

HEALTH INFRASTRUCTURE

Addendum Review of Environmental Factors

Broken Hill Key Worker Accommodation

25 September 2024

Version Number: 2



HI Planning Document Control

Version	Date	Author	Description	Reviewed by	Approved by
1	23 September 2024	Larissa Ozog	REF Addendum Template	Jasmine Soghomonian	Jasmine Soghomonian
2	25 September 2024	Larissa Ozog	RED Addendum Template	Jasmine Soghomonian	Jasmine Soghomonian

Declaration

This Addendum Review of Environmental Factors (Addendum REF) has been prepared for NSW Health Infrastructure (HI) and assesses the potential environmental impacts which could arise from proposed removal of one (1) additional tree as part of the Key Worker Accommodation (KWA) to be delivered at Broken Hill.

A REF for the KWA was endorsed by HI on 8/08/2024 (RE Approval No.09/2024). This Addendum REF has been prepared in accordance with the relevant provisions of *the Environmental Planning and Assessment Act 1979* (EP&A Act), *the Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Environmental Planning Policy (Transport and Infrastructure) 2021* (TI SEPP).

This Addendum REF provides a true and fair review of the activity in relation to its likely impact on the environment. It addresses to the fullest extent possible, all the factors listed in Section 3 of the Guidelines for Division 5.1 Assessments (June 2022), the EP&A Regulation and the *Commonwealth Environmental Protection and Biodiversity Conservation Act 1999* (EPBC ACT).

Based upon the information presented in this Addendum REF, it is concluded that, subject to adopting the recommended mitigation measures, it is unlikely there would be any (additional) significant environmental impacts associated with the activity. Consequently, an Environmental Impact Statement (EIS) is not required and this Addendum REF should be endorsed.

Declaration	
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Document Management, Tracking and Revision History

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Appendices

Appendix	Description	Author	Date
A	Updated mitigation measures	Larissa Ozog	23/09/2024
B	Arboricultural Risk Assessment	Arborcore Remote Tree Solutions	18/09/2024
C	Updated Architectural plans	Kearney Architects	20/09/2024

Abbreviations

Abbreviation	Description
AEC	Area of Environmental Concern
AHD	Australian Height Datum
AHIP	Aboriginal Heritage Impact Permit
AHIMS	Aboriginal Heritage Information Management System BC Regulation
AMG	Australian Map Grid
BC Act 2016	<i>Biodiversity Conservation Act 2016</i>
BC Act 2017	<i>Biodiversity Conservation Act 2017</i>
BC Regulation	Biodiversity Conservation Regulation 2017
BAM	Biodiversity Assessment Method
CA	Certifying Authority
CE	Chief Executive
CM Act	<i>Coastal Management Act 2016</i>
CMP	Construction Management Plan
CWC	Connecting with Country
CRA	Conservation Risk Assessment
DPC	Department of Premier and Cabinet
DPE	Department of Planning and Environment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EES	Environment, Energy and Science
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPBC Act (Cwth)	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EPI	Environmental Planning Instrument
EPL	Environment Protection License
FM Act	<i>Fisheries Management Act 1994</i>
Ha	Hectares
HHIMS	Historic Heritage Information Management System
HI	Health Infrastructure
LEP	Local Environmental Plan
LGA	Local Government Area
MPS	Multipurpose Service
MNES	Matters of National Environmental Significance

Abbreviation	Description
NorBE	Neutral or Beneficial Effect of Water Quality Assessment Guideline (2022)
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	National Parks and Wildlife Regulation 2009
NPWS	National Parks and Wildlife Service (part of EES)
NT Act (Cth)	<i>Commonwealth Native Title Act 1993</i>
OEH	(Former) Office of Environment and Heritage
PCMP	Preliminary Construction Management Plan
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Proponent	NSW Health Infrastructure
REF	Review of Environmental Factors
RF Act	<i>Rural Fires Act 1997</i>
RFS	Rural Fire Service
Resilience and Hazards SEPP	State Environmental Planning Policy (Resilience and Hazards) 2021
SEPP	State Environmental Planning Policy
SIS	Species Impact Statement
TI SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021
WM Act	<i>Water Management Act 2000</i>

Executive Summary

The REF for the construction of Key Worker Accommodation (KWA) at Broken Hill Hospital approved the installation of 20 modular housing units across two (2) accommodation blocks, site preparation works, tree removal, augmentation of site services and associated landscaping.

