Emergency Services, Maintenance and Training Facility

Block 45 Section 3 Hume

Application for EIS Scoping Document

Prepared for:

Secure Aviation (holdings)

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1 Introduction

1.1 Project Background

Secure Aviation (Holdings) Pty Ltd and its sister company Forestrack Pty Ltd provide both airborne and ground based services to a range of emergency services and strategic response operations, forestry contracting and management services and education.

Growing demand for their services, particularly in the areas of fire-fighting and other emergency services, has meant that the business requires a strategic operations base at a suitable location within the ACT.

An application for the Direct Sale for the development of the site as their aviation and forestry base was submitted to the Environment, Planning and Sustainable Development Directorate (EPSDD) (application reference DS 2016–224).

Block 45, Section 3, Hume ACT was more recently identified to potentially be a suitable location for the purposes of developing a headquarters and operational base for this operation. This parcel of land is currently vacant land of sufficient size/proportion to accommodate the required uses, as well as being located strategically within the ACT to suit the locational requirements as home base for operations, as was described in the direct sale application and further detailed in this report.

The proposed development of the site will include the development of a number of buildings to accommodate the offices and training facilities of the operations base, as well as other ancillary/supporting buildings and infrastructure including storage facilities, hardstand areas for vehicle access/manoeuvring and car/truck/heavy machinery parking. The proposal also includes the establishment of a helicopter landing pad that will service the airborne activities of the business.

As part of the assessment of the application for a direct sale of the land, the Minister for Planning and Land Management (Mick Gentleman MLA) considered the potential impacts of the proposed development of the site.

The Minister decided that impacts related to matters such as **noise, associated hazards relating to the operation of aircraft from the site, as well as potential impacts on surrounding land uses** will need to be thoroughly investigated prior to any approval being granted.

Consequently, in accordance with Section 124 of the *Planning and Development Act* 2007 (PD Act), the Minister has declared that the impact track will apply to the development proposal, and an Environmental Impact Statement (EIS) is therefore required.

In order to undertake an EIS, the proponent is required to request a Scoping Document in accordance with Section 212 of the PD Act. This report fulfils the information requirements for an application to the ACT Government for a Scoping Document for an EIA as per the statutory requirements.

1.2 Purpose of This Report

In accordance with Section 127 of the PD Act, proponents of a project that trigger (or potentially trigger) an impact track assessment are required to complete an EIS, unless the requirement to complete an EIS is waived by other means (such as a Section 211 Exemption granted by the Minister; this is an unlikely outcome given the Minister has declared the project to be in the Impact Track).

Given the above, and in accordance with Section 212 of the PD Act, for an EIS to be completed a Scoping Document must first be issued by the Planning Authority. The Scoping Document sets out the matters that must be addressed in the EIS document before it can be considered complete.

This document has been prepared to support the request for a Scoping Document and responds to the requirements of Form 1M and the prescribed criteria/matters set out in the *Proponent's Guide to Environmental Impact Statements* (ACT Government 2017). The general content and structure of the report is described further below.

1.3 Structure of This Report

This report has been structured around the information requirements identified in the ACT Proponent's Guide and specifically the requirements in relation to applications for an EIS Scoping Document, including information on the natural conservation values of the site and the completion of a Preliminary Risk Assessment. The structure and general content of the report is summarised in Table 1 below.

WHERE THIS REPORT DIRECTLY RESPONDS TO THESE REQUIREMENTS OR OTHER SECTIONS OF THE GUIDELINES, THE TEXT FROM THE FORM OR GUIDELINES IS REPRODUCED IN COLOURED CAPITALISED TEXT.

Table 1 – Structure of this Report

Document Requirements:	In this report:
A statement outlining the objectives of the project and why it is needed;	Chapter 2.
Description of the nature/type of project proposed by providing location map(s) of the project site(s), preliminary design drawings and satellite/aerial photographs;	Chapters 3 and 4
A description of the natural conservation values of the site (based on the considerations listed in the Proponent's Guide)	Chapter 4
Assessment Track consideration, and confirmation of potentially applicable triggers for Impact Track Assessment	Chapter 5
A preliminary risk assessment (PRA) based on the guidance document attached to this form;	Chapters 6 and 7
A description of measures within the proposal that seek to avoid and minimise impacts on identified conservation values.	Chapter 8
Any decision made under the EPBC Act in relation to this proposal.	Chapter 910

2 Objectives and need

STATEMENT OUTLINING THE OBJECTIVES OF THE PROJECT AND WHY IT IS NEEDED

2.1 Objectives

The proposed acquisition of Block 45 Section 3 Hume is required by Secure Aviation and Forestrack for the establishment of a new headquarters and operations base in the ACT.

These facilities are considered necessary to accommodate the day to day business operations of the organisation. The proposed development of the site for these purposes would meet the needs of the business in providing light industry/general industry, emergency services support, strategic and operational support in the ACT.

2.2 Need

Establishing the organisation's headquarters and operations base within the ACT ensures that these assets and services will be locally available in a timely fashion in the case of emergency, terrorism or other tactical operation scenarios as well as provide the ACT with the ability to house and manage this highly skilled operation within the Territory's boundaries and economy.

An operation such as this provides unprecedented opportunities to ACT Government and Territory based Commonwealth agencies with cost-effective access to tactical, emergency and rapid response services and solutions as and when required.

This service will be available all year and at all times of the day and night as well as in all weather contexts. This service is currently not readily available from a local service provided with this level of access – and often the unique offering that the organisation brings is not available in Australia.

This consideration is very prudent when, for example, considering fire support.

The establishment of the proposed operation will result in access to locally based ground and aerial support services all year round and specifically outside the current, very short, fire season contract period. A local presence provides access to this service at no additional cost to the community but increases the security blanket generated.

2.3 Specialised Services

Forestrack holds contracts with the ACT Government for rapid fire response and other forestry related services. This relationship dates back from the clean-up of the 2003 bushfires. The company also holds substantial contracts with Forestry Corporation of NSW and major private forestry companies and are highly active in the forestry areas in regional NSW and around the ACT and southern NSW region.

Secure Aviation is presently also targeting larger Defence contracts around Australia and, when successful, will deliver and manage the work from its base in the ACT.

2.4 Employment opportunities and economic value to the ACT

The envisioned facility will initially employ 20 full time persons and numerous part time people (subject to contracts, tenders, training and employees that are showing substantial potential for growth) and controls the group's operations across Australia.

Many more economic connections and employment opportunities will be generated through the construction and establishment of this facility by using local contractors and services (where available).

3 Description of the project

DESCRIPTION OF THE NATURE OF PROJECT PROPOSED

3.1 Site Selection and Suitability

Acquiring Block 45 Section 3 Hume provides an opportunity to establish a new, purpose-built facility with road frontage and exposure to the Monaro Highway, Sheppard Street Hume and Lanyon Drive. The process behind the selection of this site and its suitability for the intended purpose and uses involved finding a site with the following key characteristics:

- Land with the correct zoning and locality to support the operation.
- Direct road access with a strong preference to be located close to a main/arterial road to facilitate good access for support and ground operations.
- Adequate land area to establish coordination and operations office, hanger space and storage for equipment and land based assets/resources, landing facilities and the like,
- Central location in relation to the ACT geographically to permit low response time targets,
- Location away from sensitive (primarily residential) receivers to minimise impacts from flight operations (although this is considered a relatively low impact use),

Block 45 Section 3 Hume was found to meet all of the above site requirements, being located close to Lanyon Drive and subsequently Monaro Highway, provides sufficient land area with manageable ecological constraints (as demonstrated in Section 4 of this report) to achieve the site building construction and operational requirements, is located centrally within the ACT (***Figure 1***). The site is also considered ideal in that it is located within the outer margins of the Hume Industrial Precinct, with (main) roads on all but one boundary, and therefore the operations are considered unlikely to affect any sensitive nearby users and provide approach-routes that can generally steer clear from build-up sites.

Its central location will also see an opportunity to have a response time of generally less than 10 minutes to the entire urban area of Canberra which is vital for the emergency service roles in particular that are proposed to be operated from the site.

