catchment of the MMEPD shall have all local piped building drained designed to 1:5 year ARI in-ground drainage. o UNSW has sought clarification from stormwater consultant (Robert Bird Group). On this matter it was concluded that the requirement for 1:20 ARI in-ground drainage should not apply to this development, given the UNSW Stormwater Strategy that governs the Campus. o We note also that no surface stormwater leaves the Campus as stormwater but is directed to and absorbed by the Botany Sands aquifer via the Village Green detention and filtration system.
Randwick Section 94A Development Contributions Plan 2012		
	o Council has identified that in accordance with the Section 94A development Contributions Plan, the subject development does not fall into any of the exempt categories and as such the relevant Section 94 levy must be paid to Council as part of any consent granted.	o Whilst the Department has not raised any concerns around the University's proposed exemption from the payment of section 94A contributions, Council has argued that the development should be subject to a full 1% levy, on the basis that it does not fall into any of the automatic exemption categories identified within the current section 94A plan. o Council's submission notes that they have provided substantial benefits in the form of capital infrastructure, and that the University's core business model is only made possible with the ongoing support of Council infrastructure and ongoing upgrading of this infrastructure. Council reiterates that the University will continue to place substantial pressure on Council's local infrastructure and so the imposition of section 94 contributions is appropriate and reasonable. The University maintains the view that there are several valid policy reasons why the Minister should not require contributions to be paid for this project under Council's Section 94A Development Contributions Plan 2012. o It is noted that the payment of any contribution on this development is discretionary, and that the approval authority, in this case the Minister for Planning and Infrastructure, while empowered to impose a condition requiring the payment of a monetary contribution is not required to under either the EP&A Act or Council's Contributions Plan. o Whilst developments by the Crown are not automatically exempt from payments under this section 94A Plan, development that in the opinion of Council does not increase the demand for the categories of public facilities and services addressed by the Plan should warrant a merit-based exemption. o Justification for the exemption of contributions include: 1. The University is a registered not for profit organisation; 2. The proposal does not result in any increased staff or student numbers and therefore does not generate any additional demand for services or infrastructure; 3. The University is an education facility and nominated charity; and 4. There has been a consistent approach adopted by the DPI for UNSW on previous applications of this nature.

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		Background – University as the Crown and Public Educational Institution
		o UNSW is recognised as the Crown by virtue of clause 226 of the Environmental Planning & Assessment Regulation, 2000.
		o Section 89 of the Environmental Planning & Assessment Act, 1979 (EP&A Act) provides that in relation to Crown applications, a consent authority is unable to impose a condition of consent without the approval of the University or the Minister. However, the University is conscious of its central position in the Randwick Local Government Area and its ongoing relationship with Council and the local community. The University also understands the need to continue to work cooperatively with Council to reach agreement on an appropriate balance of development conditions that meet Council's planning responsibilities, whilst also meeting the University's need to provide critical infrastructure.
		
		The Public Nature of the Proposed Development, and the Randwick City Council Development Contributions Plan 2012
		o The University and its functions are inherently of a public nature, providing educational and employment opportunities to the Randwick community and to the public at large. The proposed construction of a new research and teaching facility is part of the University's core academic functions.
		o The inherent public character of the University development is in contrast to a strictly commercial development where a full levy might be considered reasonable.
		o The underlying purpose of Council's Contributions Plan is to raise funds from private, commercially driven developments to be put towards the cost of public facilities and infrastructure which are burdened by those developments. Imposing a full levy on the University's own public infrastructure (and in doing so financially compromising the University's ability to perform its teaching and research functions) conflicts with the public policy of the Contributions Plan. Indeed, to do so would be simply diverting education-based funding away from the University for other unrelated purposes.
		o Whilst Council's Contributions Plan states that Crown Developments are not automatically excluded from the payment of section 94 contributions, however applicants are able to seek as exemption under Section 13.3 of the Plan. Under Section 13.3, in considering an exemption from the payment of section 94 contributions, Council is required to take into account:
		  o the extent to which the proposed development comprises or includes the provision, extension or augmentation of public amenities or public services that provide a public benefit, and/or
		  o whether the applicant is affected by any adverse financial circumstance which will impact on its ability to fund the payment of any levy which is imposed in accordance with this Plan.
		o An exemption is considered appropriate as the University is a not-for-profit public institution which relies on government grants, donations, and community funding to provide new facilities for both the University community, and the wider public at large. The levying of a development contribution would divert a portion of these public funds, which have been specifically provided for an educational purpose, to local services without any direct nexus to the impact on those services.
		o It is noted that the proposed development will not result in any additional students or staff on the Campus. As outlined in further detail below, the nature of the development, and its location within the Campus, means that many of the categories of infrastructure that Council is seeking to levy for are already provided by the University, for use by staff, students and the general public. On this basis, it is considered unnecessary that the development be levied for community facilities, public domain or new open space contributions.