The proposed addendum seeks removal of an additional tree (Tree No.4) as identified on the Tree Location Plan (refer to **Figure 4**) which is in poor condition and is located too close to the subject works. An updated Arborist risk assessment accompanies this Addendum and is included at **Appendix B**. It is therefore requested to remove Tree No.4 and provide replacement planting in the form of an additional tree within the vicinity of the new works to cater for this loss. The accompanying and updated Arborist risk assessment justifies the removal of the tree given its poor health and presence of cavities in the branches and its location within the construction zone.

This addendum relies on the following plans which have been updated;

- Demolition Plan prepared by Kearney Architecture, dated 20 September 2024 project No.27075 Issue F
- Site Plan prepared by Kearney Architecture, dated 20 September 2024, project No.27075 Issue G
- Site Roof plan prepared by Kearney Architecture, dated 20 September 2024, project No.27075 Issue F

The proposed amendment is considered to be small-scale and substantially the same development.

There is no ecological or adverse environmental impact of the works and as such the Addendum should be endorsed.

1. Introduction

NSW Health Infrastructure (HI) proposes to amend the KWH development (the Proposal) at Broken Hill Hospital, located at 170-320 Thomas Street, Broken Hill (the site). This development is part of a larger program of works which aims to deliver and provide KWH accommodation at a number of regional hospitals and provide additional and much needed housing opportunities for health care professionals.

This Addendum Review of Environmental Factors (REF) has been prepared by Larissa Ozog on behalf of HI to determine any changes to the environmental impacts as identified within the REF No.09/2024 approved on 8 August 2024. For the purposes of these works, HI is the proponent and the determining authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The purpose of this Addendum REF is to describe the amended proposal, to document the likely altered impacts of the amended proposal on the environment and to detail any changes to the protective measures, identified in the REF, to be implemented to mitigate impacts.

The description of the additional proposed works and associated altered environmental impacts have been undertaken in the context of the Guidelines for Division 5.1 Assessments (June 2022), the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation) and the Australian Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The assessment contained within the Addendum REF has been prepared having regard to:

- Whether the amended proposed activity (the amended proposal) is likely to have a significant impact on the environment and therefore the necessity for an EIS to be prepared and approval to be sought from the Minister for Planning and Homes under Part 5 of the EP&A Act; and
- The potential for the amended proposed activity (the amended proposal) to significantly impact *Matters of National Environmental Significance* (MNES) on Commonwealth land and the need to make a referral to the Australian Government Department of Environment and Energy for a decision by the Commonwealth Minister for the Environment on whether assessment and approval is required under the EPBC Act.

The Addendum REF helps to fulfil the requirements of Section 5.5 of the EP&A Act, which requires that HI examine, and take into account to the fullest extent possible, all matters affecting, or likely to affect, the environment by reason of the proposed activity.

1.1 Amended Proposal need and Alternatives

After the KWH REF was approved the Project Team began detailing the works and found that Tree No.4 a Blackwood (*Acacia melanoxylon*) was located too close to the proposed works and will be impacted by construction activity. In addition, the Arborist risk assessment found the tree was in poor health with a number of cavities at the base of the tree. The most viable option is to remove the tree and provide replacement planting of a similar species in proximity to the works.

2. Site Analysis and Description

2.1 The Site and Locality

The approved activity is located at the Broken Hill Hospital at 170-320 Thomas Street, Broken Hill (refer to **Figure 1**). The hospital is located on Wilyakali Country. The hospital site comprises one lot, legally described as Lot 4376 DP 757298 and covers approximately 8.38ha. The proposed works are contained within an approximately 1,200m² area near the site's Morgan Street frontage (refer to **Figure 2**). The proposed accommodation is near several existing buildings on the hospital's upper campus, including the two-storey Kincumber House to the southwest, which is used for staff accommodation, and a single-storey heritage building used as a workshop store. The REF Activity Area is not occupied by existing development.

Vehicles access the Hospital's upper, northern campus using a driveway off Morgan Street or Bromide Street, while the lower campus is accessed via Thomas Street and Chloride Street.

