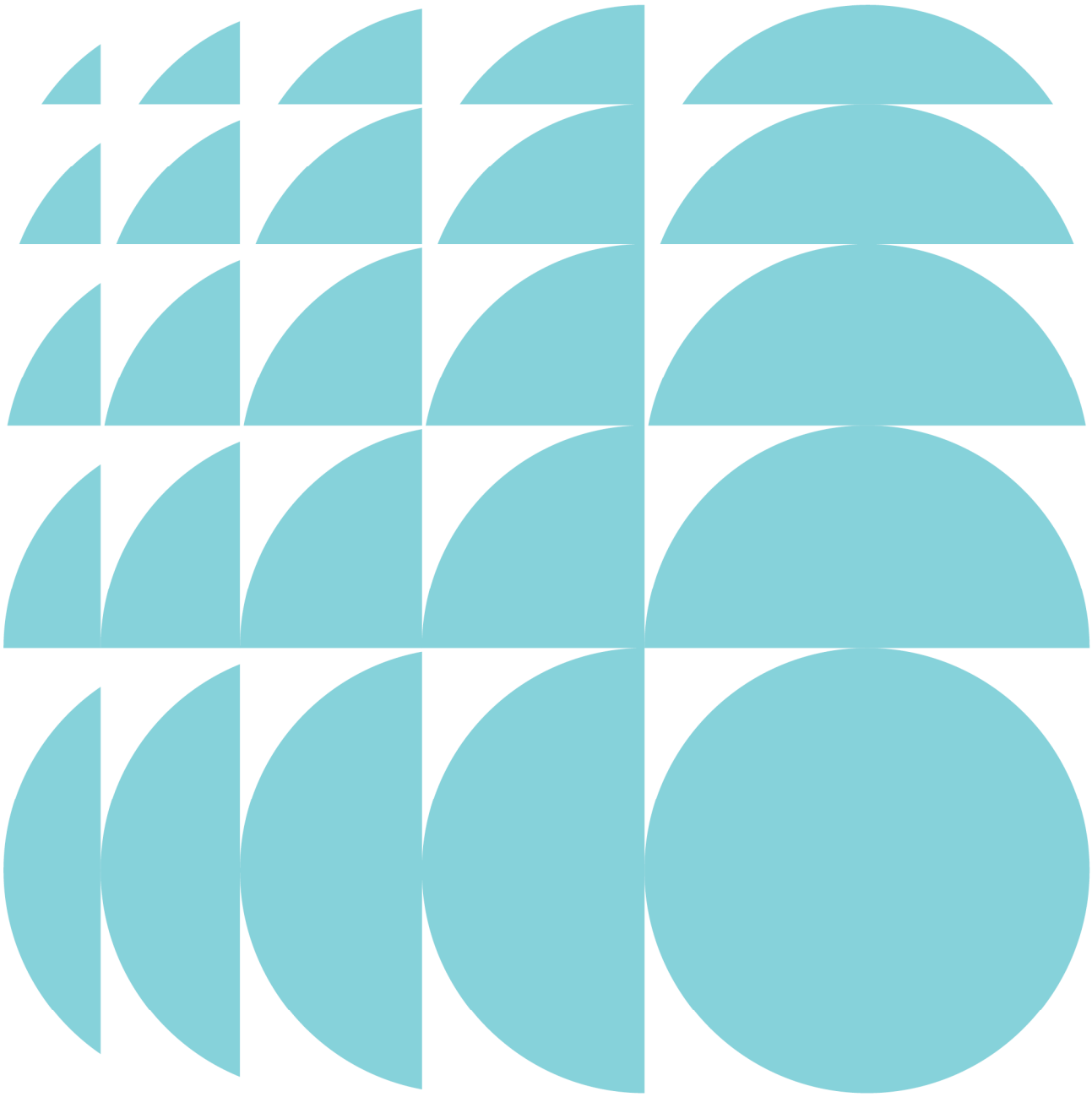
ETHOS URBAN

Preferred Infrastructure Report
New Maitland Hospital – Stage 2 Main Works
Metford Road, Metford

Submitted to the Department of Planning, Industry and Environment

On behalf of Health Infrastructure NSW

30 September 2019 | 218684



CONTACT

Chris McGillick Principal cmcgillick@ethosurban.com 9956 6962

This document has been prepared by:

Chris McGillick 30 September 2019

This document has been reviewed by:

Gordon Kirkby 30 September 2019

Ethos Urban Pty Ltd
ABN 13 615 087 931.
www.ethosurban.com
173 Sussex Street, Sydney
NSW 2000 t 61 2 9956 6952

Contents

Figures

Tables

Appendices

Contents

1.0 Introduction

An Environmental Impact Statement (EIS) in support of the State Significant Infrastructure Application for the construction and operation of the New Maitland Hospital (NMH) was publicly exhibited for a period of 28 days inclusive between 12 July 2019 and 8 August 2019 (SSI-9775).