In addition to the above, the close proximity of the site to the Canberra Airport (and the operation's tourism outlet) and its ability to have easy access and communication to the airport operations further enhances the suitability of this site in terms of air traffic safety.

3.2 Site location and Context

The site is identified as Block 45 Section 3 Hume and is located at the southwestern corner of Sheppard Street and Lanyon Drive (Figure 2).

Block 45 Section 3 Hume is zoned NUZ1 Broadacre and is subject to the Main Avenues and Approach Routes overlay in the ACT Territory Plan.

The proposed development and use of the site, as described below, are permissible uses in this zone under the Lite/General Industrial, Emergency Services Facility and Educational Establishment uses definitions in the Territory Plan.

The assessment track for a development application for any of these uses would ordinarily be a Merit Track assessment, however, as specified above, the proposal has been declared by the Planning Minister to be an Impact Track Assessment in accordance with Section 124 of the PD Act.

3.3 Land custodianship

Block 45 Section 3 Hume, subject to the application for a direct sale, is unleased land. It is identified in ACTmapi as being under the custodianship of TCCS for the purpose of *City Presentation*.

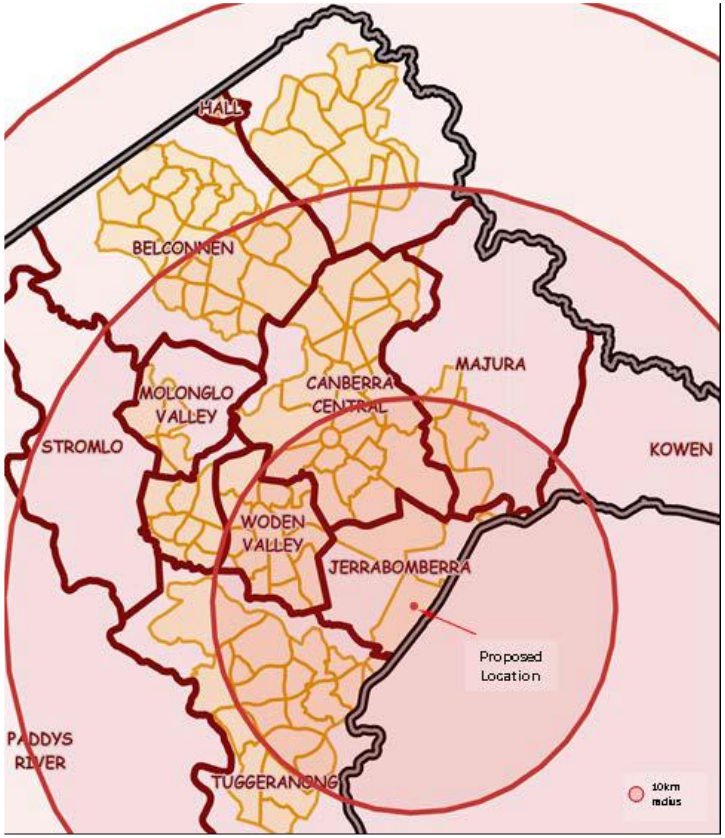

Figure 1 Site Locality

Figure 2 Subject Site – Block 45, Section 3 Hume

3.4 Intended use for Block 45

The proposal involves an application to purchase and develop land for the purposes of developing a base to provide support for emergency services, forestry and related services, educational institution and uses with ancillary uses supporting these functions.

Specifically, the services (air and ground) to be provided from the new headquarters will commonly relate to the following activities:

- Emergency search and rescue operations;
- Strategic and tactical operational support (Police);
- Airborne surveillance and airborne operations management support;
- Firefighting and tactical support relating to this activity;
- Community education;
- Helicopter maintenance and engineering services; and
- Forestry Site Preparation Services to Government and Private Forest Owners.

The flying of helicopters in an out of the site for the foreseeable future will primarily be to fly machines in and out for maintenance and refurbishment. This is expected to be at a maximum of 30-35 flights per month or an average 2 in-and-out flights per day on average.

Flight directions into and out of the site will generally be to/from a northerly and easterly direction (prevailing wind being considered).

3.5 Proposed Development of Block 45

The headquarters/operations base will be required to provide facilities for the Forestrack operations and Secure Aviation requirement including storage of secure (operational) equipment associated with tactical, security and police operations as well as a scalable areas and facilities (including storage and serving space) required for the mobilisation of assets and resources to support larger emergency operations and or situations when they arise (e.g. 2003 Canberra bushfires and 2019-2020 ACT and NSW fires).

Based on a preliminary concept plan for the site (Figure 3), the future development would (likely) involve the following features (including preliminary estimates of the development footprint for each element):

- 4,400m^2 of buildings for offices, training and associated uses,
- 3,600m^2 hardstand, for vehicle parking and manoeuvring,
- 3,000m^2 storage yard for Forestrack,
- 2,000m^2 (or thereabouts) Emergency Services Training Area,
- 7,600m^2 identified for future possible development (longer term planning to ensure site remains viable in a changing city, regional and global context).

*: Subject to DA

Some of the trees located in the north-eastern portion of the site will likely require removal to facilitate safe take-off and landing of aircraft, however it is expected that many of the existing trees could be retained.

Figure 3: Concept Plan of proposed development of Block 45 Section 3 Hume

4 Natural conservation values of the site

4.1 Biodiversity Values of the Site

A preliminary assessment of the biodiversity values of the site was completed in October 2018 by PATH-Co (Attachment 1). The assessment included a combination of desktop and field-based survey methods. A summary of the site's vegetation values and habitat for native fauna is provided below.

Vegetation

The vegetation at the site is characterised into two broad categories, being the cleared central parts of the site, and the outer eastern and northern portions of the site which retain a relatively intact native tree canopy, as described further below, and as shown in Figure 4.

Area 1: Southern portion of the site

The vegetation within the southern (and central) parts of the site 'Area 1' on Figure 4 is in a highly modified condition, being cleared of any native trees, and dominated by introduced grasses and numerous weed varieties, with a few (<10) small introduced/ornamental shrubs/saplings (such as apples/plums) observed to be scattered lightly through this area.

In general, there was very little native species observed in this central cleared areas, comprising (very) occasional native grasses such as Spear Grass (*Austrostipa spp.*), Poa (*Poa spp.*)and Common Wheatgrass (Elymus scaber) On the whole, exotic species were observed to account for well over 50% of the overall species composition in this area, and it would not qualify as being part of any threatened ecological community (see further below for details of listed threatened communities that were considered for possible occurrence at the site).

Area 2: Northern portion of the site

The northern portion of the site 'Area 2' supports a relatively intact native tree canopy, comprising two distinct, but contiguous patches with different species composition. The north, north-western parts of Area 2 which accounts for most of the trees at the site, supports a tree species composition of predominantly Brittle Gum (*Eucalyptus mannifera*) with some occasional Argyle Apple (*E. cinerea*), Red Box (E. polyanthemos) and very occasional Yellow Box (*E. melliodora*) individuals.

Figure 4. Vegetation category areas within the site

Given the observed typical age and size class (approx. 12-16 m height and on average less than 500 mm trunk diameters (dbh) even for large specimens), across Area 2 none of these trees are considered likely to be remnant trees (i.e. occurring pre-development of Canberra).

Many of these trees are likely to be planted specimens as noted from the ACTmapi Vegetation Communities layer database (based on the mapping of Baines et al, 2013) which identified the northern treed parts of the site as supporting *APN: Amenity planting native*. Given this, the treed parts of Area 2 would not naturally conform to any recognised vegetation community type.

Some of the younger trees at the site are likely to have naturally regenerated from the plantings or the soil seed bank from the former vegetation at the site, pre-clearing.

Almost all of Area 2 were observed to have a moderately modified understorey. The central and eastern parts of Area 2, and extending north to the intersection of Lanyon Drive and Sheppard Street, supported a relatively dense shrubby understorey, consisting primarily of Cootamundra Wattle (*Acacia baileyana*) and Wedge-leaf Wattle (*Acacia pravissima*) with some minor regrowth specimens of the eucalypt species mentioned above. Some (occasional) introduced exotic shrub varieties including Briar Rose (*Rosa rubiginosa*) and Hawthorn (*Cratageus spp.*) were also observed to be present. The other parts of Area 2 supported little or no shrubby understory layer.