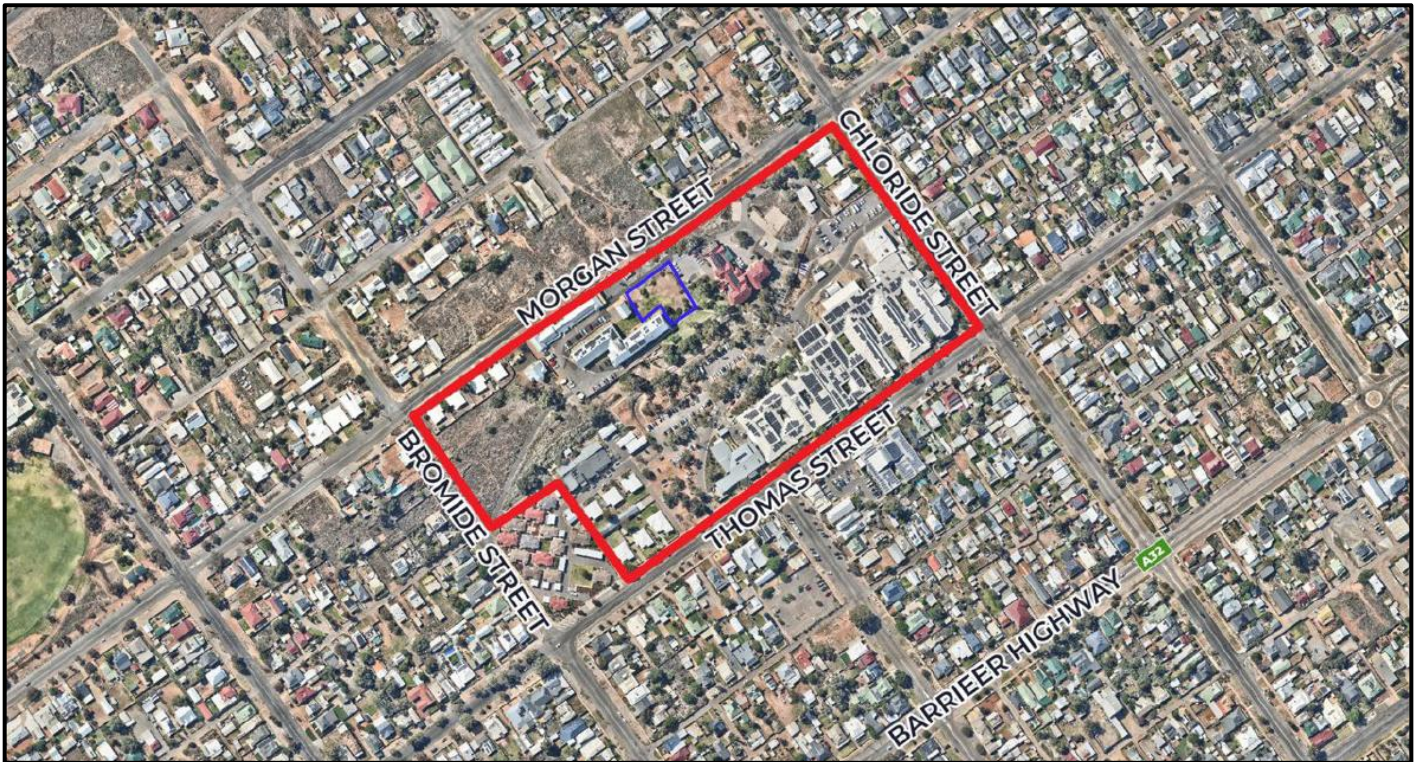


Figure 1: Boundaries of the Broken Hill Hospital site in red and the location of the KWH in blue.