In total, 13 submissions were received from Government agencies and authorities in response to the public exhibition of the EIS. Four (4) submissions were received from the general public.

The Department of Planning, Industry and Environment (the Department) has also prepared a letter setting out additional information or clarification required prior to final assessment of the project. The proponent Health Infrastructure NSW (Health Infrastructure) and its specialist consultant team have reviewed and considered all issues raised.

This report, prepared by Ethos Urban on behalf of the proponent, sets out the responses to the issues raised in accordance with Clause 85A of the *Environmental Planning and Assessment Regulation 2000* (EP&A Reg), and details the final project design for which approval is now sought. The final project design includes amendments made by Health Infrastructure pursuant to Clause 55 of the EP&A Reg, including changes to address matters raised in the submissions.

The report provides a detailed response to all of the key issues raised by the various government agencies. The key issues raised in the submissions can be broadly grouped into the following categories:

- Traffic;
- Contamination;
- Biodiversity methodology; and
- Industrial Heritage.

This report provides a response to each of the above issues and outlines the proposed amendments to the exhibited Environmental Impact Statement. Where individual issues are not discussed in this report, a detailed response can be found in the response tables at **Appendix A**.

2.0 Background

East Maitland Catalyst Area Steering Group

The Hunter and Central Coast Development Corporation (HCCDC) has established the East Maitland Catalyst Area Steering Group. This Steering Group has been established to support the work of Maitland City Council (MCC) and key NSW Government agencies in achieving the vision and outcomes of the East Maitland Catalyst Area in accordance with the Hunter Regional Plan 2036 and Greater Newcastle Metropolitan Plan 2036.

The Steering Group was convened in September 2019 and includes representatives from;

- Health Infrastructure;
- Maitland City Council;
- Department of Planning, Industry and Environment; and
- Transport for NSW (including former RMS).

The Catalyst Area program will identify the need to plan for, fund and deliver the infrastructure needed to support growth of new homes and jobs in the area.

3.0 Amendments to Proposed Development

To reflect the design changes that have been made to the proposed development following public exhibition of the proposal and for which approval is now sought, and to address issues raised in the submissions, a range of updated plans and documentation have been prepared.

The following consultant reports and supporting information has been updated or further supplements the material originally submitted in support of the EIS (refer to Table of Contents):

- Amended Architectural Drawings prepared by BVN;
- Summary of Design Changes prepared by CBRE;
- Amended Landscape Plans prepared by Black Beetle;
- Amended Traffic Impact Assessment prepared by GTA Traffic Consultants;
- Revised Biodiversity Development Assessment Report prepared by Sclerophyll;
- Site Investigation Report prepared by GHD;
- Remediation Action Plan prepared by GHD;
- Interim Site Audit Advice prepared by JBS&G;
- Addendum Noise and Vibration Assessment prepared by Acoustic Logic;
- Addendum Wind Assessment prepare by Windtech;
- Addendum Aviation Report prepared by Avi Pro;
- Amended Arborist Report prepared by Tattersall Lander;
- Site Water Balance report prepared by GHD;
- Stormwater Detention and Discharge Strategy prepare by TTW; and
- Helipad Structural Statement prepared by TTW.

The revised supporting documentation enables the Department to undertake an informed assessment of the amended proposal. The findings of the revised supporting consultant documentation are summarised at Section 3.0 and 5.0 of this report as relevant, with additional findings reported by the consultant team submissions and within the response table at **Appendix A**. This report should be read in conjunction with the EIS prepared by Ethos Urban, dated June 2019, as relevant.

4.0 Key Issues and Response

This section of the report provides a detailed response to the following key issues raised by the Department and government agencies and authorities and the general public during the public exhibition of the SSI DA:

- Traffic;
- Contamination; and
- Biodiversity assessment;
- Industrial heritage.

A response to each of the other individual issues raised by the Department and submitters is provided in the response table at **Appendix A**.

