

Attachment A - Liverpool Hospital Integrated Services Building SSD10389 – Response to Request for Additional Information

Issue	Proponent's Response
Department of Planning, Industry and Environment	
Revised plans clearly demonstrating the site boundary.	Refer to Attachment B and D .
Clarification and confirmation regarding the proposed 'extended' construction hours for Saturday is 1-3pm and 'special' construction hours for Saturday is 5-10pm, and the works to be undertaken in the extended construction hours versus the special construction hours. Further details of works to be undertaken within the special construction hour works (including frequency and timeframe).	<p>It is clarified that extended construction hours sought are 1-5pm Saturdays (rather than 1pm-3pm Saturdays). The proposed construction hours have been categorised into 'recommended standard hours', 'outside recommended standard hours' and 'special construction hours' as the EPA guidelines adopt differing strategies for noise control depending on the predicted noise level at the nearest residences and the time of day.</p> <p>Accordingly, while the same works will be undertaken during the 'outside recommended standard hours' and 'special construction hours' the Acoustic Impact Assessment (submitted with the RTS response package in September 2020) has categorised these to appropriately assess the impact in accordance with the guidelines and at the relevant time.</p> <p>The works are minor and only required on a limited/ad-hoc basis and so exact identification of frequency and timeframes is not considered necessary. Further detail on the frequency and timeframe for works can be provided in the Construction and Environmental Management Plan prepared by the principal contractor prior to demolition and construction works occurring if required.</p>
Liverpool City Council	
Traffic Planning Consideration Council supports the intended objective of the proposed shared zone to create a more pedestrianised area which complements the active frontage proposed as part of the redevelopment. However, a number of concerns in relation to the proposed shared zone along Campbell Street were identified in our previous letter:	<p>The project aims to minimise vehicular traffic in this section of Campbell Street to facilitate pedestrian connection between Liverpool Hospital and the proposed Education and Research Hub building and the broader education and research zone to the north of Campbell Street in accordance with the Liverpool Innovation Precinct Land Use Strategy. The expectation is that traffic will find an alternate route, as assessed in the Transport and Accessibility Impact Assessment prepared by GTA Consultants.</p> <p>Please note that the pedestrianisation of Campbell Street is fundamental to achieving the vision of the Liverpool Innovation Precinct (LIP), promoting investment and employment in Liverpool (ref.</p>
<p>a) The proposed street narrowing design will reduce the existing operational capacity of Goulburn Street/Campbell Street signalised intersection and result in a long queue and delays along Campbell Street East.</p>	

	https://www.liverpool.nsw.gov.au/business/innovation/health-education-research-innovation-precinct .
<p>b) This section of Campbell Street accommodates a range of bus services (Bus Routes 851,853,854 and 857) which service the Liverpool CBD and the schools. The proposed shared zone will have significant impacts on the bus operations including school bus services. As such, approvals are required from TfNSW, the bus operators and the schools for the affected bus services or any changes to the existing bus routes.</p>	<p>TfNSW have reviewed the proposal and responded in writing to DPIE on 6 July 2020 and 30 Sep 2020. The TfNSW review includes internal consultation with Infrastructure and Services, who are responsible for the respective bus contract region. As noted on page 46 of Transport and Accessibility Impact Assessment prepared by GTA Consultants, further consultation is proposed post SSDA approval.</p>
<p>c) The proposed shared zone (i.e. 10km/h speed zone area) should be referred to Transport for NSW for approval.</p>	<p>Health Infrastructure has consulted with both High Schools over the past 12 months in relation to the whole LHAP redevelopment. Consultation to date has included specific discussions in relation to the Campbell Street proposal including traffic impacts, pick-up/ drop-off arrangements and bus services. Both schools have expressed support for the proposal.</p> <p>Further consultation is proposed with both the high schools and TfNSW post SSDA approval, with any comments to be addressed the detailed design package to be prepared for the required Roads Act (S138) approval, including Speed Zoning approval from TfNSW.</p>
<p>d) The proposed directional signage along Hume Highway and other local streets should be referred to Transport for NSW and Council's Pedestrian, Active Transport and Traffic Committee for approval.</p>	<p>Supporting directional signage along Hume Highway and other local streets would be addressed prior occupation and can form an appropriate condition of consent.</p>