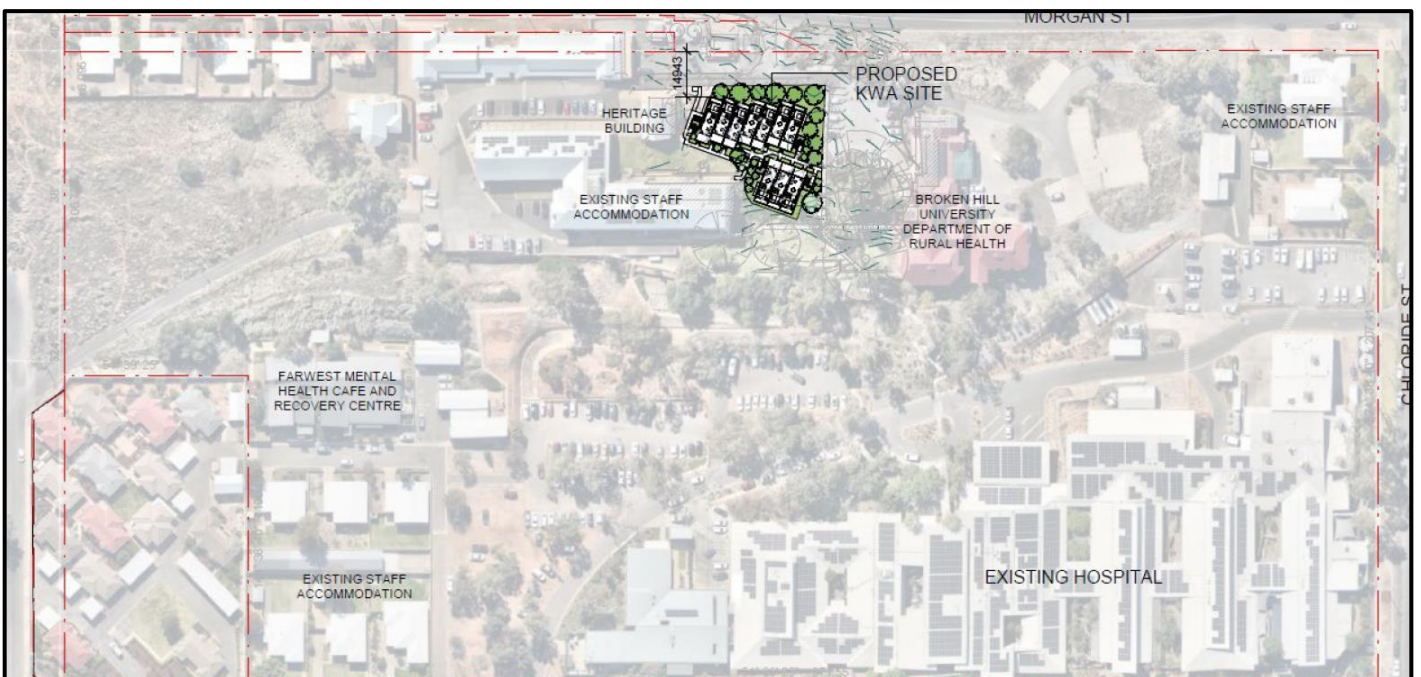


Figure 2: Northern section of the hospital site boundary showing a more detailed location of the proposed KWH.

2.1.1 Site Considerations and Constraints

Section 10.7 Planning Certificate No.18543 dated 23 May 2023 identifies that the site is located within the R1 General Residential zone under the Broken Hill Local Environmental Plan 2023.

Subject to the extent of time between the REF preparation and the preparation of this REF Addendum an updated 10.7 Planning Certificate was not considered to be required.

Table 1: Section 10.7 Planning Certificate

Affectation	Yes	No
Critical habitat		✓
Conservation area		✓
Item of environmental heritage	✓	
Affected by coastal hazards		✓
Proclaimed to be in a mine subsidence district		✓
Affected by a road widening or road realignment		✓
Affected by a planning agreement		✓
Affected by a policy that restricts development of land due to the likelihood of landslip	✓	
Affected by bushfire, tidal inundation, subsidence, acid sulphate or any other risk		✓
Affected by any acquisition of land provision	✓ The planning certificate notes that the land may contain level of heavy metals associated with Broken Hill being a mining town	
Biodiversity certified land or subject to any bio-banking agreement or property vegetation plan		✓
Significantly contaminated		✓
Subject to flood related development controls		✓

3. Proposed Amended Activity

3.1 Proposal Overview

The approved KWH REF at Broken Hill Hospital involved site preparation works, removal of seven (7) trees, the installation of 20 modular housing units across two (2) accommodation blocks, augmentation of site services and associated landscaping. **Figure 3** below shows the layout of the units at ground floor level.

The proposal involved the removal of seven (7) trees which were all assessed and considered as part of the original FREF assessment. In the detailed design phase, it was found that Tree No.4 which was to be retained will impact the construction zone and requires removal. Given the condition of the tree and its location removal is the most feasible option and replacement planting is proposed. The proposed location of Tree No.4 is shown in **Figure 4** below.

