



28 November 2013

Mr Chris Ritchie
A/ Director - Industry, Social Projects and Key Sites
Development Assessment Systems and Key Sites
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Our Ref: 2013/341073

Attention: Mr Peter McManus

Dear Mr Ritchie

Re: Submission on the Stage 1 EIS for the Northern Beaches Hospital (SSI 5982)

I refer to your letter dated 29 October 2013, which advised of the exhibition of the Stage 1 Environmental Impact Statement (EIS) for the State Significant Infrastructure – Northern Beaches Hospital project. Council staff have undertaken a review of the relevant documentation and Council's submission is attached for your consideration.

In addition to the comments contained within the attached submission, Council would like to reiterate its disappointment that Warringah Council has not been included as a member of the Inter Departmental Committee (IDC) which was established to oversee this important infrastructure project. The development of the Northern Beaches Hospital is a significant regional infrastructure project located within the Warringah Local Government Area and it is important that Council is involved in all aspects of its planning and development.

If there are any questions or you need clarification on any issues, please contact Phil Jemison, Principal Planner on (02) 9942 2170.

Yours faithfully

Malcolm Ryan
Deputy General Manager Environment



Council Submission

Stage 1 Environmental Impact Assessment State Significant Infrastructure – Northern Beaches Hospital (SSI 5982)



27 November 2013

Introduction

This document is Warringah Council's submission in response to the exhibition of the Stage 1 - Environmental Impact Assessment (EIS) for the State Significant Infrastructure (SSI) application for the proposed Northern Beaches Hospital.

Stage 1 includes the concept design for the hospital, as well as details of proposed site clearance and preparatory works.

This will include the closure of Bantry Bay Road, installation of construction fencing and a site office. The main impact of these preparatory works will be the general clearance of vegetation on the site. Some vegetation is being retained on the former Blinking Light Reserve, however with the understorey will be thinned for bushfire management.

Once vegetation is removed there will be the associated disposal of vegetation and green waste along with the removal of other waste, which will consist mainly of building waste from the former buildings on the site. Site stabilisation will also be implemented.

Stage 2 will involve the actual construction, commissioning and operation of the hospital, however the EIS for this Stage will not be available until later in 2014.

The applicant is Health Infrastructure. While site clearance and preparatory works are planned to occur in early 2014, construction of the hospital itself is anticipated to start in early 2015 and be completed by 2018.

The proposal is designated as State Significant Infrastructure (SSI) and therefore is subject to assessment under Part 5.1 of the Environmental Planning and Assessment Act, 1979. As a result, the Minister for Planning and Infrastructure is the approval authority for this SSI, not Council.

Council's comments have been structured to largely follow the issues outlined in the specialist reports (Appendices C – P of the EIS).

Specific Comments

1. General Concept

The Northern Beaches Hospital is a significant infrastructure project located within the Warringah Local Government Area (LGA). Given the significance of the project, Council would like to see design excellence built into all aspects of the built forms, with a real emphasis on a high standard of articulation of building bulk, architectural expression, high quality finishes and landscaping consistent with a large public infrastructure development in a bushland setting.

It is noted that the key features of concept proposal are:

- Min setbacks of 6 metres from all site boundaries;
- Building mass of 6 to 10 storeys (including lower ground floor);

- Massing of 2 storeys on approach and entrance on Frenchs Forest Road West;
- Massing of 3 storeys at southern end of site on Warringah Road;
- Approx. gross floor area of 70,000 sq m;
- Primary access from Frenchs Forest Road West;
- Secondary access from Warringah Road;
- Helipad in top of main building;
- Partial retention of vegetation at eastern end of site; and a public walkway at western end next to high school to facilitate pedestrian movement from Frenchs Forest Road through to Warringah Road.

It is not possible to fully assess the hospital concept until Stage 2, when a more detailed design will be available. Council reserves the right to comment in more detail on the concept proposal when operator, design and construction details are available.

However, in relation to the Stage 1 Concept, the following concerns are raised:

Primary access from Frenchs Forest Road West

As outlined in our transport comments, Council has significant concerns about the primary access being from Frenchs Forest Road, with Warringah Road only being used as secondary access. This will result in significant additional traffic being generated onto the local road network, including Frenchs Forest Road West, Frenchs Forest Road East, Allambie Road as well as the local roads which connect the hospital site to Forest Way.