<p>It is considered that the GTA response letter dated 4 September 2020 has not adequately addressed the above concerns. Council is therefore not in a position to provide an "in principle" support to the proposed shared zone concept along Campbell Street as the concept requires approvals from TfNSW, the bus operators and the Liverpool Boy and Girl high schools.</p> <p>Council requests that every attempt is made to address these concerns. In the event that shared zone is unachievable in the form proposed, it is recommended that the applicant investigate alternative treatments to the roadway so as to balance traffic concerns with the intended objective of the shared zone.</p>	<p>TfNSW have reviewed the proposal and responded in writing to DPIE on 6 July 2020 and 30 Sep 2020. The TfNSW review includes internal consultation with Infrastructure and Services, who are responsible for the respective bus contract region. As noted on page 46 of Transport and Accessibility Impact Assessment prepared by GTA Consultants, further consultation would in any event be undertaken as part of the Section 138 Approval under the Roads Act.</p> <p>A workshop was held with Council on 3 August 2020 to discuss the Campbell Street Shared Zone proposal and associated works. Council indicated in-principle support for the Shared Zone and change in priority at the Lachlan Street/Forbes Street intersection, subject to investigation of kerb extensions to improve pedestrian safety and detailed design resolution as part of the Section 138 approval required prior to commencement of the road works. It is expected that the S138 process will require the design to be reviewed via Council's Traffic Committee which includes Council and TfNSW in any event, ensuring the outcome sought by Council is achieved.</p>

	<p>It is recommended that the Department include a condition confirming that only the concept of the shareway is approved and the detailed design of the shareway would be subject to further approval under Section 138 of the Roads Act.</p>
<p>The SIDRA modelling analysis indicates that Lachlan Street/Goulburn Street intersection will be operated at its capacity (i.e. Degree of Saturation at 1.0) under post development AM peak hour network operation with Campbell Street shared zone scenario. It is noted that the DoS of this intersection has dramatically changed to 0.12 under the mitigated Forbes Street/Lachlan Street intersection layout scenario. It appears some discrepancies in the modelling results presented in the GTA letter.</p> <p>As such, an electronic copy of SIDRA network models and a tech memo outlining the modelling assumptions are to be submitted for review. The submitted models should include the following intersections which are assessed in the traffic impact assessment report and GTA response:</p> <ol style="list-style-type: none"> Elizabeth Street/Goulburn Street intersection; Lachlan Street/Forbes Street intersection; Lachlan Street/Goulburn Street intersection; Campbell Street/Goulburn Street intersection; and Lachlan Street/Burnside Drive/Hart Street intersection. 	<p>The SIDRA modelling results are correct. To clarify, Lachlan Street/ Goulburn Street is anticipated to operate at a degree of saturation of 1.0 with the shared zone based on the existing intersection layouts. This is due to the existing Forbes Street/ Lachlan Street intersection having stop sign controls on the Lachlan Street approaches. Once traffic is diverted from Campbell Street to Lachlan Street due to the implementation of the shared zone, the existing stop control at the Lachlan Street/ Forbes Street intersection would ultimately result in queues extending back to the Lachlan Street/ Goulburn Street intersection, significantly impacting the operation of this intersection without further mitigation.</p> <p>The proposed mitigation measures involve reversing the priorities of the Forbes Street/ Lachlan Street intersection so that Lachlan Street is the major road and the stop controls would be located on the Forbes Street approaches. This modification results in significantly less queuing on the western approach to the Forbes Street/ Lachlan Street intersection and would not impact the adjacent Lachlan Street/ Goulburn Street intersection, thus resulting in a significantly improved degree of saturation compared to the unmitigated scenario.</p> <p>Modelling assumptions for the shared zone analysis are included in Section 9.5 of the Transport and Accessibility Assessment (GTA, 6 May 2020) submitted as part of the SSDA. SIDRA modelling files will be provided to Council.</p>