The groundcover layers throughout Area 2 were observed to support predominantly introduced grasses and weed varieties, generally similar to those mentioned for Area 1 above, with very few native groundcover species observed in Area 2, including only a small number of Speargrass and Kangaroo Grass (*Themeda triandra*). Very few native forbs were observed in Area 2, including common varieties such as Native Geranium (*Geranium solanderi*) and Bluebells (Wahlenbergia sp.). As with Area 1, the exotic species accounted for well over 50% of the overall species composition in this area.

Threatened flora

There was no evidence of any local threatened flora species within the site.

A review of the ACTmapi Significant Species database also does not identify any records of any listed threatened flora as occurring either within or immediately adjacent to the site. With regard to threatened flora species included in the EPBC PMST results, given the previous clearing of large parts of the site, including the degree of weed infestation in the understorey layers throughout the site, as well as other features such as lack of suitable habitat for certain species, suggest that there is little potential of any of these species occurring at the site. Refer to Attachment 1 (Appendix B) for further information on the potential likelihood of threatened species occurring at the site.

Threatened ecological communities

The site does not support any identifiable threatened ecological communities.

A review of the ACTmapi Significant Species database also does not identify any listed threatened communities occurring in or near this area and as stated above, shows the treed parts the site as supporting *APN: Amenity planting native*.

The EPBC PMST revealed two listed threatened ecological communities that may have the potential to occur in the area, these include the following:

- White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland (critically endangered ecological community (CEEC) under the EPBC Act); and/or Yellow Box Red Gum Grassy Woodland (endangered ecological community (EEC) under the ACT NC Act); and
- Natural Temperate Grassland of the South Eastern Highlands (critically endangered ecological community (CEEC) under the EPBC Act); and/or Natural Temperate Grassland (endangered ecological community (EEC) under the ACT NC Act).

The highly modified nature of the open grassland areas across Area 1 which is dominated almost exclusively by introduced species means that this area would not qualify as being part of either of the communities listed above.

For Area 2,the woodland vegetation supports a canopy species composition dominated by Brittle Gum, as well as some Argyle Apple and Red Box (all of which appear to have been planted) and would not meet the definition of the White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland community (Box Gum Woodland) as per the criteria set out in the *EPBC Act Policy Statement: White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland* (DEH 2006).

Fauna and habitats

The fauna species encountered during the site survey, or considered likely to occur at the site on a regular basis, is limited mainly to common fauna types, as described below.

Avifauna

The avifauna species observed during the site survey included primarily common species that are well-adapted to urban and peri-urban environments, and are often seen throughout the ACT and surrounding region (refer to Section 3.2 of the Biodiversity Assessment report included at Attachment 1).

The northern parts of the site (i.e. Area 1) provides relatively good tree cover for shelter/resting/roosting habitat for birds, as well as some suitable foraging habitat for granivorous and nectivorous bird species though the (limited) variety of flowering trees and shrubs, and grasses (for seed-eating species).

No tree hollows were observed in any of the trees at the site, and so there is no suitable breeding habitat for any hollow-dependent bird species (although these species still may visit to forage at the site from time to time, as evidenced by the presence of Galahs and Rosellas for example).

Mammals

No mammals were directly observed at the site during the brief daytime inspection, although some evidence of mammals visiting the site was observed (by burrows and scats). The inspection noted that the site generally provided minimal suitable habitat features for native mammals as summarised below.

There was limited arboreal habitat features for native mammals. No tree hollows were observed in any of the trees, which is an important breeding habitat requirement for many native arboreal mammals, and consequently, the site is considered unlikely to support any breeding habitat for arboreal, hollow-dependent native mammal species.

The site provides limited habitat for native ground-dwelling mammals. This includes marginal foraging habitat for kangaroos and wombats for which there was some evidence of use at the site by observations scats as well as scratchings/diggings by these species. Other evidence of use of the site included scratchings made presumably by a Short beaked echidna (*Tachyglossus aculeatus*), as well as burrows and scats of the introduced European Rabbit (*Oryctolagus cuniculus*).

There are some rocky outcrops located along the northern margins of the site in Area 2, however, these rocks were typically heavily embedded with little crevices or other holes/burrows beneath the rocks observed which would limit their suitability as potential nesting habitat for any small mammals. No other suitable ground structures such as fallen logs, required for shelter for many smaller ground-dwelling mammals was observed and consequently, the site is considered unlikely to support any smaller native ground-dwelling mammal species.

Reptiles

The site provides some habitat for reptiles, limited mainly to the occurrence of the rocky outcrops mentioned above. As noted above, the majority of these rocky areas contained large heavily embedded boulders/bedrock, with fewer loose/partially embedded surface rocks. Consequently, there is limited opportunities for reptiles to shelter beneath these rocks (particularly for longer-term winter hibernation etc), although they do provide good basking habitat (an important requirement for many reptile species).

Targeted surveys were undertaken at the site for the Striped Legless Lizard (*Delma impar*). These surveys were undertaken in accordance with the *Commonwealth's Survey guidelines for Australia's threatened reptiles: Guidelines for detecting reptiles listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999* (CoA 2011) and which (preferentially) prescribes the use of the artificial shelter site technique.

The surveys involved the placement of roof tiles (as artificial shelter sites) in grids consisting of 50 tiles, at five metre spacing between tiles, arranged in a grid of 10 tiles by five. The guidelines prescribe as a minimum, two tile grids for sites less than 2 hectares in size, or one grid per 3 hectares for sites up to 30 hectares. For this study, three grids (totalling 150 roof tiles) were deployed within the open grassland areas across the south-western portion of the site.

The survey was undertaken from September to December, 2019.

During these surveys, the target species, D. impar, was not recorded at the site (or any other threatened reptile species), although a number of more common reptiles were recorded during the tile surveys, but in very low numbers. These included the Delicate Skink, *Lampropholis delicata* and Grass Skink, *L. guitchenoti*, Eastern Brown Snake *Pseudonaja textilis*, Boulenger's Skink *Morethia boulengeri* and Lined Skink *Ctenotus robustus*. A single Jacky Lizard *Amphibolurus muricatus* was also briefly glimpsed amongst a pile of broken concrete/rocks/rubble in the central western portion of the site and a single record was also made of a medium-sized Eastern Blue-tongued Lizard (*Tiliqua scincoides scincoides*) beneath rocks in the northern portion of the site.

Amphibians

The site does not support any regular or intermittent aquatic habitats. Consequently, the site does not support potential breeding habitat for any amphibians.

Threatened fauna

No threatened fauna species were recorded within the site during the survey.

As noted, targeted surveys for the Striped Legless Lizard were unable to locate the species at the site. Given the results of this survey combined with the site conditions and history of disturbance, including fragmentation from other areas supporting the species, it is considered highly unlikely that the Striped Legless Lizard would be present at the site.

A review of the ACTmapi Significant Species database also does not identify any habitat or records of any listed threatened fauna as occurring either within or immediately adjacent to the site. With regard to threatened fauna species included in the EPBC PMST results, given the habitat requirement of these species and the observed available habitats within the site, it is considered unlikely that any of these species would occur at the site on a regular basis, or would rely on the site for important habitat.

Further consideration of the habitat requirements and likely occurrence of threatened species the site is provided at Appendix B of Attachment 1).

4.2 Hydrology, including water flows

Site lies within the Jerrabomberra Creek catchment which is situated within the Symonston Hydrogeological Landscape (HGL) which extends from south of Hindmarsh Drive and to the east the boundary coincides with the ACT border. The HGL covers an area of 39 km^2 and receives 600 to 750 mm of rain per annum (ACT Government[1]).

The site is located approximately 250 m to the east of Jerrabomberra Creek with direct flow from the site to the creek not possible. There are no mapped watercourses or other depressions or drainage lines within the site that might contain intermittent water flows (Figure 5).