Public Transport Access

Very little information is provided in relation to future public transport improvements to service the hospital (during construction and operation). Details of traffic and transport improvements should be clearly outlined as part of the concept proposal. Council is concerned that this information will not be available until the release of the Stage 2 EIS, after the site clearance and preparatory works have already been undertaken.

Building Form and Massing

The concept of setting back the building, particularly from Frenchs Forest Road West is agreed with as this reduces the building bulk and massing on that part of the site immediately adjoining existing low density residential development. It is agreed that concentrating the hospital facility into a 6 – 10 storey building may be an appropriate response, as this could result in a more efficient facility, with acceptable and appropriate setbacks and additional on-site open space and pedestrian linkages.

However, in discussing the built form design, the EIS refers to proposed height limits for surrounding development, from the Cox Richardson (2010) State Significant Site (SSS) Study, which proposed a height limit of 4 storeys (13 metres) for medium density residential development to the north, south and west of the site.

These comments in the EIS are misleading and based on a redundant study for a previous State Significant Site proposal, which was abandoned in December 2011.

The residential land in the vicinity of the hospital site is currently not zoned for medium density housing and does not have a 13 metre height limit. The EIS (page 44) states that "...buildings at the site's perimeter should be in scale with proposed medium density residential height limit of 13 metres". This statement is incorrect and should be deleted from

the EIS along with any other discussion based on relating the concept plan to the recommendations of the Cox Richardson SSS Study.

The concept plan should recognise that it will be located opposite existing low density residential development and the scale and massing should take this into account.

The concept plan for the Hospital should not pre-empt Council's Hospital Precinct Structure Plan, which is proposed to be initiated in the near future and will be looking at the broader land use issues and opportunities in the area surrounding the hospital.

Overshadowing

The shadow diagram provided on Page 46 of the NBH Stage 1 EIS is rudimentary in that it does not provide sufficient detail of the impact of the hospital upon surrounding public and private properties.

In this regard, Council recommends that any application is to be accompanied by a detailed Shadow and Sunlight Access Report (which includes elevational shadows) addressing the requirements of part 'D6 Access to Sunlight' in Warringah Development Control Plan 2011.

View Sharing and Visual Impact

As mentioned earlier, Council notes the commentary provided on page 46 of the NBH Stage 1 EIS and notes that the proposed hospital will be up to 10 storeys in height and will be constructed on the highest point in Frenchs Forest.

As this will be the tallest and most visually prominent building in the LGA east of the Dee Why Town Centre, a comprehensive View Analysis should be prepared and submitted with any further application.

The Analysis should comprehensively account for impacts upon views from both public and private properties.

The visual impact of the hospital from surrounding public and private properties is to be carefully considered in a Visual Impact Study with regards to the architectural design of the building.

Visual and Acoustic Privacy

With regards to visual privacy, it is recommended that appropriate measures be taken in the design of the building(s) to minimise any potential overlooking onto the neighbouring residential properties to the north and south. Reliance should not be made upon the existing vegetation on those neighbouring residential properties to provide privacy.

With regards to acoustic privacy, this matter is raised under the commentary to Appendix P with regards to helicopter noise. In addition, the Acoustic Report is to detail impacts upon neighbouring residential properties with regards to all other noise impacts associated with the operation of the hospital.

2. Transport and Access (Appendix C)

The Traffic and Transport Impact Assessment (TTIA) is a preliminary assessment of traffic issues associated with the new hospital and deals with the impact of the Stage 1 works being the clearing works to prepare the site for Stage 2 works, which would involve the excavation and building works.

The TTIA identifies that there are many shortcomings and major deficiencies in the road network. It does not identify any required road infrastructure works, which are to be part of the Stage 2 works. It does indicate that the deficiencies in road/intersection capacities at the critical road intersections have been identified by the Roads and Maritime Services who are investigating supporting road network solutions.

There is no information provided on truck access routes on the road network nor the volume of such movements. However due to the peak hour traffic congestion the TTIA recommends that major deliveries removals be undertaken outside of the peak hours during 11 am - 2pm and school holidays.

Council recommends that the truck traffic should be via the main road network and not Frenchs Forest Road West, particularly during the bulk excavation works in Stage 2, which will require significant truck movements.