<p>Environmental Health Considerations</p> <p>The Department of Planning, Industry and Environment is requested to consider the representations made by Council's Environmental Health Section and NSW Environment Protection Authority when assessing adherence to the SEARs issued 27th November 2019, State Environmental Planning Policy No. 55- Remediation of Land and State Environmental Planning Policy No. 33- Hazardous and Offensive Development.</p> <p>JK Environments Pty Ltd confirmed that the site was contaminated and could be made suitable for the proposed use subject to remediation, validation and the preparation of a Long-Term Environmental Management Plan if a capping and containment approach to site remediation was adopted (Option 4 of the RAP). Council's Environmental Health Section generally discourages the on-site containment and encapsulation of contamination. In addition to the Long-Term Environmental Management Plan, this approach would result in a notation on the planning certificate for the property. Further to the NSW EPA's requirements, Council's Environmental Health Section requests for the Application to be supported by a Section B1 and B2 Site Audit Statement prepared by a NSW EPA Accredited Site Auditor to determine the nature and extent of contamination and the appropriateness of the management plan. This requirement would ultimately lead to the preparation of a Section A2 Site Audit Statement by a NSW</p>	<p>The NSW EPA Guidelines for Consultants Reporting on Contaminated Land (2020) require that all remediation options are assessed and a rational for the selection or the recommended remedial option/s is provided. This was addressed in Section 6 of the JKE RAP. The preferred remedial approach is outlined in Section 6.3 of the RAP (excavation and off-site disposal of the contaminated material) due to excavations being required for the proposed basement. For areas outside of the basement, capping and containment was identified as an option in the RAP if excavation and off-site disposal of contaminated material was assessed as not practical during implementation of the RAP. This will be dictated by the post-demolition validation assessment which will further assess the extent of contamination.</p> <p>The NSW EPA follows the hierarchy set out in National Environmental Protection Measure (2013) for the remediation of contaminated sites. Capping, containment and management via a Long-Term Environmental Management Plan is a viable remedial strategy and preferred over excavation and offsite disposal for a number of reasons including sustainability.</p> <p>Councils request for the SSDA application to be supported by a Section B1 and B2 Site Audit Statement prepared by a NSW EPA Accredited Site Auditor is not consistent with</p>

EPA Accredited Site Auditor to determine land use suitability subject to compliance with either an active or passive environmental management plan.	the NSW EPAs previous submission. The NSW EPA noted that “the applicant must obtain from a NSW EPA-accredited Site Auditor a Section A2 Site Audit Statement and submit it to the Planning Secretary and relevant Council no later than one month before commencement of operation”. Accordingly, it is considered that JKE preferred remedial approach as outlined in Section 6.3 of the RAP is appropriate and in accordance with the NSW EPA Guidelines.
In addition to these requirements, appropriate controls shall be incorporated into the design and construction of the proposed development to mitigate potential impacts on human health and the environment. In this regard, the construction and fit-out of the retail component of the premises must comply with relevant legislative requirements and Australian Standards such as the Food Act 2003, Australian Standard 4674-2004 Design, Construction and Fit-Out of Food Premises, Public Health Act 2010, Public Health Regulation 2012 and Local Government (General) Regulation 2005. Installation, operation and maintenance of cooling water systems and warm water systems at the premises must also comply with the Public Health Act 2010, Public Health Regulation 2012 and AS/NZS 3666 Set:2011.	The project will comply with all relevant legislative requirements and Australian Standards.
It is strongly recommended that mechanical plant is selected in consultation with a suitably qualified acoustic consultant at the detailed design stage to ensure compliance with the assessment criteria. In addition, a Construction Environmental Management Plan comprising a Noise and Vibration Management Plan (NMP) shall be prepared for the proposed development prior to commencement of construction.	Noted.
<p>Urban Design Consideration – Context</p> <p>It is acknowledged that Goulburn Street frontage of the Liverpool Hospital does not form a part of the current SSD DA works application, however, it is recommended that the landscape/public domain plans include/indicate the proposed upgrades to Goulburn Street, which will be eventually be delivered as part of the Liverpool Innovation Precinct.</p> <p>The incorporation of granite banding to establish a gradual transition in paving type is supported. Consider incorporating additional elements within the paving pattern (e.g. engravings or paving inlays) that imparts further value to the paving design, as part of the detailed design for the paving located within the public domain.</p>	Public domain works (not part of the scope of this project) are identified on the amended Landscape Plan at Attachment D . Paving patterns can be considered, however the incorporation of this will be evaluated in conjunction with the campus wide arts strategy.