4.1 Traffic

4.1.1 Issue

In their correspondence MCC and RMS has raised a number of comments in relation to the traffic modelling including clarification to the modelling assumptions that have informed the traffic and transport impacts assessed by GTA at Appendix H of the EIS.

4.1.2 Consultation

Since exhibition of the EIS the project team met with representatives of RMS and MCC on 4 September 2019 to discuss the feedback raised in the submissions which has informed the traffic response.

4.1.3 Proponents Response

A detailed review of the submissions and comments made by Council. RMS and Transport for NSW has been undertaken by GTA with a response to each specific comment provided at **Appendix A**.

MCC has provided the project team with additional traffic data which has been used by GTA as part of an amended traffic assessment. An amended Traffic Impact Assessment is provided at **Appendix E**. The traffic modelling outlined at Section 6.4 of the report has been amended to reflect the MCC data. A summary of the key findings from the revised traffic modelling is set out below.

Chelmsford Drive/ Metford Road Intersection Performance

The revised modelling for the performance of the Chelmsford Drive/ Metford Road (roundabout) is set out at **Table 1** below. The table identifies intersection performance at the opening of the NMH in 2022 without and with the development.

Table 1 2022 Intersection performance modelling results

Intersection Peak Period Leg			Degree of saturation		Average delay (sec)		Level of service	
			Existing	Proposed	Existing	Proposed	Existing	Proposed
Chelmsford Drive / Metford Road (Roundabout)	AM	South East	1.14	1.21	104	131	F	F
		North East	1.96	0.99	28	34	B	C
		North West	0.28	0.29	11	12	A	A
	PM	South East	0.86	0.96	32	49	C	D
		North East	0.98	1.26	40	140	C	F
		North West	0.47	0.48	12	12	A	A

The existing roundabout at Chelmsford Drive will operate over capacity in both the AM and PM peaks in 2022 and will further degrade in 2032. This is due to the insufficient opportunities for northbound traffic to enter the roundabout at Chelmsford Drive. Health Infrastructure propose to upgrade the roundabout to minimise the adverse effects of forecast additional traffic. Revised traffic modelling of the upgraded roundabout for 2022 and 2032 is shown at **Table 2** below.

Table 2 Chelmsford Drive / Metford Road (Roundabout) performance 2022 and 2032 (upgraded)

Intersection Peak Period Leg			Degree of saturation		Average delay (sec)		Level of service	
			Without NMH	With NMH	Without NMH	With NMH	Without NMH	With NMH
2022	AM	South East	0.39	0.40	14	14	A	B
		North East	0.44	0.45	11	11	A	A
		North West	0.28	0.29	12	12	A	A
		South East	0.33	0.40	13	14	A	B
		North East	0.43	0.56	12	14	A	A

Intersection Peak Period Leg			Degree of saturation		Average delay (sec)		Level of service	
			Without NMH	With NMH	Without NMH	With NMH	Without NMH	With NMH
	PM	North West	0.46	0.48	12	12	A	A
2032	AM	South East	0.54	0.55	16	16	B	B
		North East	0.56	0.58	12	12	A	A
		North West	0.35	0.40	12	12	A	A
	PM	South East	0.45	0.56	14	17	B	B
		North East	0.57	0.73	15	18	B	B
		North West	0.65	0.70	13	13	A	A

Table 2 shows that the proposed upgrade to the roundabout will ensure the intersection will operate with spare capacity to 2032. Health Infrastructure will be making a separate application under Part 5 of the EP&A Act for the upgrade of Chelmsford / Metford Road roundabout and is committed to completing the upgrade prior to the hospital becoming operational. The detailed design will be prepared in consultation with MCC.

Metford Road / Fieldsend Street and Metford Road / Raymond Terrace Road Intersection Performance

The modelling provided by MCC does not change the findings of the Metford Road / Fieldsend Street and Metford Road / Raymond Terrace Road Intersection performance for the2022 and 2032 growth scenarios, with and without the NMH development provided in the EIS. The intersection of Fieldsend Street/ Metford Road will operate at an acceptable level of service with spare capacity. The existing roundabout at Metford Road/ Raymond Terrace Road would operate at capacity in the PM peak period as a result of the expected traffic increase from the Thornton North and Chisholm residential developments.