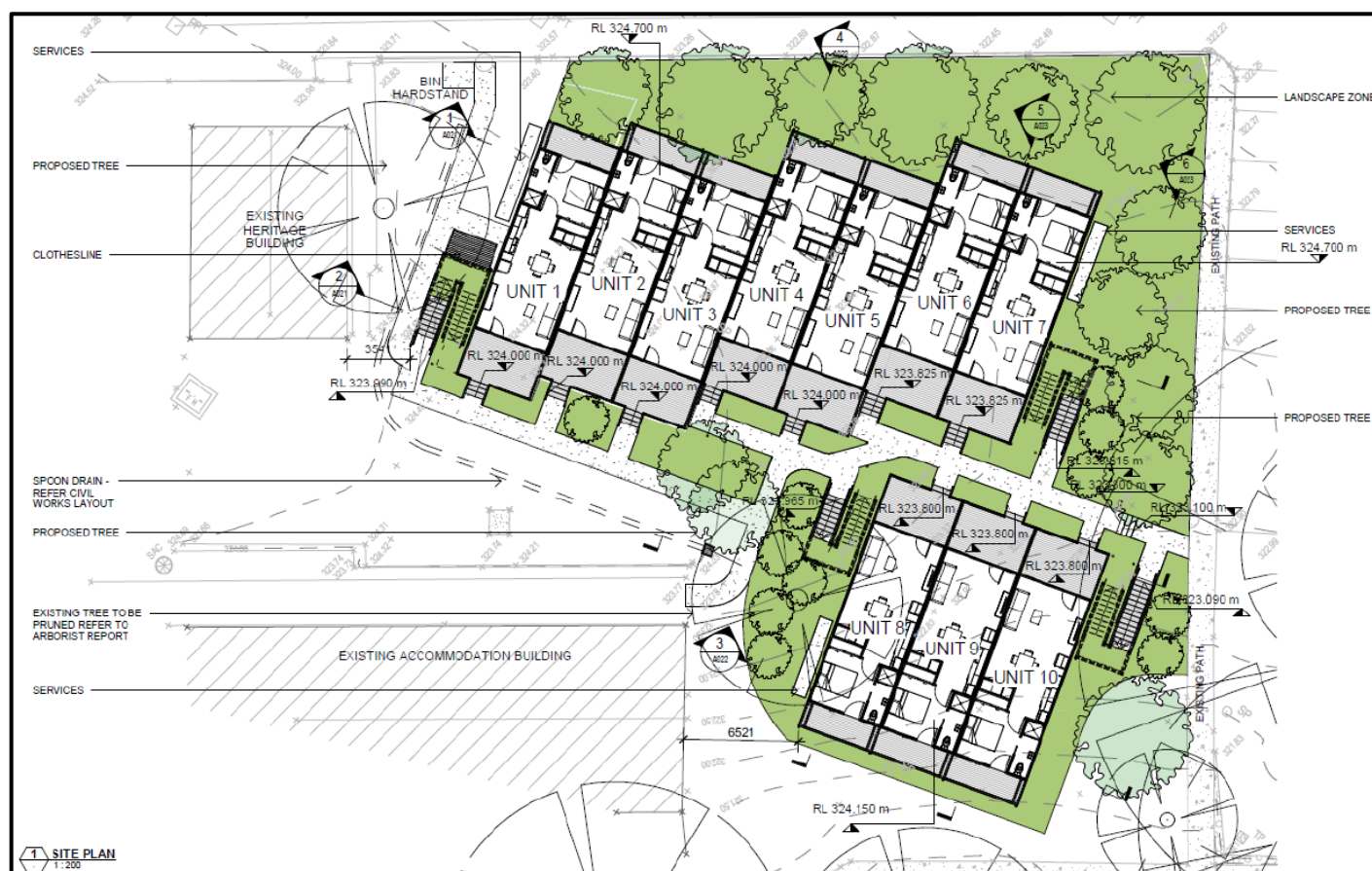


Figure 3: Approved ground floor layout of the proposed development.

The Arborist report which accompanied the REF prepared by Birds Tree Consultancy, dated 6 June 2024 assessed and considered the significance of all the trees within the immediate curtilage of the subject work site. It recommended that trees No. 3,6,7,8,9,12 and 13 are to be removed due to their location within the construction zone. Trees 1,2,4,5,10 and 11 are to be retained. The Tree location plan at **Figure 4** does indicate that the canopy of Tree No.4 (identified as a Blackwood (*Acacia melanoxylon*)) will be adversely affected by the location of the new staircase and KWH unit No.8. **Photos 1** and **2** show the tree and the cavities which are currently impacting the trunk of the tree and its longer-term health and longevity.