Surface flows and drainage would be primarily to south, southwest, and collected in the stormwater drainage systems of Sheppard Street.

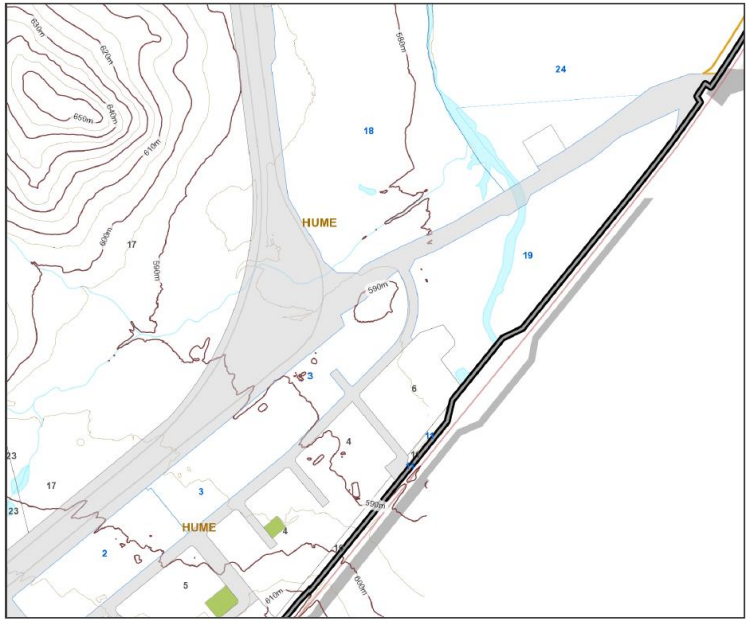

Figure 5. Waterways and Drainage lines in the local area (displaying ACT 2004 5m contour intervals)

(source: ACTMapi, 2018).

[1] http://app.actmapi.act.gov.au/Hydrogeological_Landscape_Reports/Reports/Salinity/24_Symonston_Salinity_160131.pdf

4.3 Soil and Geology

The Geology of the Canberra 1:100,000 Sheet Area[2] shows the site as being within the Canberra Block Formation, and identifies the majority of the site as consisting of tuff, tuffaceous sandstone, shale and ashstone which are part of the Laidlaw Volcanics Suite formed in the Mid-late Silurian age.

The Symonston HGL contains the Burra and Williamsdale soil landscapes. Within these soil landscapes, Red Chromosols and Red Kurosols (Red Podzolic Soils) and Red Kandosols (Red Earths) occur from crests to mid slope positions whilst Brown Chromosols (Yellow Podzolic Soils and Brown Kandosols (Yellow Earths) on better drained lower slopes and poorly drained Sodosols (Solodic Soils) in the lowest slope positions.

Due to sodicity, slope position and imperfect drainage the Sodosols have the greatest potential for land degradation and dryland salinity. However, in general there is little evidence of salinity in this HGL with the main areas of concern likely to be associated with the Jerrabomberra Wetlands and other low-lying poorly drained areas (ACT Government[3]).

4.4 Gradient

The site is relatively flat with a gentle slope to the south, southwest of about 5% fall from the low crest in the northern corner of the site (see Figure 5 for ACT 2004 5m contour interval map of the area). A short, steeper slope of generally up to 20% falls from the crest to the north, northwest along the block boundaries with Lanyon Drive and Sheppard Street.

The proposed development is located predominantly in the southern and western half of the site where slopes are less than about 5% and therefore are not a major concern for the proposed works .

4.5 Heritage

There are no Registered or Provisionally Registered Heritage Sites or any sites nominated for registration within or adjacent to the site (based on the ACTmapi Heritage layers, November 2018).

Given the site conditions and history of the area, it is considered unlikely that the site would support any heritage values of significance, however a heritage assessment of the site has not been conducted at the time of preparation of this application for a Scoping Document to confirm this opinion.

Figure 6 Heritage Sites in the locality

[2] Geology of the Canberra 1:100 000 Sheet area, New South Wales and Australian Capital Territory By Robert S. Abell 1991 AUSTRALIAN GOVERNMENT PUBLISHING SERVICE CANBERRA

[3] http://app.actmapi.act.gov.au/Hydrogeological_Landscape_Reports/Reports/Salinity/24_Symonston_Salinity_160131.pdf

4.6 Additional natural conservation values of the site

The following sections provide specific responses to the information requirements included in the *Proponent's Guide to Environmental Impact Statements* (ACT Government 2017) – "Preparing Information for Lodgement".

Existing processes and natural systems

IS THE LOCATION IMPORTANT IN MAINTAINING EXISTING PROCESSES OR NATURAL SYSTEMS OF THE ACT?

The site is not regarded as being important in maintaining any existing natural process or systems of the ACT.

The vegetation at the site is modified, being cleared and supporting predominantly weed groundcovers across the entire southern parts of the site, with the treed northern parts of the site identified as being (likely) planted (Amenity Planting). The vegetation does not meet the criteria for any listed threatened ecological community. Given the modified nature of the site, there is considered to be low potential for any listed threatened flora species to occur at the site, with no records of any listed threatened flora within or nearby to the site. In particular, consultation with Dr David Albrecht from the CSIRO Herbarium was made and it was his belief that *Dianella amoena* (a threatened species believed by ACT Government ecologists as having the potential to occur at the site/in the ACT; though not previously formally recorded here), is not likely to be present (in the ACT).

The site provides minimal habitat values for native fauna. There is some foraging habitat within the treed portions of the site which are used by more common and mobile fauna types, being mainly birds. No tree hollows or other nests were observed at the site. There is some marginal habitat for native reptiles provided by limited areas of rocky outcrops within the northern portions of the site, however, most rocks were heavily embedded, with few scattered surface rocks. A targeted survey for the Stiped Legless Lizard (Delma impar) was undertaken in Spring-Summer 2019, with a total of 150 roof tiles deployed in three grids (of 50 tiles) across the open grassland areas. The species was not detected during this survey, with only a few common reptiles recorded.

Based on the observations, the site is considered unlikely to support any listed threatened fauna.

The site is not considered to be important in maintaining any local or regional ecological corridors or links. It is located within the north-eastern corner of the Hume Industrial Area and surrounded by busy roads on all but one side, which bordered by a large warehouse on an industrial use site. The main links in the area occur well to the north of the site through the Jerrabomberra and Symonston reserves which would not be affected by development of this block.

No other important biotic or abiotic factures are known or considered likely to occur within or adjacent to the site that would be affected by its development.

Diversity of flora, fauna or landscape

IS THE LOCATION IMPORTANT IN EXHIBITING UNUSUAL RICHNESS OF DIVERSITY OF FLORA, FAUNA OR LANDSCAPES?

The southern half of the site is cleared and dominated by weeds and therefore is of low floristic diversity or value.

The northern treed parts of the site support a canopy of planted trees, consisting of only a few locally common species.

Other recorded native flora species in the understorey layers in the northern portion of the site were also of common varieties.

A total of 47 flora species were recorded at the site during the brief inspection, including only 12 native species and 35 exotic species.

There is considered to be low potential for the site to support any rare or threatened flora types (with *Dianella amoena* considered unlikely to be present as previously mentioned), and the vegetation does not meet any criteria for any listed threatened ecological community.

A total of 24 fauna species were recorded at the site during the brief site inspection. This included 15 birds (including one exotic species), three mammals (including one exotic species), and six reptile species.

All of the native species recorded are locally common species that are (moderately) well-adapted to urban environments.

As noted, despite targeted surveys being undertaken in accordance with prescribed survey guidelines for the Striped Legless Lizard, the species was not detected at the site and given the site conditions and history of disturbance (including fragmentation for many years from any nearby areas supporting the species), is considered unlikely to be present at the site.

Given the assessment findings, the site is not regarded as being important in displaying a rich or otherwise unusual fauna species diversity.