Metford Road Capacity and Future Road Widening

GTA has incorporated MCC traffic data to complete further investigation of the future performance of Metford Road, including an updated midblock analysis for Metford Road. The midblock analysis has considered each growth year between 2022 and 2032, with and without the development, and the results are provided in **Appendix E**.

In summary, Metford Road is expected to reach a volume/capacity ratio of 0.9 (Level of Service E) in 2024 with the hospital development in the PM peak. Level of Service E indicates that the traffic volumes are close to capacity and therefore minor disturbances within the traffic stream could cause breakdown. It is noted however that the traffic assessment assumes all traffic associated with the completed hospital development would occur from the year of opening (2022) however in the hospital will not be operating at full development at the year of opening. Therefore, the year in which Metford Road reaches capacity would also be later than 2024 and is expected to occur in 2029 or later.

The results indicate that regardless of the hospital development it is likely that Metford Road will not require upgrading prior to 2029.

The Hunter and Central Coast Development Corporation (HCCDC) has established the East Maitland Catalyst Area Steering Group (see **Section 2.0**) to support the work of MCC and key NSW Government agencies in achieving the vision and outcomes of the East Maitland Catalyst Area. The Catalyst Area program will identify the need to plan for, fund and deliver infrastructure (including Metford Road).

4.2 Contamination

4.2.1 Issue

In their submission MCC requested clarification of the contamination assessment undertaken for Part Lot 401. MCC also sought to clarify whether stockpiling of materials has occurred on Part lot 401 as part of the Stage 1 development.

4.2.2 Proponents Response

Additional information regarding Part Lot 401 has been prepared by GHD and JBS&G, including;

- Site Investigation Report (**Appendix G**);
- Remediation Action Plan (**Appendix H**); and
- Interim Site Audit Advice (**Appendix I**).

In accordance with Clause 5.22(2) of the EP&A Act environmental planning instruments, including State Environmental Planning Policy 55 (SEPP 55) do not apply in respect of SSI. Notwithstanding, HI has undertaken a contamination assessment that is consistent with the objectives of SEPP 55.

A Site Investigation Report for Part Lot 401 has been prepared by GHD (**Appendix G**) to assess the potential for any residual evidence of contamination following remediation of Part Lot 401 being the planned location for on-grade car parking as part of the new Maitland Hospital development. The findings of the investigations to date are based on evidence including historical site use, site observations and sampling and analysis from discrete locations. The following contaminants of concern identified as part of the report include:

- Filling at various locations across the site potentially contain demolition waste and asbestos containing materials (ACM); and
- Naturally occurring carbonaceous soils and shale oils (source of TRH and PAH contamination).

A conceptual site model is provided at Section 6 of **Appendix G** and Section 2.6 of **Appendix H**.

Whilst Part Lot 401 has been remediated by the current landowner, there is the possibility that unexpected contamination could be encountered during further due diligence or earthworks when developing the site.

Accordingly, GHD confirms that the information presented in the Site Investigation Report is sufficient in determining the remediation or management strategy that may apply to the site to ensure the site can be made suitable for the proposed use. GHD has prepared a Remediation Action Plan (**Appendix H**) for the proposed remediation and soil management programs, procedures and standards which are to be followed during the course of the development, to ensure the successful remediation of the site and consequently the protection of the environment and human health, so that the site can be made suitable for the nominated land uses.

The RAP includes recommended remediation or management methods to address potential contamination scenarios, including:

- Isolated instances of asbestos-containing material (ACM);
- Areas of anthropogenic wastes;
- Presence of natural carbonaceous materials; and
- Potential for “unexpected finds” of contamination.

GHD considers that the Part Lot 401 site can be made suitable for the proposed use (hospital car park) by implementation of the RAP during development of the site.

In addition, further investigation will be undertaken to validate any ‘data gaps’ noted in the site investigation report. GHD has detailed the framework for further contamination assessment as outlined at Section 7 of **Appendix G**. The framework is based on guidelines published or approved by the NSW EPA under Section 105 of the Contaminated Land Management (CLM) Act 1997.

Health Infrastructure will undertake further site investigations as set out in the RAP prior to the commencement of site preparation works on Part Lot 401 as requested in the EPA submission ahead of preparing a Site Audit Statement and Site Audit Report by the Site Auditor (JBS&G).

JBS&G has prepared Interim Site Audit Advice (**Appendix I**) which confirms the reports completed to date by the consultant (GHD) have been undertaken in accordance with relevant guidelines made or approved by the NSW Environment Protection Authority (EPA).