Council is concerned that the main access to the hospital is proposed via Frenchs Forest Road West, particularly in the absence of any road infrastructure improvements. It appears that due to the lower traffic flows between Frenchs Forest Road West and Warringah Road it has been chosen to carry the bulk of the hospital traffic. Traffic exiting the site will still need to negotiate the badly congested intersections of Warringah Road with Wakehurst Parkway and Forest Way.

Council's previous suggestion that the main entry to the site utilise the existing traffic lights at Warringah Road and Hilmer Street has not been taken. Frenchs Forest Road West should form the secondary access to the hospital. If Frenchs Forest Road West remains the main access to the Hospital site, there will be significant traffic increases on the Council roads Frenchs Forest Roads West and East, as well as Allambie Road. Making provision for increased traffic on these roads will require a detailed traffic impact assessment and identification of road and intersection improvements, along with consultation with the local community whom for many years have been subject to increased traffic flow through the residential areas as a result of the congested intersections highlighted above.

Any traffic management proposal needs to take into account the pick-up and set down requirements of the adjacent Forest High School. It could be expected that the proposed parking provision discussed in the TTIA will result in hospital staff and visitor parking on street which will have a subsequent impact on the current school pick up and set down requirements.

In relation to other transport infrastructure such as public transport and bicycles, very little information is provided. A transport planner should review and comment on the provisions for transport such as cars, public transport and bicycles.

There is a lack of detail about facilities that will support the use of transport modes other than cars. Excellent facilities that support public transport and bike usage must be provided.

3. Biodiversity Offset Strategy (Appendix D) and Bushfire Constraints Assessment (Appendix E)

Given the sensitivity of the site, and the scale of the development, it is considered appropriate to assume the hierarchy of avoid, mitigate and offset to manage the impact of the development on biodiversity. For this reason, recommendations are grouped under these three tiers.

Avoidance

Issue - The EIS reports are considered inconsistent in relation to statements that vegetation in Blinking Light Reserve will largely be retained, with the exception of thinning of understorey vegetation (Biodiversity Offset Strategy, SMEC, 2011). This appears to be inconsistent with the Bushfire Constraints Advice (EcoLogical Australia, 2011) which suggests that APZs between 70 and 100m will be required.

It is likely that the retained vegetation in Blinking Light Reserve would need to be thinned so as to be consistent with an 'Inner Protection Zone' that is associated with special fire protection purposes. This would require substantial modification of any vegetation to be retained on the site including the canopy, and is thus inconsistent with the Biodiversity Offset Strategy.

Recommendation – amend reports to ensure consistency between the reports. Impacts should then be mitigated and offset accordingly.

Mitigation

Issue – Council has not received any operational documents (e.g. Biodiversity Management Plan, Vegetation Management Plan or Works Environment Protection Plan) to manage the mitigation measures associated with the development. This includes consideration of works to be undertaken before, during and after the clearing. It is currently unclear what works will be undertaken.

Recommendation – A range of mitigation measures are provided in the Biodiversity Specialist Report (SMEC) submitted with the application. These measures should be outlined in detail in an operational management plan (BMP, VMP or similar), outlining the mechanisms and timing of these measures to ensure they are implemented.

Council recommends the implementation of the following mitigation measures which are broadly consistent with recommendations included in the Biodiversity Specialist Report (SMEC 2013):

- Staged clearing, fauna relocation and establishment of exclusion zones consistent with NSW industry guidelines applied to large scale clearing such as Biodiversity Guidelines, Protection and Managing Biodiversity on RTA Projects (RTA 2011);
- Soil seed bank translocation, including the preparation of a soil seed bank translocation plan. Council can provide a list of suitable recipient sites;

- Implementation of fauna crossings – including enhanced culverts as underpasses, rope bridges, overpasses etc;
- Weed management schedules – before, during and after the works;
- Planting schedules;
- Use of a Project Ecologist to assist in the implementation of the VMP including soil and fauna translocation, certification of weed management works, implementation of crossings. The Project Ecologist should be suitably qualified;
- Salvage and collection of plants, seeds and propagation materials – for use in landscaping and by community and local nurseries;
- Bushland protection fencing – around areas of vegetation to be retained;
- Tree protection mechanisms;
- Installation of nest boxes;
- Hygiene protocols for equipment and plant – to reduce the risk of spreading weeds and pathogens.