<p>Urban Design Consideration – Sustainability</p> <p>The commitment to achieve a 5 star – Green Star Rating for the proposed development as outlined in ‘Appendix A – Liverpool Hospital Integrated Services Building (SSD 10389) - Response to Agency Submissions’ is supported.</p>	Noted. The proposed development has been designed in accordance with the Health Infrastructure ESD Framework - <i>Guidance Note no.58 Environmentally Sustainable Development</i> .
<p>Urban Design Consideration – Landscape</p> <p>The landscape plans should include/indicate all proposed public domain works along Goulburn Street (i.e. between Campbell Street and Elizabeth Street). This will help establish the overall design context and illustrate the relationship between the SSD DA works and other public domain works being proposed as part of the Liverpool Innovation Precinct.</p>	Public domain works (not part of the scope of this project) are identified on the amended Landscape Plan at Attachment D .

The proposed paving design and revised furniture palette is supported. It is recommended to ensure that all seating areas within the precinct are provided with adequate shade especially during the hot summer months.	Noted.
The proposed planting palette for the development is supported; however, it is recommended to include some sensory plant species to assist in improving the mental and physical wellbeing of the users that would help create a healthier environment around the hospital precinct.	Noted. A wide variety of plants have been used in the design, including species with sensory qualities where appropriate such as Gardenia, Lavender and Native Grevillea to provide an inviting environment thereby supporting mental and physical wellbeing.
It is reiterated that the retention of <i>Corymbia citriodora</i> , Lemon Scented Gums along Campbell Street is strongly preferred by Council. If this is not achievable, an alternative outcome/solution that meets the objective of our previously provided comments should be proposed as part of the development.	The retention of a number of trees including the <i>Corymbia citriodora</i> is not possible due to the crown impacts with adjoining buildings. Accordingly, this tree is proposed to be replaced with <i>Lophostemon confertus</i> , which can be managed to avoid the recurrence of such impacts.
The proposed redevelopment of the hospital precinct includes removal of significant number trees across the site which will reduce the amount of existing tree canopy in Liverpool. It is recommended that the landscape plans show calculations, in respect of the amount existing tree canopy within the site, and provide a comparison matrix of the tree canopy that will be achieved at different intervals (i.e. on day one, after five years, after ten years and at full maturity).	<p>As part of the Response to Submissions and Additional Information report prepared by Ethos Urban and dated 9 September 2020, an analysis of the tree canopy coverage from that which currently exists as well as the expected tree canopy coverage on planting day and at 5 year increments was undertaken.</p> <p>It should be noted that given the scale of the project it is not possible to have 100% canopy coverage on planting day. However, through the addition of an increase in soft scape landscaping and significant improvements to the public domain, the proposed planting will result in a canopy coverage of more than 87% in 5 years' time post development and more than 350% canopy cover at mature growth.</p>
It is recommended that an equal amount of vegetation/canopy cover is provided from day one. If this is not achievable, an alternative outcome/solution that meets the objective of our comments should be proposed as part of the development.	It is not physically possible to instantly replace lost canopy even with extensive new plantings. As per the tree canopy calculations provided in the Response to Submissions and Additional Information report prepared by Ethos Urban and dated 9 September 2020 (and in the supporting documentation prepared by Clouston Associates), in 5 years' time the tree canopy coverage will be more than 87% and more than 350% canopy cover at mature growth. Accordingly, the public benefits are considered to significantly outweigh the loss of some canopy cover on planting day.
Urban Design Consideration – Amenity The idea of establishing of the Arts Working Group (AWG) and preparation of a campus wide Public Arts Strategy is supported. It is recommended that Council's Public Arts Officer is engaged in the early stages of the development of the strategy to ensure an optimal outcome is achieved for the precinct.	Noted.
Urban Design Consideration – Aesthetics The amendments to the external façade along the southern side of the hospital building and the existing clinical services building is supported. It is recommended to incorporate vegetation/vertical planting along the proposed colonnade to improve the architectural character and achieve an increased visual amenity.	The proposed development includes significant landscaping and tree planting in the front entrance to provide a high quality public domain and complement the architectural character.