4.2.3 Stockpiling of material

GHD has confirmed in **Appendix G** that no materials from Lot 7314 have been relocated or stockpiled on Part Lot 401 as part of the Stage 1 SSI early works.

4.3 Biodiversity Assessment

4.3.1 Issue

The Biodiversity and Conservation Division of DPIE (formerly OEH) has requested clarification to the validity of threatened flora and fauna surveys undertaken by General Flora and Fauna (2014) which is used for the BDAR assessment.

4.3.2 Consultation

Following exhibition of the EIS the project team met with representatives of the Biodiversity and Conservation Division on 16 August 2019 to discuss the feedback raised in the submission and has informed the response.

4.3.3 Proponents Response

The Biodiversity Conservation Act came into force on 25 August 2017. The NMH Biodiversity Assessment prepared for the Stage 1 SSI 9022 was substantially commenced prior to 25 August 2017 and has been prepared under the previous legislation as this was applicable at the time that surveys, and the majority of the assessment was undertaken.

We note that Clause 32 of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017* applies to the NMH project. The projects consistency with Clause 32 is set out at Table X below.

Table 3 Review of consistency with Clause 32

Provision	Comment
Clause 32 - Data collected for BAM assessments before the commencement of the new Act	
(1) For the purposes of Part 7 of the new Act, the use of data collected before the commencement of the new Act is taken to be collected in accordance with the Biodiversity Assessment Method if:	The Biodiversity Conservation Act came into force on 25 August 2017. The NMH Biodiversity Assessment prepared for the Stage 1 SSI 9022 was substantially commenced prior to 25 August 2017.
(a) the data was collected in a manner that is substantially consistent with the Biodiversity Assessment Method, and	The survey data was collected by General (2014) in a manner that is consistent with the current Biodiversity Assessment Method (BAM) (BAM requires targeted surveys for candidate species considered as possible occurrences on the subject site in accordance with relevant survey guidelines). The targeted Threatened fauna surveys undertaken by General (2014) were in accordance with DEC (2004) which were the current guidelines at the time and are substantially consistent with more current fauna guidelines (eg. 2009 amphibian guidelines). The targeted Threatened flora surveys undertaken by General (2014) were in accordance with Cropper (1993) which were the current guidelines at the time and again are substantially consistent with the more current 2016 plant guidelines (eg. parallel line transects). General (2014) presented locations of Threatened flora and fauna survey sites (refer Figures 4 and 5) of the Stage 1 Biodiversity Assessment Report.
(b) the data was collected by an accredited person.	The data was collected by an accredited person as defined and identified below.
(2) An accredited person is:	N/A
(a) a person who was accredited under section 142B of the Threatened Species Conservation Act 1995 when the data concerned was collected, or *(b) a person who is accredited under section 6.10 of the new Act.*	Greg Little from General (2014) is a BAM accredited assessor under Section 6.10 of the new Act.

The OEH Biodiversity Assessment Method Operational Manual Stage 1 outlines that

> *… field surveys (including targeted surveys for 'species credits species') less than five years old can be used in place of onsite survey*.

The EIS was lodged on 21 June 2019 which is within 5 years of the completion of the October – December 2014 field surveys undertaken by General Flora and Fauna. The OEH has also undertaken its assessment within the 5 year period. The data collected as part of the Flora and Fauna assessment for Stage 1 SSI (9022) and in accordance with Clause 32 of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017* and is accordingly appropriate for use as part of the NMH Stage 2 project.

An amended BDAR has been prepared by Sclerophyll that addresses the comments raised in the submissions as outlined at **Appendix A** and is provided at **Appendix F**.

4.4 Industrial Heritage

4.4.1 Issue

MCC have sought clarification to the retrieval and re-use of material associated with the demolished former brick press building located on land in the vicinity of the SSI project and its potential for use as part of the NMH project.

4.4.2 Proponents Response

The detailed design of the NMH recognises the importance of heritage interpretation, which has been a focus of the project team by obtaining community input and honouring the cultural and industrial history in the detailed design philosophy. This is demonstrated in Health Infrastructure's continued commitment under an established Memorandum of Understanding with both MCC and HNELHD to ensure place-based planning principles underpin the design approach at NMH.