Offsetting

The project is recognised as State Significant Infrastructure, and as such offsetting strategies have been developed in accordance with the NSW OEH Interim Policy on Assessing and offsetting biodiversity impacts for Part 3A, State Significant Infrastructure and State Significant Development (NSW Interim Offset Policy)

Issue: The Biobanking credit calculations have not accounted for the modification of the Duffys Forest Endangered Ecological Community within Blinking Light Reserve. This area has been omitted from the Biobanking Assessment Report 2013 (James, 2013). As stated above, this vegetation will be substantially impacted by proposed bushfire protection activities.

Recommendation: Offset requirements should be based on the full quantum for vegetation to be impacted.

Issue: The offset strategy proposes to retire all credits from 'Agreement 55'. The ecosystem credits are insufficient to meet the full requirement, and thus this is considered to be 'Tier 3 pathway' (NSW Interim Offset Policy). The offset strategy attempts to validate this pathway on the basis that the credits required are not available. Council can provide a list of sites which may be suitable for the creation and retirement of a suitable number and type of ecosystem credits.

Recommendation: Council to provide Health Infrastructure with a list of additional sites which may yield credits. Additional credits not provided by Agreement 55 should be found and retired to offset the impacts of this development. If there is a risk that would delay the development, the NSW Interim Offset Policy allows for the conversion of credits to a

monetary fee. This fee could then be used to offset the impacts of the development once an appropriate site/s has been identified. It is recommended that this approach be pursued. Additionally, financial contributions could similarly be used by local land managers to implement priority actions for the Duffys Forest EEC.

Issue – The offset pathway proposes to vary the species credit requirements such that Red-crowned Toadlet and Rosenberg's Goanna credits are retired in lieu of available Powerful Owl credits. Varying species credits in this manner is only permissible when the credits to be retired are of a species considered to be a higher conservation priority. Based on the extent of known local populations for both the Red-Crowned Toadlet and Rosenberg's Goanna, Council ecologists consider that these species are not of a higher conservation priority than the Powerful Owl. The trading of credits to species of higher conservation status is therefore not addressed by the proposed offset.

Recommendation – Council to provide Health Infrastructure with a range of sites where additional Powerful Owl Credits could potentially be established and subsequently retired. If these credits cannot be retired before the development proceeds, it is recommended that a monetary fee, based on the credits required converted to hectares, should be considered. This could be used to secure appropriate offsets or by local land managers to implement priority actions for this species.

4. Aboriginal Heritage (Appendix F)

This report appears to comprehensively assess the potential for Aboriginal sites within the study area. It is noted that no sites were identified, however that there may be potential for art/engravings on the sandstone outcrops which exist on the north-east portion of the study area. These sandstone outcrops are currently obscured by vegetation, so the Recommendation within this Aboriginal Heritage report should be adhered to during construction.

It is noted that this Aboriginal Heritage Report also examines a site on Aquatic Drive which is owned by Health Infrastructure, but which is not part of the State Significant Site for the new hospital. It should be clarified as to the purpose of including this site in this Stage 1 EIS for the Northern Beaches Hospital. It is mentioned that it is under investigation as an offset area for the Duffys Forest Endangered Ecological Community, to mitigate biodiversity impacts on the hospital site.

5. Historic Heritage (Appendix G)

This report correctly describes the historic context for the Hospital site and the surrounding area. It identifies that there is one listed heritage item in the vicinity, being the remnant fruit trees from Holland's Orchard, adjacent to Warringah Road.

These trees were originally thought to be apple trees however Council's recent Community Based Heritage Study Review has confirmed that they are actually pear trees. Also, as part of this Review, Council has resolved to extend this heritage listing to include a grove of pear trees on the Forest High School site, which were propagated from the original pear trees adjacent to Warringah Road. This proposed listing amendment is part of a current Heritage Planning Proposal which is awaiting legal drafting before being made in early 2014. The

Historic Heritage Report should recognise this change in extent of the local heritage item in the vicinity.

It is noted that there may be the potential for archaeological relics to be found in those areas of the site which were previously developed. The recommendations within this Report for an Archaeological Management Strategy (AMS) are agreed to and this AMS should be adhered to during any construction phases.