City Economy Consideration Council is encouraged by the plans for wayfinding inside the development. However, it is considered appropriate that the development also contribute to wayfinding in the	The proposed development is on an existing hospital campus site that is not changing location. It is not considered appropriate that HI provide further wayfinding throughout the Liverpool CBD.

<p>CBD. Accordingly, a condition should be applied to any consent that requires the applicant to provide signage or an equivalent dollar contribution to wayfinding in the CBD. An example of this can be found in Condition 107 of DA-926/2018.</p>	
<p>Heritage NSW</p>	
<p>The Addendum Stage of Heritage prepared by RPS dated 7 August 2020 provides a clearer outline of the areas across the site where archaeological resources have been identified previously. It also clearly shows these areas of archaeological potential and previous excavation relative to the study area and the current suit of impacts. It argues that the site contains nil to low archaeological potential for remains which may range from the first historic occupation in Liverpool (evidenced in part in the excavation of the c1827 Moore Hall linked to Thomas Moore) to the present day. HNSW understands that the heritage significance of the Moore Hall including its later phases of occupation within the site would be at a State level. Although most of this occupation evidence was removed archaeologically (and reported in 1995), potential for other parts of this site not previously removed remains, although RPS note this is limited.</p>	<p>Noted.</p>
<p>The question of significance for the 19th Century drainage system is addressed by RPS in p14 of the addendum SOHI, which concludes it 'is likely to be significant at a local level only ... Previous archaeological assessment of the LHAP (AHMS 2007) also found that archaeological remains including any potential drain network would be significant at a local level only'. HNSW notes that in an assessment of significance, there is a need to be clear what historical research and evidence is used to justify the conclusion. It is best expressed in a succinct statement of significance. HNSW does not support an argument based on a previous conclusion where the drainage network is not clearly the same as the one under discussion now (in phasing, context or location).</p>	<p>This will be addressed in the submission of documentation outlined in the Heritage NSW recommended Conditions of Consent: Historical Archaeological Management (b).</p>
<p>The earlier RPS assessment identified that there is potential for the 19th century drainage network to be found. However, it recommended applying unexpected finds to recording the structure, if it is found, presumably through bulk excavation. Although not 'relics' under the Heritage Act 1977, these structures are clearly not unexpected, although their location is not known. Given their significance, a proactive program may be warranted to adequately record these structures to understand their phasing, context and location and allow their management by significance. Further historical research may assist to better target this approach. HNSW does not consider that responding to their discovery by machine is the best approach to managing these locally significant site elements. We do not support the rephrasing of Recommendation 3, i.e. that the drains should be managed 'if encountered during development'. The proposed archaeological strategy should be amended to include the 19th century drains across the areas of impact, as previously advised there is a likelihood for these to survive intact in localized, less disturbed areas of the site without basements.</p>	<p>This will be addressed in the submission of documentation outlined in the Heritage NSW recommended Conditions of Consent: Historical Archaeological Management (b).</p>
<p>The archaeological strategy proposed does not relate well to the archaeological potential and significance argued in the SOHI or its addendum. Figure 10 shows the proposed monitoring program would only be focused at the south-west of the study area which would be bounded by the former Moore Hall excavation to the east as documented by Higginbotham in 1995. It is unclear why less disturbed parts of the site,</p>	<p>This will be addressed in the submission of documentation outlined in the Heritage NSW recommended Conditions of Consent: Historical Archaeological Management (b).</p>

<p>with potential to retain occupation evidence associated with earlier site phases, including the 19th century drainage system, would not also be included in the proposed archaeological strategy. HNSW does not support the current research questions. The strategy's research questions do not address the phases of occupation identified for the area proposed, and do not reference relevant questions raised from results of previous excavation of the site (e.g. Moore Hall). The research design should be revised to better respond to detailed site-specific historical research and the previous archaeological investigations undertaken across the Liverpool Hospital site. This should be used to prepare appropriate questions and a method to investigate and record the significant historical archaeology.</p>	
<p>HNSW recommends the conditions of consent are included, if the project is approved by the Department of Planning, Industry and Environment. Refer to submission.</p>	<p>In response to the recommended conditions, the following are proposed:</p> <ul style="list-style-type: none"> • RPS will nominate excavation directors for the project as recommended by Heritage NSW post approval. RPS will also prepare the following: <ul style="list-style-type: none"> ◦ Archaeological Research Design and Methodology with relevant supporting documentation <u>post project approval</u> with the ARD submitted to the Heritage Council for comment. ◦ An Archaeological Investigation Report in accordance with condition c) within 12 months of the completion of archaeological excavations; and ◦ An Interpretation Strategy in accordance with condition d) within 12 months of the completion of archaeological excavations.