The project team are interfacing heritage across 3 interconnected layers:

1. **Partnership with Maitland City Council**: 'Collected Memory' – transferring memory from existing hospital to the new, celebrating the City's heritage and Gallery's arts in health programs for recurrent programming beyond the life of construction. Local historians, Dr Janis Wilton OAM and Joe Eisenberg OAM, have been engaged to review histories related to the existing and new hospital sites for reinterpretation in the new hospital building, from which the industrial heritage was identified. MCC supported the resulting report and forward approach in their August 2019 Council Meeting. The next stage focuses on community engagement to develop opportunities for related stories to be told/displayed in various forms across the new hospital. The project team look forward to engaging with Council's Heritage Advisor Clare James and the local community throughout this next stage to add value to staff and patient experience at the new hospital.
2. **Façade design**: Inspired by place both Indigenous and post-colonial, using bricks as a façade fabric was deliberately intended to reflect the heritage of the brick works and a Wonnarua artist has been commissioned with the support of Mindaribba ALC to support the architectural design of Arbour and brickette materiality fronting the main entrance and vehicle set down zones.
3. **Landscape design**: after prioritising clinical care spaces, there are opportunities to consider heritage interpretation over the longer term as part of the external grounds inclusive of Indigenous, industrial, social and other. For example, the open grassed area in front of the new hospital provides an open space / environment for story telling/lunch time performances, with internal accessible courtyards on Level 1 and 2 affording areas that independent community projects, and over the longer term, can further support dynamic heritage interpretations with a charitable focus for increased levels of engagement and ownership.

In response to the SEARS, Section 3.8 and 5.16 confirmed that the former Brick Press Building is located on Part Lot 401, outside of the SSI site boundary of the NMH. It is not necessary to physically use the former brickwork material within NMH to interpret its history and NMH does not intend to use these materials as part of the NMH SSI project. We note that the broader Metford Triangle will be developed in the future as a new precinct and there is greater opportunity to utilise the salvaged materials within the new precinct in a variety of ways. As outlined above, significant effort has been given to incorporate heritage considerations by the project within certain constraints.

Accordingly, as outlined above, all heritage elements will be evaluated based on clinical priorities, safety, visitor experience and value for money and HI look forward to continuing the MCC partnership towards realising the objectives of the MOU.

5.0 Proposed Amended Development

Since public exhibition of the proposal, minor amendments and improvements have been made to the proposed development, along with adjustments made to strengthen and enhance the design of the proposal. The following section presents a brief updated description (where relevant) of the modified development for which approval is sought. Accordingly, and as detailed in Section 5.0, the changes are not considered to give rise to any material alteration to the environmental assessment of the potential impacts considered as part of the original development application.

5.1 Key Design Changes

It is noted that there have been some changes to the proposal since the submission of the exhibition documents as a result of design development. The changes are relatively minor and are largely driven by the need to refine the proposed building and car parks.

The key changes to the design are summarised as follows:

- Relocation of the helipad from the ground to the roof of the ASB;
- Inclusion of a courtyard adjacent to the Operating Theatre Department (Level 1);
- Inclusion of landscaping details for the Three (3) landscape courtyards on Level 1;
- Improved Emergency Department entrance and pedestrian crossing;
- Improved main entry public plaza and pedestrian zone;
- Reconfiguration of the car park layout (no change to the number of parking spaces);
- Reconfiguration of the bus layover to accommodate two buses;
- Modification to arrangement of windows to align with clinical planning; and
- Inclusion of a bin wash bay adjacent to the loading dock.

Amended Architectural Plans have been prepared by BVN at **Appendix B** with amended Landscape Plan prepared by Black Beetle at **Appendix D**. A detailed summary of design changes is provided by CBRE at **Appendix C**.

An environmental assessment of relevant issues is provided below.

5.2 Overview of Proposal (as amended)

The proposal seeks approval for the following key development:

- The construction and operation of a new 7 storey Acute Services Building, containing;
  - An Emergency Department;
  - Medical, surgical, paediatric and maternity services;
  - Critical care services for adults and babies, including a special care nursery;
  - Operating theatres, delivery suites and assessment rooms;
  - Palliative care and rehabilitation services;
  - Mental health services;
  - Satellite renal dialysis;
  - A new chemotherapy service;
  - Oral health service;

  - A range of ambulatory care and outpatient clinics;
  - Rooftop helipad.
- Site preparation including earthworks, cut and fill;
- Construction of internal roadways and car parking for staff, patients and visitors;
- Site landscaping;
- Signage;
- Tree removal; and
- Utility services connections and amplification works.