Additional targeted surveys for listed threatened flora or fauna are not considered necessary and it is unlikely that further survey would provide any notable new records or a change in the overall observed values of the site with regard to the diversity of native flora or fauna. The site also does not support any unusual landscapes, being relatively flat and situated within an industrial precinct and surrounded by busy roads and industrial uses. Development of the site (with the retention of some of the existing trees along the northern margins) would not diminish any existing landscape character or amenity values in the area.

Uncommon communities, landscapes or phenomena

IS THE LOCATION IMPORTANT IN ITS POSSESSION OF UNCOMMON, RARE OR ENDANGERED FLORA, FAUNA, COMMUNITIES, NATURAL LANDSCAPES OR PHENOMENA?

The site does not support any listed threatened or otherwise uncommon ecological community. The treed portions of the site are (most likely) of planted origin (as per ACTmapi website), and does not meet the criteria for the Yellow Box – Blakely's Red Gum Tableland Grassy Woodland ecological community.

The site does not provide any notable landscapes or scenic amenity of significance.

Some visual amenity values are provided by the existing trees across the northern portion of the site which fronts Lanyon Drive and Sheppard Street and forms the outer north-eastern "corner" of the Hume Industrial Area, and currently provides some limited visual buffering to the individual precinct from only a small number of viewpoints from the north (i.e. only the last short section of Lanyon Drive, and first short section of Sheppard Street before/as rounding the bend, as well as limited sections of Monaro Highway southbound).

No other rare or uncommon natural process or phenomena is known or considered likely to occur at the site.

Landscape and ecosystem characteristics

IS THE LOCATION IMPORTANT IN DEMONSTRATING THE PRINCIPAL CHARACTERISTICS OF THE RANGE OF LANDSCAPES, ENVIRONMENTS OR ECOSYSTEMS, THE ATTRIBUTES OF WHICH IDENTIFY THEM AS BEING CHARACTERISTIC OF THEIR CLASS?

The site is not considered important in demonstrating the principal characteristics of any landscapes, environments or ecosystems. It is typical of the modified landscape of the broader area and does not support any noteworthy attributes that would be characteristic of any important class of vegetation, ecological community or other landscape function or value.

Consequently, it does not represent an area whose conservation would be important as a demonstration of a particular natural resource in the ACT.

Information resource

IS THE LOCATION IMPORTANT FOR INFORMATION CONTRIBUTING TO A WIDER UNDERSTANDING OF THE ACT'S NATURAL HISTORY, BY VIRTUE OF ITS USE AS A RESEARCH SITE, TEACHING SITE, TYPE LOCALITY, REFERENCE OR BENCHMARK SITE?

The site is not considered important for providing information contributing to a wider understanding of the ACT's natural history, by virtue of its use as a research site, teaching site, type locality, reference or benchmark

5 Impact Track Assessment

The project has been declared by the Planning Minister under Section 124 of the PD Act to be in the Impact Track and require the completion of an EIS. Notwithstanding, other Impact Track assessment triggers may still apply to the proposal, summarised below.

There are 5 types of development application that are required to be assessed in the Impact Track; all of these are required to be accompanied by a completed EIS (or be exempted from this requirement by the Minister). These 5 types are listed in the relevant zone development table and are discussed below with relevance to the proposal.

Table 2 – Development types required to be assessed in the impact track

Development	Commentary
1. A development that is not an Exempt, Code Track or Merit Track development where the development is allowed under an existing lease.	**Not applicable.** The development would ordinarily be a Merit Track Assessment proposal under the relevant IZ1 zoning development assessment table (on the assumption a lease granted for the intended use upon completion of the direct sale application). The Ministerial EIS declaration over-rides this requirement.
2. A development that would be permissible under the National Capital Plan but which is identified as prohibited development in the relevant zone Development Table.	**Not applicable.** The proposed development is not prohibited by the Territory Plan **HOWEVER,** The Ministerial EIS declaration over-rides this requirement.
3. Development specified in Schedule 4 of the Planning and Development Act 2007 and not listed as prohibited development in the relevant zone Development Table.	**Not applicable.** The proposal would not trigger an Impact Track assessment under the criteria prescribed in Schedule 4 of the PD Act as demonstrated in Table 33 below **HOWEVER,** The Ministerial EIS declaration over-rides this requirement.
4. Development declared under Section 123 and Section 124 of the Planning and Development Act 2007 and not listed as prohibited development in the relevant zone Development Table.	**Applicable.** The proposed work is not listed as prohibited in the IZ1 zone development table **HOWEVER** the Minister for Planning made a declaration under Section 124 of the Act that the proposal is to be assessed in the Impact Track.
Any development not listed in the relevant zone Development Table	**Not applicable**

The intended development is identified as including Industrial use, an Emergency Services Facility, Educational Establishment and Ancillary Uses. These development types are permissible subject to a Merit Track assessment as depicted in the NUZ1: Broadacre Zone development table; **HOWEVER,** The Ministerial EIS declaration over-rides this requirement.

With consideration of potentially relevant Impact Track Assessment Triggers under Schedule 4 of the PD Act, it is noted that under Part 4.2 *Development proposals requiring EIS — activities*, Item 4 may potentially apply.

Under Item 4, an EIS is required for:

> *…proposal for construction of an airport or airfield (other than a helicopter landing facility used exclusively for emergency services purposes, including medical evacuation, fire fighting, retrieval or rescue)*

The proposal is not for an airport or airfield and no public passenger service and/or commercial freight collection will be undertaken at the site; it will not be registered as an airport for civil aviation operations. The proposed use involve an industrial type use relating to helicopter operations (maintenance/servicing), actions that is specifically exempt from the Schedule 4(4.2)(4) trigger as listed above.

With regard to potentially relevant environmental triggers for an EIS from Schedule 4, Part 4.3 for *Development proposals requiring EIS — areas and processes,* one potential trigger is identified, as summarised in Table 3 below.

Table 3 - Potential EIS triggers: Areas and Processes

	Trigger	Commentary
1	proposal that is likely to have a significant adverse environmental impact on 1 or more of the following, unless the conservator of flora and fauna produces an environmental significance opinion that the proposal is not likely to have a significant adverse environmental impact: (a) a species or ecological community that is endangered; (b) a species that is vulnerable; (c) a species that is protected; (d) a species with special protection status; (e) a species or ecological community if a threatening process has been declared under the Nature Conservation Act 1980, s 38 (4) in relation to the species or community; (f) a species or ecological community if the flora and fauna committee has stated criteria for assessing whether the committee should recommend the making of a declaration under the Nature Conservation Act 1980, s 38; (g) an endangered species, …, if the potential impact of the proposal will be on the species or community in New South Wales	Not Triggered A biodiversity assessment of the site has been undertaken by a qualified ecologist to support the project. The site assessment has concluded that the site is unlikely to support any listed threatened flora or fauna or ecological community that would be likely to be significantly adversely affected by the development. In particular, a targeted survey for the Striped Legless Lizard (*Delma impar*) was undertaken through Spring-Summer 2019 and failed to detect the species. This result combined with the site's small size and relative isolation suggest the species is unlikely to be present at the site. Consultation with Dr David Albrecht from the CSIRO Herbarium has also confirmed that *Dianella amoen*a is unlikely to (naturally) occur in the ACT,No other known listed threatened species in the local area is considered likely to be significantly adversely affected by the proposed helicopter operations of the site. Based on these conclusions, the project is not believed to trigger an EIS on this particular item.
2	proposal involving— (a) the clearing of more than 0.5ha of native vegetation ... unless the conservator of flora and fauna produces an environmental significance opinion that the clearing is not likely to have a significant adverse environmental impact; or (b) the clearing of more than 5.0ha of native vegetation on land that is designated as a future urban area under the territory plan unless the conservator of flora and fauna produces an environmental significance opinion that the clearing is not likely to have a significant adverse environmental impact.	**Possible** The subject site supports areas that would meet the definition of Native Vegetation under the Nature Conservation Act. This includes the treed areas across the northern half of the site which comprise predominantly native trees. Some of these trees are proposed to be removed for the helipad as well as to ensure a safe take-off and landing angle above the treed areas in the eastern portion of the site.. Based on the project design, it is possible that up to about 1,000m² of this vegetation could be removed, and therefore this trigger would not apply. In general, all attempts will be made to minimise the extent of tree removal and it is expected that this 0.5 ha threshold trigger can be avoided.
3	proposal for development on land reserved under s315 for the purpose of a wilderness area, national park, nature reserve or special purpose reserve, unless the conservator of flora and fauna produces an environmental significance opinion that the proposal is not likely to have a significant adverse environmental impact	Not Triggered The site is not located in on reserved land under s315 of the PD Act.