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		o The University's position is supported by the provisions of Circular D6, as discussed below. Crown applications – Department of Planning Circular D6 o Again, it is noted that Council does not automatically grant exemptions to Crown Developments, however the Department of Planning's Circular D6 sets out the reasons why Crown developers should be able to seek exemptions from s.94 payments. o While the Department of Planning's Circular D6 "Crown Development Applications and Conditions of Consent" was formulated in 1995, it still remains the guiding document in relation to Crown applications and development contributions. The effect of this Circular is, that where the applicant is a Crown authority and the development is for Educational Services, no contributions should be collected for open space, community facilities, parking, and general local and main road upgrades. As the proposed development is integral to supporting the University's academic functions it is clearly part of the University's Educational Services. o Contributions may be levied for stormwater works, but as noted earlier the University caters for all stormwater run off on-site and will not further burden any Council-related infrastructure. Other Public Amenities Provided by the University on the Kensington Campus o The exemption from payment of contributions relating to community facilities, public domain and new open space is considered appropriate, as the University provides significant areas of accessible open space and recreation, as well as a range of community facilities. o The availability of these amenities and services on the Campus, which are maintained by the University, reduces the demand on public amenities outside the Campus. o Taking into account the significant public benefits which the proposed development, and the presence of the University generally, provides, and the minimal impact this development has on local infrastructure as it will not increase the population, it is clear that no development contributions should be levied against this development. o As stated in Circular D6: *Crown Activities providing a public service or facility lead to significant benefits for the public, in terms of essential community services and employment opportunities. Therefore, it is important that these essential community services are not delayed by unnecessary disputes over conditions of consent. These activities are not likely to require the provision of public services and amenities in the same way as developments undertaken with a commercial objective.* Consistent approach to UNSW o In the recent determination made by the DPI for the Tyree Energy Technologies Building (MP 09_0163), a rational approach has been adopted with regard to contributions. o In consideration of that application, the DPI considered that given the University is a not for profit organisation the principle of reasonableness should be adopted in the calculation of contributions with the levy relating only to the increase demand on public services and infrastructure. o Given that for the current application for the Mechanical and Manufacturing Engineering Buildings J17 and J18 there is no increase in staff or student numbers and the development relates more to an upgrade of facilities and use of space within the buildings, no additional demand for services is generated and therefore no development contributions should be levied.

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Sydney Water Corporation		
	Due to the type and scale of development proposed, the proponent will be required to obtain a Section 73 Certificate under the Sydney Water Act 1994.	o Noted, and will be obtained prior to a Crown Certificate being issued. o We note that the development has been required to comply with the UNSW Stormwater Strategy with regard to design of piped building drainage.
Sydney Airports Corporation Limited (SACL)		
	o Authorisation of the Civil Aviation Safety Authority (CASA) has been provided with no objection to the erection of the proposed structure to a maximum height of 62.387 metres above Australia Height Datum (AHD). o The height of the prescribed airspace at the site is 65.0 metres above Australian Height Datum in accordance with the relevant regulations	o The proposal will be within the prescribed airspace height of 65.0 metres AHD in accordance with the relevant legislation and submission from SACL. o Renewed verbal and emailed contact has been made with SACL to advise of the increased rooftop plant height to a maximum of 63.88 AHD. SACL has confirmed that the new height is still within the terms of its original approval letter (but will seek to reissue this letter as a revised approval ASAP for clarity). o SACL advised that no new issues are raised by the height change.
	o Should the height of any temporary structure and/or equipment be greater than 50 feet (15.24m) above existing ground height (AEGH), a new approval must be sought in accordance with the Civil aviation (Building Control) regulations Statutory Rules 1988 No. 161. o Operation of construction equipment should be obtained prior to any commitment to construct.	o Noted. o A separate application and for temporary crane operation will be submitted to SACL and approval obtained as required.