<p>Transport for NSW</p>	
<p>Green / Workplace Travel Plan</p> <p>The Response to Submissions (RtS) notes that Health Infrastructure (HI) accepts the need for the preparation and monitoring of a Green / Workplace Travel Plan, along with a Travel Access Guide. The recommendations below are provided to encourage the use of sustainable transport to the site, which will help reduce the use of single vehicle trips.</p> <p>It is requested that prior to the issue of the first Occupation Certificate, the applicant be conditioned to prepare a Green/ Workplace Travel Plan in consultation with TfNSW for the proposed development which must be approved by TfNSW. The Travel Plan should be aimed at both staff and visitors and:</p> <ul style="list-style-type: none"> • Set mode share targets that encourage the use of public and active transport and reduce the proportion of single-occupant car journeys to the site; • Identify robust actions and strategies to meet the mode share targets in the first 2, 5 and 10 years post occupation; • Include a Transport Access Guide that provides information to employees, patients and visitors about the range of travel modes, access arrangements and supporting facilities that service the site including bicycle parking and other end of trip facilities; • Identify relevant workplace policies such as flexible working arrangements that enable administrative staff to travel outside peak periods, or which reduce the need for work related travel; 	<p>Noted.</p>

<ul style="list-style-type: none"> Consider the appropriateness of any relevant parking policies to manage travel demand, including a measure to apply higher car parking charges during peak times to encourage off-peak use; Details of carpooling operations and monitoring of parking priority; Appoint a Travel Plan Coordinator to oversee the implementation of the Travel Plan and Transport Access Guide; Nominate a party responsible for the ongoing monitoring and review of the Travel Plan, including the delivery of actions and associated mode share targets; Include a breakdown of staff shift patterns including the number of staff commencing shifts at particular times; and the residential postcodes of where those staff are travelling from, if known; and Include, if available, details of visiting hours and anticipated numbers of patients and visitors. 	
<p>Construction Traffic Management</p> <p>It is noted the applicant submitted a Construction Management Plan and Overview Construction Traffic Management Plan as part of the supporting documentation and has committed in the RtS to preparing a Construction Traffic and Pedestrian Management Plan prior to construction works commencing.</p> <p>It is noted the applicant submitted a Construction Management Plan and Overview Construction Traffic Management Plan as part of the supporting documentation and has committed in the RtS to preparing a Construction Traffic and Pedestrian Management Plan prior to construction works commencing.</p>	<p>Noted.</p>
<p>Environment, Energy and Science</p>	
<p>There is no further comment in relation to biodiversity.</p>	<p>Noted.</p>
<p>The proponent has noted EES comments which included a recommendation to Planning and Assessment Group that the consent include a condition requiring the development to comply with the requirements of the concessional development including evacuation requirements, car parking and driveways, flooding impacts, floor levels, building components, structural soundness, management and design, and fencing.</p>	<p>Noted.</p>
<p>NSW EPA</p>	
<p>The EPA considers the activities to be carried out during the proposed Saturday 1 pm to 3 pm out-of-hours works (as per the NVIA) to be reasonable based on the justification provided, however notes that significant noise impacts are predicted at Goulburn Street residences, where the Noise Management Level is predicted to be exceeded by up to 21dB. Consideration of the request for these extended hours should be made in the context of these potential significant impacts, and on the condition that the applicant commits to implementing all feasible and reasonable noise mitigation measures, including those in sections 13.6 and 13.7 of the NVIA. It is recommended</p>	<p>Noted. A detailed Construction Noise and Vibration management Plan will be prepared by the principal contractor in consultation with the acoustic consultant to ensure that the construction works do not result in any unreasonable noise impacts to surrounding development.</p>

<p>they be incorporated into a Construction Noise and Vibration Management Plan to be included as a condition of consent.</p>	