An artist's impression of the NMH building incorporating the new rooftop helipad is shown at **Figure 1**.

Figure 1 Artist's impression of the NMH western facade

Source: BVN

5.3 Key Numerical Information

Table 4 provides the key numerical information of the proposed amended development.

Table 4 Key development information

Component	Proposal	Change
Site area	193,700m^2	No change
GFA	49,000m^2 (approximately)	No change
Maximum Height	31.8m (RL 52.10m)	34.15m (RL 54.45)
Beds	339	No change
Car spaces	682	No change

6.0 Additional Information and Assessment

The exhibited EIS assessed the potential impacts of the overall development against a range of matters relevant to the development. Except where addressed in this report, the conclusions of the original assessment remain unchanged.

6.1 Stage 1 SSI Concept Proposal

Section 5.21(2) provides that an approval granted on the determination of a staged infrastructure application for infrastructure does not have any effect to the extent that it is inconsistent with the determination of any further application for approval in respect of that infrastructure. Notwithstanding, all key elements of the proposed development have remained unchanged from originally submitted.

It is noted the height of the ASB has increased by 2.35m in response to detailed design progression to accommodate lift services for the helipad. The number of floors has not changed, and the scheme remains generally consistent with, and does not substantially differ from, the development as originally proposed. The proposed development's relationship with key development parameters of the approved Concept Proposal are reviewed at **Table 5**.

Table 5 Concept Proposal Analysis

Component	Concept Proposal	Proposed development	Amended development	Generally Consistent
Land Use	Hospital	Hospital	Hospital	✓
Height	9 storeys / RL 50.8m	8 storeys / RL 52.1	8 storeys / RL 54.45	✓
GFA	60,000m^2	49,000m^2	49,000m^2	✓

6.2 Helipad

The location of the helipad has been relocated from ground level to the roof of the ASB to improve the operational efficiency of patient transfers. A structural statement regarding the design is provided by TTW at **Appendix P.** A assessment of the subsequent environmental effects of the relocated helipad is provided below.

6.2.1 Noise Impacts

The design has been updated to include a rooftop helipad in lieu of the on-grade helipad. The proposed helicopter flight path is described in the updated Aviation Report at **Appendix K**. A further assessment of the noise impacts associated with emergency helicopter movements is provided at **Appendix J**, which states:

> *"A worst-case helicopter movement is predicted to not exceed 85dB Lmax at the nearest residential receivers. Which is both 10db less than the Air Services Australia noise guideline of 95dB(A) Lmax, and no higher than what was nominated in the original SSI2 report."*

Accordingly, there is no additional environmental impact than considered at Section 5.6.2 the EIS.

6.2.2 Wind

An assessment of downwash from helicopter operations over the ASB (including its outdoor courtyards) has been undertaken by Windtech at **Appendix L**. Windtech confirm that there is not expected to be any significant impacts on Ground level areas or northern terrace and courtyards on Level 1, 2 and 3.

There may be infrequent wind effects from helicopter operations on southern terrace and courtyards on level 3. These spaces currently include balcony screening to these spaces. Windtech confirm the screening should be retained as a precautionary measure. However, Windtech conclude that it is not expected that that any adverse wind conditions are going to be experienced at the southern balcony due to the helicopter downwash.

6.3 Tree Removal

Since the exhibition of the EIS the findings of the Arborist Report have been reviewed to align with the vegetation to be removed as identified by the BDAR (refer to **Appendix F**). The revised Arborist Report confirms that the proposal will require removal of 49 trees in the eastern location of the northern car park, Previously only captured in the surveyed project influence area referenced in the BDAR. For completeness, these trees are identified in a revised Arborist Report at **Appendix M**. Overall the proposal will require removal of 258 trees to accommodate the Stage 2 development while 241 trees are identified for retention. The findings at Section 5.11 of the EIS, including mitigation measures remain unchanged.

7.0 Conclusion

The proponent and project team have considered all submissions made in relation to the public exhibition of the proposal. A considered and detailed response to all submissions has been provided within the accompanying documentation.

In responding to and addressing the range of matters raised, the proposal has been refined pursuant to Clause 55 of the *Environmental Planning and Assessment Regulation 2000*.

We trust that the responses provided above will enable the Department to finalise their assessment of the SSI DA. Given the environmental planning merits (and the ability to suitably manage and mitigate any potential impacts) and significant public benefits proposed, it is requested that the Minister approve the application.