Arborcore Remote Tree Solutions were engaged to review and consider the risks involved in retaining the tree. The consultancy inspected the site on 17 September 2024 and prepared a risk assessment which found the following;

- On inspection cavities were found throughout the union of the tree;
- A significant branch had also failed and given this and the presence of cavities lends itself to a situation where the main leading branches will fail.
- The encroachment of the tree into the development zone will affect the Tree Root Zone.

The assessment recommends the removal of the tree to eliminate risk due to “the high level of branch and tree failure in a highly frequented area. Removal also recommended due to the development encroaching on the tree root zone causing further issues in the future”. The report recommended replacement planting in another area of the site.

This is considered a reasonable and justified response to remove the tree and provide replacement planting. The decision statement will be updated to include an amended demolition plan which will include the removal of the tree and associated plans ie site plan and will also update all mitigation measures to acknowledge the removal of this tree.



Figure 4: Tree Location Plan (courtesy: Birds Tree Consultancy, 2024)

The proposed modification to remove an additional tree does not affect the day-to-day operation of the hospital in any other way.

It is recommended that mitigation measure 2 be updated to cater for the change and to include a new mitigation measure 8.6 which is proposed to read as follows;

“Tree No.4 can be removed and shall be replaced by one (1) additional tree which shall be planted within proximity to the new KWA.A plan to show the location and type of tree shall be provided to the satisfaction of the Certifier.”

It is also suggested that mitigation measure 59 be updated to include reference to mitigation measure 8 and aims to read as below;

“Prior to the use of the facility, landscaping of the site in accordance with the landscape plans under mitigation measure 2 and measure 8 must be completed to the satisfaction of the Crown Certifier.”

These changes to mitigation measures are included as **Appendix A**.



Photo 1: Photo of Tree No.4



Photo 2: Photo of the existing cavities within the branches of Tree 4.

4. Statutory Framework

4.1 Environmental Protection and Biodiversity Conservation Act 1999

The provisions of the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) do not affect the proposal as it was not development that takes place on or affects Commonwealth land or waters. Further, it is not development carried out by a Commonwealth agency, nor does the proposed development affect any matters of national significance.

The amended proposal does not trigger any additional aspects of the EPBC Act.

4.2 Environmental Planning and Assessment Act 1979

Duty to Consider Environmental Impact

Part 5 of the EP&A Act applies to activities that are permissible without consent and are generally carried out by a public authority. Activities under Part 5 of the EP&A Act are assessed and determined by a public authority, referred to as the determining authority. HI is a public authority and is the proponent and determining authority for the proposed works.

For the purpose of satisfying the objects of the EP&A Act relating to the protection and enhancement of the environment, a determining authority, in its consideration of an activity shall, notwithstanding any other provisions of the Act or the provisions of any other Act or of any instrument made under the EP&A Act or any other Act, examine and take into account to the fullest extent possible all matters affecting or likely to affect the environment by reason of that activity (refer to Subsection 1 of Section 5.5 of the EP&A Act).

Section 171 of the EP&A Regulation defines the factors which must be considered when assessing the likely impact of an activity on the environment under Part 5 of the EP&A Act. Section 6 of this REF specifically responds to the factors for consideration.

Table 6 of the REF demonstrated the effect of the proposed activity on the matters listed for consideration in Subsection 3 of Section 5.5 of the EP&A Act. The proposal will not affect any Endangered or Threatened Species and there will be no impact on any vegetation at the site.

4.3 Environmental Planning and Assessment Regulation 2021

The Guidelines for Division 5.1 Assessments (DPE June 2022) provides a list of environmental factors that must be taken into account for an environmental assessment of the activity under Part 5 of the EP&A Act. These factors were considered in Section 6 of the original REF. This addendum does not add to the factors or create any new environmental factors that need to be considered.

In addition, Section 171A of the EP&A Regulation requires the consideration of the impact an activity in a defined catchment. This was considered in Section 4.5 of the REF. It is considered that these impacts do not require to be reassessed given the minor nature of the amendments.

4.4 Other NSW Legislation

The modification does not trigger assessment against any new legislation and existing legislation beyond that already considered under the REF.