As with the Aboriginal Heritage Report, this report also examines a site on Aquatic Drive which is owned by Health Infrastructure, but which is not part of the State Significant Site for the new hospital. It should be clarified as to the purpose of including this site in this Stage 1 EIS for the Northern Beaches Hospital.

6. Contamination Assessment (Appendix H)

Council staff have undertaken a review of the Phase 1 Contamination Assessment Report, prepared by Douglas Partners, and raises no objection to the contents and the findings of the Report.

7. Stormwater Management Strategy and Plan (Appendix I)

Issue - As detailed in the Stormwater Management Strategy and Plan prepared by ARUP, the development must comply with the water quality requirements of the Northern Beaches Stormwater Management Plan as a minimum. Council strongly supports the reuse of stormwater for non-potable use in addition to the provision of functional and integrated landscapes that provide water quality, microclimate and aesthetic benefits.

Recommendation - Council requests the submission of a MUSIC model prepared in accordance with either the Sydney Metropolitan Catchment Authority guidelines or the more recent Sydney Catchment Authority guidelines with site specific data used if available. 6 minute rainfall data sourced from the Sydney Observatory Hill rainfall station (066062) is the recommended gauge with the period from 1 January 1963 – 31 December 1993 as it is representative of typical rainfall conditions for average annual rainfall and number of rain days. All data files must be supplied to Council with the report.

8. Infrastructure Management Plan (Appendix J)

The Infrastructure Management Plan refers to the supply of utility services to the hospital. Any new services and service amplifications shall be located within public roads in accordance with the corridor allocations outlined in the Streets Opening Conference. New services shall avoid being located within the carriageway of Council's local roads.

The plan might be considered deficient in that it does not address the provision of new infrastructure to support access to the hospital, additional street lighting requirements, etc.

9. Noise Assessment (Appendix K)

The Acoustic Assessment Report (dated 29/07/2013) as prepared by Acoustic Logic (under addresses noise generated by equipment used in the clearing of the vegetation from the site during construction works.

Whilst Council does not raise any objection to the contents of the Acoustic Report, it is requested that a detailed Environmental Noise Impact Assessment addressing the relevant requirements of Clause 102 State Environmental Planning Policy (Infrastructure) 2007, and other applicable legislative requirements, be prepared and submitted to Council for review as part of the Stage 2 EIS process.

10. Soil and Wastewater Management (Appendix L)

Riparian

Issue: The concept Soil and Water Management Plan (Appendix L) prepared by SMEC Australia dated September 2013 is generally in accordance with the Director General's Environmental Assessment Requirements with the following exceptions:

- Page 6, Table 1 "Impact sources, pathways and receivers" of the SWMP does acknowledge formal and informal pathways that include Middle Creek, Middle Harbour (Narrabeen Lagoon). However it has omitted Curl Curl Creek (upper reaches of Manly Dam, flowing to Manly Lagoon). See Figure 2 "Catchments and flow direction".
- It states that sediment control elements are to be inspected "regularly", however the time frame is not included. The Plan does mention inspections after significant rainfall events but does not state what significant rain fall levels are. Further clarification on these parameters is requested.
- Section 3.2, page 8, 3rd dot point of the concept SWMP states "Preliminary catchment calculations provided soil loss figures ranging from 78-194t/ha/year". The consultant states that this range is below the best management practice identified as trigger criterion of less than 200 tonnes per year, and as such, provision of a sediment basin can be considered unnecessary, and alternate measures may be employed to protect receiving waters.
- This should be confirmed and the alternate methods should be identified in the concept of detailed SWMP. The Managing Urban Stormwater document states 150 tonnes per year however this was written in 2004, and may not be accurate according to current practice. Further clarification should be sort and amendments made to the concept SWMP if required.
- A plan outlining the conceptual hospital building foot print including ancillary buildings should be included in the conceptual Soil and Water Management Plan.

Recommendation: That the site superintendent keep a site logbook (following the criteria below), making entries at least weekly, including immediately before forecast rain and after rainfall as a part of the statutory "diligence and care" responsibilities.

Entries should include:

- the volume and intensity of any rainfall events;
- the condition of any soil and water management works;
- the condition of vegetation and any need to irrigate;
- the need for dust prevention strategies; and
- any remedial works to be undertaken.