<p>The EPA was satisfied that appropriate justification was provided for Out of Hours Work (OOHW) in accordance with section 2.3 of the Interim Construction Noise Guideline (ICNG) (EPA, 2009). Activities outside standard hours are proposed to be restricted to: concrete finishing works (including the use of a Helicopter float); and the erection and installation of a stationary crane.</p> <p>It is the EPA's general understanding that the concrete finishing works would occur at a suitable time after concrete pouring which is scheduled to occur during standard construction hours (although this is not clarified in the acoustic report); while crane installation would likely occur at the commencement of construction, and presumably at completion to uninstall (again, this has not been clarified).</p> <p>The EPA notes that the acoustic assessment references two different time periods for Out of Hours Work being:</p> <p>'Outside Recommended Standard Hours' as:</p> <ul style="list-style-type: none"> • Saturday – 1 pm to 3 pm. <p>and 'Special Construction Hours of Work' as:</p> <ul style="list-style-type: none"> • Friday – 6 pm to 10 pm; • Saturday – 5 pm to 10 pm; • Sunday – 8 am to 5 pm; and • Sunday – 5 pm to 10 pm. <p>However, the time periods proposed are all considered to be outside standard construction hours in the ICNG. The same activities are proposed to be carried out during both of the above time periods, with a similar basis for justification. It is unclear why a distinction has been drawn between the 'Special Construction Hours' and the 'Outside Recommended Hours'. This should be clarified in the acoustic assessment to avoid confusion.</p> <p>The EPA understands that some details of work schedules cannot be determined until detailed design phase. However, more information should be provided regarding the duration of work, or number of weekends required for OOHW, or number of times that specific activities will occur out of hours.</p> <p>The EPA emphasises that the community will hear, and likely be affected by noise and vibration at different times during the construction of the project. It will be important to keep the community informed about construction activities as the project progresses, and to seek input to identify the community's preferences for mitigation, including work scheduling, and consideration of respite periods, and that this inform a Community Communication Strategy that is recommended to be included as a condition of consent.</p>	<p>The proposed construction hours have been categorised into 'recommended standard hours', 'outside recommended standard hours' and 'special construction hours' as the EPA guidelines adopt differing strategies for noise control depending on the predicted noise level at the nearest residences and the time of day. It is noted that the Saturday extended hours sought are 1pm – 5pm (rather than 1pm-3pm Saturdays)</p> <p>Accordingly, while the same works will be undertaken during the 'outside recommended standard hours' and 'special construction hours' the Acoustic Impact Assessment (submitted with the RTS response package in September 2020) has categorised these to appropriately assess the impact in accordance with the guidelines and at the relevant time.</p> <p>The works are minor and only required on a limited/ad-hoc basis and so exact identification of frequency and timeframes is not considered necessary. Further detail on the frequency and timeframe for works can be provided in the Construction and Environmental Management Plan prepared by the principal contractor prior to demolition and construction works occurring if required.</p>
<p>Further, the EPA recommends DPIE include a requirement to provide an Out of Hours Work Protocol (OOHWP) that clarifies the proposed work activities to be taken across</p>	<p>Noted. HI will review the draft conditions of consent issued by DPIE at the appropriate time.</p>

<p>different time periods with the aim to limit the noisiest works during the most sensitive periods (e.g. during evenings, Saturday afternoons and Sundays) as far as practicable, and in consultation with affected receivers. The OOHWP should also clearly identify what specific feasible and reasonable mitigation and management measures are to be adopted by the proponent to address exceedances of the Noise Management Levels identified in the Noise Assessment. The OOHWP should be incorporated into the recommended Construction Noise Management and Vibration Plan (CNVMP) as part of the Construction Environmental Management Plan in the conditions of approval.</p>	
<p>The EPA has no further comment regarding contamination.</p>	<p>Noted.</p>