5. Consultation

As previously mentioned, given the minor nature of the amendment no formal consultation or stakeholder engagement is required as the impacts of the modification are minor and will not alter the character and nature of the Hospital and the site area taken up by the KWA and will not adversely affect the immediate context of the site and its surrounds.

6. Environmental Impact Assessment

6.1 Environmental Planning and Assessment Regulation 2021 – Assessment Considerations

Section 171 (1) of the Environmental Planning and Assessment Regulation (2021) notes that when considering the likely impact of an activity of the environment, the determining authority must take into account the environmental factors specified in the environmental factors guidelines that apply to the activity.

The Guidelines for Division 5.1 Assessments (June 2022) apply to the activity. A comparison of the impacts of the proposal and the amended proposal against Section 3 of these Guidelines is provided below in **Table 2**.

Table 2: Summary of Environmental Factors Reviewed in Relation to the Activity

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(a) Any environmental impact on a community	The environmental impacts of the activity will be readily managed through the Construction Environmental Management Plan (CEMP) and will also increase landscaping across the site especially an increase in the amount of trees. The amendment will require an additional tree to be planted in lieu of the tree to be removed.	-ve		
		Nil		
		+ve	✓	✓
(b) Any transformation of a locality	The proposed accommodation is consistent with the scale and use of existing development at the Broken Hill Hospital. As such, it will not result in a transformation of the Broken Hill locality. The modification will not change this factor.	-ve		
		Nil	✓	✓
		+ve		
(c) Any environmental impact on the ecosystem of the locality	The Proposal will not result in a significant impact to any threatened species, ecological communities, or their habitats listed under the <i>Biodiversity Act 2016</i> or the <i>Environment Protection and Biodiversity Conservation Act 1999</i> .	-ve		
		Nil	✓	✓
		+ve		
(d) Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality	The proposal will deliver key health care worker accommodation on an existing health services site. The proposal will result in an improved aesthetic, recreational and environmental outcome for the locality The amendment will not alter this factor	-ve		
		Nil		
		+ve	✓	✓
(e) Any effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific, or social significance or other special value for present or future generations	The proposed activity will contribute positively to the Broken Hill locality. The proposed key health care worker accommodation has been designed to integrate with the Broken Hill Hospital's heritage and aesthetic significance The amendment will not affect this factor.	-ve		
		Nil		
		+ve	✓	✓
(f) Any impact on the habitat of protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)	No impact on the habitat of any protected species or existing vegetation and trees.	-ve		
		Nil	✓	✓
		+ve		
		-ve		

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(g) Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air	No impact to any endangered species, animal, plant or other form of life.	Nil	✓	✓
		+ve		
(h) Any long-term effects on the environment	The proposal will not have any adverse long-term effects on the biophysical environment. The change is minor and given the deteriorating health of the tree a young replacement species will provide better long term impacts to the site and its surrounds.	-ve		
		Nil	✓	
		+ve		✓
(i) Any degradation of the quality of the environment	No degradation to the quality of the environment is envisaged	-ve		
		Nil		
		+ve	✓	✓
(j) Any risk to the safety of the environment	No risk to the safety of the environment from the works	-ve		
		Nil	✓	✓
		+ve		
(k) Any reduction in the range of beneficial uses of the environment	There will be no reduction in the range of beneficial uses of the environment as a result of the proposed works. No change is proposed to the hospital operations.	-ve		
		Nil	✓	✓
		+ve		
(l) Any pollution of the environment	Appropriate construction mitigation measures have been implemented by the REF to ensure that the environment will not be polluted during construction.	-ve		
		Nil	✓	✓
		+ve		
(m) Any environmental problems associated with the disposal of waste	No additional waste removal or disposal is proposed by the changes.	-ve		
		Nil	✓	✓
		+ve		
(n) Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	The activity will maintain access to essential services and will not significantly impact demand for scarce resources.	-ve		
		Nil	✓	✓
		+ve		
(o) Any cumulative environmental effect with other existing or likely future activities	No cumulative environmental effects are envisaged	-ve		
		Nil	✓	✓
		+ve		
(p) Any impact on coastal processes and coastal hazards, including those under projected climate change conditions	The site is not affected by any coastal processes so this is not applicable to the addendum. No change or impact proposed.	-ve		
		Nil	✓	✓
		+ve		
(q) Any applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1	The activity as amended is consistent with the main strategic planning policies and controls. The small-scale change is in keeping with the strategic direction of the hospital and broader area.	-ve		
		Nil		
		+ve	✓	✓

Relevant Consideration	Response/Assessment	Impact	Proposal	Amended proposal
(r) Any other relevant environmental factors	Nil	-ve		
		Nil	✓	✓
		+ve		

6.2 Summary of Impacts

Any likely impacts relating to the amended proposal from those presented for the proposed activity (within the REF) have been considered and are discussed in **Table 3** below. All issues relating to the amended proposal are largely minor and will not cause significant impact as a result of the proposed activity. The originally approved mitigation measures relating to the project remain unaltered.