The logbook should be kept on-site and made available to any authorised person (including Council) on request. It should be given to the project manager at the conclusion of works.

A detailed Soil and Water Management Plan (SWMP) should be provided prior to commencement of work including the following:

The SWMP must meet the requirements outlined in the Landcom publication Managing Urban Stormwater: Soils and Construction - Volume 1, 4th Edition (2004) as well as Warringah Council requirements. This SWMP must include the following as a minimum:

- Site boundaries and contours;
- Vehicle access points, proposed roads and other impervious areas (e.g. parking areas and site facilities);
- Location of all drains, pits, downpipes and waterways on and nearby the site;
- Planned stages of excavation, site disturbance and building;
- Stormwater management and discharge points;
- Integration with onsite detention/infiltration;
- Sediment control basin locations and volume (if proposed);
- Proposed erosion and sediment controls and their locations;
- Location of wash down and stockpile areas including covering materials and methods;
- Vegetation management including removal and revegetation;
- A schedule and programme of the sequence of the sediment and erosion control works or devices to be installed and maintained.
- Inspection and maintenance program;
- North point and scale.

All site drainage, as well as sediment and erosion control works and measures as described in the SWMP, and any other pollution controls as required by these conditions, should be implemented prior to commencement of any other works at the site.

Please find below a comparison of Director General Requirements/Managing Urban Stormwater – Soils and Construction 4th Edition with SMEC Concept Soil and Water Management Plan that outlines the identified issues, and the further clarification that is sought.

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Director General Requirements	Warringah Council Requirements and Managing Urban Stormwater – Soils and Construction 4 th Edition	Soil and Water Management Plan Appendix L – information supplied by SMEC
Prepare a Soil and Water Management Plan that details measures and procedures to minimise and manage the generation and off-site transmission of sediment, dust and fine particles.	A Soil and Water Management Plan (SWMP) shall be prepared by an appropriately qualified person and implemented onsite prior to commencement. The SWMP must meet the requirements outlined in the Landcom publication <i>Managing Urban Stormwater: Soils and Construction - Volume 1, 4th Edition (2004)</i> . The SWMP must include the following as a minimum:-	
	• Site boundaries and contours;	Provided see Figure 2, "Catchments and flow direction".
	• Vehicle access points, proposed roads and other impervious areas (e.g. parking areas and site facilities)	Should be included in the detailed SWMP prior to commencement of work.
	• Location of all drains, pits, downpipes and waterways on and nearby the site;	The location of all drains, pits and downpipes to be provided prior to commencement of works.
	• Planned stages of excavation, site disturbance and building;	Provided in Item 2.1. A concept plan of the building footprint should be included in the final SWMP.
	• Stormwater management	Stormwater

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Director General Requirements	Warringah Council Requirements and Managing Urban Stormwater – Soils and Construction 4 th Edition	Soil and Water Management Plan Appendix L – information supplied by SMEC
	and discharge points;	Management Plan including discharge points should be incorporated into the final SWMP prior to commencement of works.
	Integration with onsite detention/infiltration;	Should be included in the detailed SWMP prior to commencement of works.
	Sediment control basin locations and volume (if proposed);	Section 3.2, page 8, 3rd dot point of SWMP states "Preliminary catchment calculations provided soil loss figures ranging from 78-194t/ha/year. This range is below the beset management practice identified as trigger criterion of less than 200 tonnes per year. As such, provision of a sediment basin can be considered unnecessary, and alternate measures may be employed to protect receiving waters". This needs to be confirmed and the alternate methods need to be identified in the detailed SWMP
	Proposed erosion and	Not supplied - This has

Council Submission – Stage 1 Environmental Impact Assessment – Northern Beaches Hospital

Director General Requirements	Warringah Council Requirements and Managing Urban Stormwater – Soils and Construction 4 th Edition	Soil and Water Management Plan Appendix L – information supplied by SMEC
	sediment controls and their locations;	been allocated to the Managing Contractor and should be supplied in the detailed SWMP prior to commencement of works.
	Location of wash down and stockpile areas including covering materials and methods;	Location of wash down and stockpile areas not supplied. The SWMP Section 4.2 Erosion Control, page 11, 4 th dot point states “progressively spread chipped vegetation to provide soil stability on bare areas as soon as practicable following completion of vegetation clearing”.
	Vegetation management including removal and revegetation;	Not supplied. A site map indicating the area to be cleared and the location of “Blinking Light Reserve” should be included in the SWMP.
	A schedule and programme of the sequence of the sediment and erosion control works or devices to be installed and maintained.	To be included in the detailed SWMP as applicable due to stage of works.
	Inspection and maintenance program;	Sediment control elements to be inspected regularly – time frame not included. Does mention after significant rainfall events but does not