4	proposal that is likely to have a significant adverse environmental impact on— (a) a domestic water supply catchment; or (b) a water use purpose mentioned in the territory plan …; or (c) a prescribed environmental value mentioned in the territory plan … of a natural waterway or aquifer	Not Triggered The proposal will not be a significant water user or generator of additional runoff. Nor is it likely to have a significant impact on water quality.
5	proposal that is likely to result in environmentally significant water extraction or consumption, other than a proposal for an urban lake, pond or retardation basin or a wastewater reuse scheme— (a) in an existing urban area or on land that has been designated as a future urban area; and (b) that is designed in accordance with the water sensitive urban design general code under the territory plan	Not Triggered The proposal will not be a significant water user.
6	proposal that is likely to have a significant adverse impact on the heritage significance of a place or object registered under the Heritage Act 2004, unless the heritage council produces an environmental significance opinion that the proposal is not likely to have a significant adverse impact	Not Triggered The proposal is not likely to have a significant adverse impact on any registered place or object.
7	proposal involving land included on the register of contaminated sites under the Environment Protection Act 1997	Not Triggered The site is not included on the register of contaminated sites.
8	proposal, other than on land in an existing urban area or land that is designated under the territory plan as a future urban area, with the potential to adversely affect the integrity of a site where significant environmental or ecological scientific research is being conducted by a government entity, a university or another entity prescribed by regulation	Not Triggered The site is not being used for any research purpose.

6 Preliminary risk assessment

6.1 Methodology

Central to the assessment process is the consideration of whether the project is likely to cause a significant adverse environmental impact. This is irrespective of the scale, or type of development and is undertaken by considering the likely impacts from the project in the context of a project impact risk assessment matrix.

The matrix methodology outlined below has been adopted from The ACT Government's Proponent's Guide to Environmental Impact Statement (EPSDD, 2017). It is consistent with AS/NZS ISO 14004:2004 (environmental management systems) and AS/NZS ISO 13000:2009 (risk management).

In identifying possible impacts of a project, the consideration must be given to all of the likely activities that will be involved across all stages/timeframes, including the construction, operation and decommissioning, including both direct and indirect impacts.

6.2 Identifying possible impacts

The possible impacts associated with the project have been identified using a number of resources including the Ministerial trigger advice received, commissioned assessments by environmental and noise consultants, information on operational parameters provided by the proponent, reviews of available information by desktop assessment including ACTmapi and other databases, and early consultation with agencies.

6.3 Significant environmental impact

The interpretation of significance is context dependent and relative to multiple elements (e.g. spatial, temporal, cultural, ecological, social, economic or institutional). Section 124A of the Planning and Development Act provides guidance on how the significance of an adverse impact is to be determined for the purposes of the Act. Section 124A states:

An adverse environmental impact is significant if—

- the environmental function, system, value or entity that might be adversely impacted by the development proposed is significant, or
- the cumulative or incremental effect of the development proposed might contribute to a substantial adverse impact on an environmental function, system, value or entity.

In deciding whether an adverse environmental impact is significant, the Minister must consider the following:

- the kind, size, frequency, intensity, scope and length of time of the impact
- the sensitivity, resilience and rarity of the environmental function, system, value or entity likely to be affected.

The consideration of 'significance' is relevant as the assessment of potential impacts is appropriately focused on impacts that are potentially significant.

6.4 Evaluating likelihood

The likelihood of an impact occurring is best described in terms of probability. Overlaying this is the need to recognise the uncertainty that may be associated with potential impacts, particularly during the preliminary risk assessment process. Best practice dictates that where there is scientific uncertainty, a cautious approach is warranted which will in turn identify a higher level of risk.

Each identifiable potential impact can be assigned a likelihood between 'remote' and 'almost certain'.

Table 4 identifies the criteria used to determine the likelihood of an impact.

Table 4 - Description of likelihood

Likelihood	Description	Probability
Remote	May occur in exceptional circumstances	<1%
Unlikely	Not expected to occur in most circumstances	1-20%
Possible	May occur	21-49%
Likely	Probably will occur	50-85%
Almost Certain	Expected to occur	>85%

6.5 Evaluating consequence

The consequences of an impact require a degree of subjective assessment as they may consist of several elements.

For the purpose of the preliminary risk assessment the elements considered are described in Table 55 and Table 66. Several of the elements are interrelated and a consequence is considered to be major if any one of the elements can be expected to be a major impact. A subjective decision is needed for each possible impact as to the level of consequence taking a balanced view of the impact against each of the elements.

The consequence of an impact used in the risk assessment is the reasonably foreseeable consequence. If there is a large amount of uncertainty, then the consequence may be worse.

Table 5 - evaluating consequence (General Elements)

Element	Criteria	Description
Magnitude	Spatial	The area over which the impact will occur, from square metres to square kilometres.
	Intensity	The level of impact within the spatial area, from minor disruption to total destruction. A low intensity impact over a large area could be worse than a high intensity impact in a small area, depending upon other elements.
Temporal	Duration	The length of time of the impact, from a single event to a permanent change.
	Timing	Short term events may create significant impacts if they occur often. They may also coincide with particularly sensitive times in the receiving environment such as breeding cycles.
Ecological	Values	The quality of the receiving environment, generally identified through the declaration of conservation areas, identification of protected species and other features of natural conservation value.
	Sensitivity	The capacity of the receiving environment to regenerate or adapt to the impact (resilience). The sensitivity of an environment to a potential impact will require informed judgement.
Social	Number of people	The number of people/places directly or indirectly affected through lost opportunities for enjoyment or other values such as equity or existence values.
	Heritage	The impact on known or possible items of heritage or cultural value.
	Political	The measure of the likely political implications or level of community interest.
Economic		The financial cost of the impact through lost productivity or the cost of remediation.

Table 6 - Evaluating consequence (Examples of Project specific elements)

Consequence	Minimal	Minor	Moderate	Major	Catastrophic
Magnitude					
Spatial	A single point	Less than half a hectare	More than half a hectare, but less than 20	More than 20 hectares	Hundreds of hectares
Intensity	Low level behavioural, lifespan or condition effect	Acute impacts on some species	Moderate impacts on growth, recruitment or survival rates	Lethal impacts on some species	Lethal for individuals or communities
Temporal					
Duration	Single incident or transient event	Short term impact, single generation	Medium term	Long term, multiple generations	Permanent
Timing	Occurs outside breeding times	Occasional interruption of feeding or breeding	Interrupts one life cycle	Regularly interrupts life cycle	Permanent interruption of life cycle
Ecological					
Values	Previously disturbed areas	Parkland	Nature conservation area	Conservation area, listed species or other conservation feature of ACT significance	Wilderness, nationally threatened species or other conservation feature of national significance
Sensitivity	Will recover completely	Will recover with some changes	Moderate change to ecosystem functioning	Significant change to ecosystem functioning	Will not recover
Social					
Number of people	Some people indirectly impacted	Some people directly impacted or several indirectly	Several people directly impacted or many indirectly	Large number of people directly impacted or a small number of people heavily impacted	Loss of life /large number of people heavily impacted
Heritage	Impact on item of minimal significance	Impact on multiple items of low significance	Impact on significant item	Impact on multiple significant items	Major impact on protected item
Political	Single negative press article or well informed public event	Multiple negative press articles or well informed public events	Significant public interest and ongoing, well informed public interest	Public interest that leads to an inquiry	Change of government
Economic					
	Minimal losses	Several thousand dollars lost revenue or remediation costs	Half million dollars in lost revenue or remediation costs	One million dollars in lost revenue or remediation costs	Several million dollars in lost revenue or remediation costs

Based on the assessment of likelihood and consequence as described above, any foreseeable impact can be assigned a risk rating.