Table 3: Summary of Impacts relating to the activity (as amended)

Issue	Discussion
Visual Amenity	The amendment does not impact on the visual amenity and quality of the activity as the change will not affect the building envelope, footprint and architectural expression of the KWH accommodation.
Ecology	<p>The site is not mapped as containing any species of ecological or biodiversity importance (ie Endangered Ecological species or Threatened species) and appropriate protection measures have been implemented which will ensure any existing fauna will be managed and appropriately rehoused and sensitively relocated if nesting or living in existing trees to be removed. Trees not earmarked for removal will be appropriately protected.</p> <p>An ISA (TRAQ) Level 3 Risk Assessment is to be conducted including internal diagnostic testing to determine if Tree 1 identified in the Arboricultural Development Impact Assessment Report (dated 06/06/2024) has evidence of decay within the trunk, which places this tree at increased risk of failure. The proposed addendum does not affect this tree.</p> <p>All habitat is to be removed prior to demolition and is to be supervised by a suitably qualified Ecologist to ensure appropriate techniques are utilised. Any fauna injured during such activities should be transported to a veterinary clinic or taken by a Wires volunteer. This mitigation will remain and will be relevant to the proposed addendum.</p> <p>The addendum will retain the mitigation measures which ensure existing trees are protected and habitat is appropriately managed.</p>
Heritage	<p>The Broken Hill Hospital is identified as an item of local Heritage (I25) in accordance with Schedule 5 of the Broken Hill LEP. It is described as "Old areas of Broken Hill Hospital". The REF included a Statement of Heritage Impact prepared by OzArk Environment and Heritage. This assessment concluded that the KWA activity will have a 'minor or inconsequential impact' on the items within the Hospital campus.</p> <p>There will be no impact to the integrity and significance of the heritage items and associated existing buildings and broader campus.</p>

7. Summary of Mitigation Measures and Impacts

No additional mitigation measures are proposed in addition to the existing measures in the approved REF apart from reference to the plan numbers being updated. Updated mitigation measures which can update the Decision Statement is provided at **Appendix A**. An additional tree will need to be planted in lieu of Tree 4 to be removed.

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the amended proposal, it is determined that:

- The extent and nature of potential impacts are negligible, and will not have significant adverse effects on the locality, community and the environment;
- These identified impacts do not vary from those presented with the REF. Where these impacts vary changes to mitigation measures have been proposed.
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community; and
- Given the above, it is determined that an EIS is not required for the proposed development activity.

8. Justification and Conclusion

The amended proposal which forms part of the KWA REF at Broken Hill and seeks the removal of an additional tree (Tree No.4) as part of the works is subject to assessment under Part 5 of the EP&A Act. A REF for new KWA at Broken Hill Hospital was endorsed by HI on 8/8/2024. This small-scale Addendum REF has examined and taken into account to the fullest extent possible all matters affecting, or likely to affect, the environment by reason of the amended proposed activity.

As discussed in detail in this report, the amended proposal will not result in any significant or long-term impact. The potential impacts identified can be reasonably mitigated and where necessary managed through the adoption of suitable site practices and adherence to accepted industry standards.

As outlined in this Addendum REF, the amended proposed activity can be justified on the following grounds:

- It is consistent with and substantially the same as the works approved by the KWA REF;
- It generally complies with, or is consistent with all relevant legislation, plans and policies;
- It has considered all potential impacts (changed from those identified within the REF) and has minimal environmental impacts; and
- Adequate mitigation measures have been proposed to address these impacts.

The environmental impacts of the amended proposal are not significant and therefore it is not necessary for an EIS to be prepared and approval to be sought for the proposal from the Minister for Planning under Part 5 of the EP&A Act. On this basis, it is recommended that HI determine the amended proposed activity in accordance with Part 5 of the EP&A Act and subject to the adoption and implementation of mitigation measures identified within this report.