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Director General Requirements	Warringah Council Requirements and Managing Urban Stormwater – Soils and Construction 4 th Edition	Soil and Water Management Plan Appendix L – information supplied by SMEC
		state what significant rain fall is.
	Site Constraints and Characteristics	Table 2, page 7 of the SWMP is in accordance with Managing Urban Stormwater – Soils and Construction 4 th Edition.
	Waste Management	A separate Waste Management Strategy will be developed and will outline chipping of cleared vegetation on site and use as a mulching agent.
	Pollution Control	An overview is given in Table 1 “Impact sources, pathways and receivers. Further detail to be included in the detailed SWMP
	Work Schedule	A general overview is given.
	Limitation to Access/Land Disturbance	Table 3 page 8 outlines the land use and limitation of the access areas, truck cleaning area and undisturbed areas (flora and fauna management) should include construction areas that will occur clearing and preparatory works.
	North point and scale. All Site drainage and sediment and erosion control works and measures as described in	Required prior to commencement of works.

Director General Requirements	Warringah Council Requirements and Managing Urban Stormwater – Soils and Construction 4 th Edition	Soil and Water Management Plan Appendix L – information supplied by SMEC
	the SWMP, and any other pollution controls, as required by these conditions, shall be implemented prior to commencement of any other works at the Site.	

11. Groundwater Factual Report (Appendix M)

With regards to the Groundwater Factual Report prepared by SMEC, Council concurs with the recommendations of the report to undertake additional groundwater assessments. This should be undertaken when further design details are known such as excavation requirements (underground car parking etc.).

Council will require any groundwater discharge to the stormwater network be carefully managed in order to meet the requirements of the Northern Beaches Stormwater Management Plan, in addition to a pH of between 6.5-8.5, to ensure the downstream environment is protected.

12. Waste Management Strategy (Appendix N)

More clarity is required on where waste is planned to be recycled and disposed of. For example, the green waste management option under section 3.1, states 'Disposal to landfill, least attractive management strategy' – this doesn't mean anything.

More in-depth investigation on facilities that will recycle the waste (green waste and concrete) mentioned is required. Green waste and concrete can be recycled and does not necessarily need to be disposed at landfill as alluded to in the plan.

13. Preliminary Construction Management Plan (Appendix O)

Construction traffic will be required to avoid using Frenchs Forest Road West to the west of the site and other local streets. Frenchs Forest Road West is in poor condition and is unlikely to support heavy construction traffic volumes. All traffic should be directed to Warringah Road or Wakehurst Parkway. This could be achieved by utilising the lights at the intersection of Warringah Road and Hilmer Street as previously noted.

Pedestrian access to and around the site shall be maintained. Safety of children and accessibility for the mobility impaired is paramount. The condition of the existing footpath network shall be maintained in good condition.

Construction traffic shall avoid the use of Frenchs Forest Road during school finish times.

14. Aviation Airspace Assessment (Appendix P)

With regards to potential noise impacts upon the hospital through commercial passenger aircraft flight paths, Council notes the findings of Rehbein Airport Consulting in their report 'Northern Beaches Hospital Prescribed Airspace Assessment' dated 12 July 2012 and does not raise any specific concerns.

In terms of the potential noise impacts associated with the emergency helicopter flight paths, Council has undertaken a review of the findings contained within the Rehbein Report (Northern Beaches Hospital Feasibility Study - dated 6 December 2012) and has identified that the Report only addresses the potential noise impacts upon the hospital and does not account for any noise impacts upon surrounding residential areas.

It is recommended that an amended Acoustic Report be prepared and submitted with any further application which accurately details possible flight paths at various times (within a 24 hours range) and its potential impact upon the surrounding residential areas. The report should also detail how any noise impacts from helicopter operations upon the surrounding residential area will be minimised or mitigated.