Table 7 illustrates the risk rating process as a matrix. Increased consequence from left to right and increased likelihood from top to bottom. The resulting juncture of consequence and likelihood produces the risk rating on a scale of negligible to significant.

Table 7 - Risk assessment matrix

Consequence	Minimal	Minor	Moderate	Major	Catastrophic
Likelihood					
Remote	Negligible	Negligible	Very low	Low	Medium
Unlikely	Negligible	Very low	Low	Medium	High
Possible	Very low	Low	Medium	High	Very high
Likely	Low	Medium	High	Very high	Significant
Almost certain	Medium	High	Very high	Significant	Significant

7 Project risks considered

The potential project risk and areas of impact considered in this assessment include (in no particular order):

1. traffic and transportation
2. utilities and infrastructure
3. materials and waste
4. landscape and visual impacts
5. soils and geology
6. water quality and hydrology
7. climate change and air quality
8. noise, vibration and lighting
9. biodiversity and nature conservation
10. aboriginal and cultural heritage
11. social
12. health
13. Economic impacts

The unmitigated risk associated with project on each of these factors are addressed in Table 8.

Table 8 - Unmitigated Risk Assessment

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
	Road Traffic and Transportation				
1	Transport – damage to road infrastructure by construction or delivery vehicles.	While some machinery will be brought to site for civil works these are unlikely to exceed the bearing capacity of the existing roads, given the relatively small area/scale of built form, and the relatively level nature of the site requiring minimal earthworks. The local road network already frequently accepts large heavy vehicles given the existing industrial uses of the Hume precinct. As such, impacts to roads are considered likely to be minor in nature. All vehicles attending the site will be road registered and of a type/class that is permitted to use the road network surrounding the site.	Possible	Minor	Low
2	Traffic – increased traffic, delays and road safety issues.	There will be a minor increase in road traffic during construction related to material delivery and construction workers. Once constructed, the operational traffic requirements of the development are likely to be in line with the use of the land for industrial type uses. This level of traffic is not expected to cause any notable delays or adverse impacts to existing traffic users in the local area – addressing this matter is required by legislation by consideration in Merit Track Development Proposals and will be assessed as part of the Development Application for the site. Given the low speeds of the local roads, as well as improvements to nearby intersections at Sheppard Street and Lanyon Drive, as well as adequate sightlines, there are no obvious traffic safety issues associated with the proposed development of the site. Finally, as the proponent is proposing to relocate to the site it is likely that not net increase in traffic associated with the proponents activities would occur.	Possible	Minor	Low

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
3	Traffic safety - Distraction to motorists from helicopter take-offs and landings	Helicopter taking off and landing at the site will be visible to motorists travelling along the western end of Lanyon Drive and northern end of Sheppard Street as well as vehicles travelling south along Monaro Highway, between the AMC and the Lanyon Driver intersection, including through and shortly after the intersection. Motorists travelling eastbound along Monaro Highway approaching the intersection may have some limited views, although existing trees in the median strip (which will grow further over time) and warehouse buildings, combined with take-off and approaches generally being to the northeast and away from drivers, mean that views from this section of road will be limited/restricted. Some screening vegetation along the outer margins of the site as well as driver adaptation to the presence of helicopter and the typically infrequent/low volume of flights would limit the magnitude and frequency of potential impacts. The major intersection to the immediate north of the site will result in traffic frequently slowing down in this area. Reducing/slowing vehicle speeds may assist in limiting distraction or severity of crashes if they occur. The instance of similar activities is well established at Block 16 Section 18 Hume (nearby and to the north of the site). We are not aware of any specific instances where the flight operations from that land caused traffic safety considerations within the adjoining road network. The low frequency of operation is unlikely to cause significant impacts on the road network and the safe use there-off.	Unlikely	Major	Medium
	Utilities and infrastructure				

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
4	Energy (electricity & gas) – excessive demand for energy during construction and operation	The total demand for energy during the construction is not expected to be excessive given the relatively small scale of development, involving mainly an office and training building, with some associated hardstand and storage structures. Energy demands during operation are also not anticipated to be excessively high, with the base expected to (typically) support at full capacity up to 30 full-time staff on a regular/daily basis, and up to 20 visitors at any one point in time (including part-time staff, contractors and customers) and on a less frequent. The anticipated servicing needs would be in line to what would be needed to establish an industrial use on the land that is similar to other industrial uses in the Hume precinct. Addressing this matter is required by legislation and assessed during the Development Application process. The existing electricity network is expected to be able to cater for this demand comfortably without any need for augmentation for increased delivery/supply demands.	Unlikely	Minor	Very Low
5	Mains Water – excessive consumption during construction or operation	The total demand for mains water supply will increase as a result of the development however the level of consumption will be in line with that of a typical commercial nature for uses supporting similar numbers of residents/staff and will be in line to what would be needed to establish an industrial use similar to other industrial uses in the Hume precinct. Addressing this matter is required by legislation and assessed during the Development Application process. The existing main water supply network is expected to be able to cater for this demand comfortably without any need for augmentation for increased delivery/supply demands.	Unlikely	Minor	Very Low
6	Stormwater – pollution of stormwater	Construction will not require the use of any known (or otherwise significant) potential pollutants. During construction, sediment and erosion is considered the most likely risk to stormwater quality, however given the relatively flat nature of the site and minimal earthworks requirements, as well as low overall block ratio of impermeable to permeable surface areas, the volumes and quality of stormwater that could leave the site are not expected to present any notable concerns. During operation, the site will provide some emergency services training. This could involve the use of some fire retardants which may contain chemicals that could pollute stormwater systems.	Possible	Moderate	Medium

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
7	Stormwater – inadequate flood contingency arrangements	Significant rainfall events during construction could lead to uncontrolled release of stormwater from site, although given the relatively flat nature of the site and minimal earthworks requirements, as well as low overall block ratio of impermeable to permeable surface areas, the volumes of stormwater that could leave the site are not expected to be large.	Possible	Minor	Low
8	Sewerage – inappropriate management	Sewerage connections for the office and training building will (need to) meet Icon Water requirements. The anticipated servicing needs would be in line to what would be needed to establish an industrial use on the land that is similar to other industrial uses in the Hume precinct. Addressing this matter is required by legislation and assessed during the Development Application process.	Unlikely	Minor	Very Low
9	Service Relocations – interruption to existing utilities	No easements are located within the site and none expected to be created as part of this proposal	Unlikely	Minor	Very Low
10	Damage to utilities	The urban development area site is located away from existing major utilities.	Unlikely	Minor	Very Low
	Material Use and Waste				
11	Material Use – excessive consumption of raw materials	The quantities of raw materials (and the embodied energy of those materials) to be utilised by the project would be comparable to other urban development projects. The anticipated construction works would be in line to what would be needed to establish an industrial use on the land that is similar to other industrial uses in the Hume precinct. Addressing this matter is required by legislation and assessed during the Development Application process.	Unlikely	Minimal	Negligible
12	Waste Management – inappropriate generation, reuse and disposal of waste streams	Any development project will generate waste streams. Waste management systems are in place for all developments in the Territory and are to be managed in accordance with the relevant guidelines. This proposal is of a size/scale that is not expected to generate significant or otherwise inappropriate waste streams. The anticipated waste generation and waste management requirements would be in line to what would be needed to establish an industrial use on the land that is similar to other industrial uses in the Hume precinct. Addressing this matter is required by legislation and assessed during the Development Application process.	Possible	Minor	Low

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
13	Toxic and Hazardous Materials – inappropriate handling leading to pollution event.	Hydrocarbons and other potentially hazardous materials will be used onsite during construction and operation of the facility. Management of fuels and other hazardous materials for operational requirements are required by law and undertaken in line with industry best practice methodologies, Australian Standards, EPA requirements and operational plans as may be required. This matter is commonly assessed during the Development Application process.	Possible	Moderate	Medium
14	Dispersal of litter and other gross pollutants	The development of the area and subsequent operation could result in the dispersal of litter and other gross pollutants into the receiving environment. The site and operations generally require a well-designed, set-out and managed proposal that includes careful litter and waste management practices (aerial vehicles are carefully managed and maintained and the areas in which they operate are kept clear of litter and gross pollutants).	Possible	Minor	Low
	Landscape and Visual Impacts				
15	Landscape Character – negative impacts on the visual amenity from vantage points.	The development will be visible from surrounding areas, including from some limited sections of major roads such as Monaro Highway and the western end of Lanyon Drive, as well as from the northern end of Sheppard Street but will present industrial in scale and nature. The site is however well removed and not visible from any established residential areas or any recreational open space areas where visual amenity values are more important.	Likely	Minimal	Low
16	Land Values – changes to the value of land in the locality	The presence of the development could impact upon land values in the area either positively or negatively. As the site is currently vacant undeveloped land, potential decreases in land value of Block 45 are not considered likely. The use is industrial in nature and will be managed in line with general civil aviation standards, practices and statutory requirements (including safety and flight operational rules). There is no evidence that the establishment of this facility will have any impact on land values in the vicinity of the site or elsewhere.	Possible	Minor	Low

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
	Soils and Geology				
17	Land Disturbance – unacceptable loss of vegetation and topsoil resources	The proposal will require the clearing of vegetation for development. This clearing may result in the loss of top soil and could potentially impact native regeneration from the natural soil seedbank. This matter is commonly considered and addressed by hand of a CEMP and/or CMP that is often condition as part of a Development Assessment and approval.	Possible	Minor	Low
18	Erosion	The site contains only gentle slopes where development will occur, limiting the potential for substantial erosion to occur.	Possible	Minor	Low
19	Soil compaction during construction	Soil compaction of areas not to be developed, and/or to be landscaped post-development may affect existing vegetation or limit potential for revegetation success.	Possible	Minor	Low
	Water Quality and Hydrology				
20	Groundwater – interception and altered drainage regimes	The project will not utilise or otherwise interfere with groundwater resources.	Unlikely	Moderate	Low
21	Surface Water Flows – alteration of natural drainage regimes	There are natural drainage lines that would be affected by the site development.	Unlikely	Moderate	Low
22	Surface Water Quality – water quality impacts downstream	The installation of impervious surfaces may increase runoff in some storm events. The site does not drain directly to any natural waterway, with surface drainage intercepted by the existing road drainage systems, limiting the potential for run-ff to impact on downstream waterways. Stormwater management on leases land are specifically considered in relation to run-off quantity and water quality in the Territory Plan and proponents are required to address these matters as part of a Development Application by the statute.	Unlikely	Moderate	Low
	Climate Change & Air Quality				
23	Planning for extreme weather events (storms)	The buildings, infrastructure and vegetation may be susceptible to damage by extreme wind, rain or hail events. The frequency of these events may increase as a result of predicted climate change but is not considered a significant outcome of progressing this proposal.	Possible	Minor	Low

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
24	Managing protracted drought	People (users), buildings and infrastructure, and surrounding flora and fauna are susceptible to the impacts of protracted drought and associated water scarcity.	Possible	Minor	Low
25	Greenhouse Gas Emissions – project contribution to greenhouse gas emissions.	The construction and operation of the proposal will contribute to greenhouse gas emissions through the use of materials and resources (energy) for the construction of the facility. The ongoing operation of the facility will also require the consumption of energy (electricity and gas) for powering buildings and will use fossil fuels for running the helicopters.	Likely	Minimal	Low
26	Bushfire	The development is within a bushfire prone area and may be susceptible to damage in the event of a bushfire. This matter is required by legislation and can be readily addressed as part of the DA assessment (as typically approached). The use propose is for an operation that is geared for bushfire management. Assets and trained operators will be on-site as part of the day-to-day operations and will be skilled in bushfire management at the site if required.	Possible	Minimal	Low
27	Air Quality – emissions of dust or odour during construction or operation.	Works within the construction footprint will potentially generate dust and odours. During operation some dust may be generated by helicopter take-offs and landing. Noting that the landing pads are hardstand surrounded generally by grasses areas the likely impact form this activity will be mitigated by design and implementation.	Likely	Minor	Medium
28	Release of sequestered carbon	Removal of vegetation and disturbance of top soil will result in the release of sequestered carbon.	Likely	Minimal	Low
	Noise Vibration and Lighting				
29	Noise and vibration – Impacts of construction activity on urban amenity and sensitive receivers.	No blasting or work in bedrock is anticipated. The site is relatively flat in the area where the development will take place and therefore noise and vibration resulting from construction earthworks would be minimal. There are no nearby sensitive receivers likely to be affected by constriction works given the location of the site within an industrial precinct and well away from any residential areas.	Likely	Minor	Medium

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
30	Impacts of construction activity on local biodiversity.	No blasting or work in bedrock is anticipated. The site is relatively flat in the area where the development will take place and therefore noise and vibration resulting from construction earthworks would be minimal. The local biodiversity of the site was found to support relatively common species that are already well-adapted to urban and peri-urban environments, and therefore unlikely to be significantly affected by the noise and vibration levels anticipated.	Likely	Minor	Medium
31	Noise from operation of helicopters on urban amenity, sensitive receivers.	The anticipated operational noise levels and footprints of the operational helicopter models to be used (Bell 206 B Long Ranger) are including compliance certificates with the EASA (European Equivalent of CASA) guidelines that include static and "fly-over" noise specifications. The certificates demonstrate that generally noise levels (as measured by EASA methods) are generally around the 90dBA, and under 92dBA. For perspective, the allowable noise level for a registrable car is 96dBA, and for a motorbike up to 100dBA. The noise limits at compliance point for uses in industrially zoned land (Zone A as per the Environmental Protection Regulations) are 65dB(A) Monday-Saturday 7am to 10pm and Sundays between 8am and 10pm. Noise management is commonly undertaken by hand of endorsed Noise Management Plans that is assessed and approved as part of the Development Application processes. Most flights (take-off and landing) will be to the northeast, over Sheppard Street and Lanyon Drive, and then over undeveloped rural broadacre areas and will be well separated from neighbouring industrial uses. Practically no flights will operate over existing leased land of Hume. Noise emissions from the helicopters into adjacent nearby industrial uses will be infrequent and generally well below the noise emissions generated by cars or motorbikes.	Almost certain (without a NMP)	Minor	High

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
32	Noise from operation of helicopters on biodiversity	As stated above, the noise levels are below the allowable noise level for a registrable car is 96dBA, and for a motorbike up to 100dBA, and likely less than the accumulative traffic noise from the adjacent roads, which have regular start/stop traffic flows and carry high numbers of heavy vehicles. Although there will be some impact to local biodiversity from noise, the potentially affected species include mainly common birds, which either already have some adaption to nearby similar uses (Southcare helicopters and Canberra Airport), and can likely adapt to the noise from this operation. Importantly, no significant (i.e. listed threatened) species are known or considered likely to be affected by noise from the helicopter operations.	Likely	Minor	Medium
33	Lighting – Impacts on urban amenity and nocturnal fauna during construction and operation	The development area will require minimal and infrequent lighting during construction. During operation, normal business hours for the office uses will apply with some safety lighting of the car-park for afterhours use. This lighting will be designed in accordance with applicable Australian Standards for lighting. Lighting required for helicopter flights are minimal and will be used very infrequently. As stated, night-time flying will only be for emergencies and the assets used are equipped to operate in low light environments with pilots trained to operate in these conditions. For firefighting services in remote or distant sites, often the team will stay overnight and return the following day limiting the amount of night-time flying required.	Likely	Minor	Medium
	Biodiversity and Nature Conservation				

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
34	Native vegetation - Impacts on native vegetation from clearing activities during construction	The proposed development of the site will impact native vegetation through the removal of some of the existing native trees in the north-eastern portion of the site. The overall nature conservation values of this vegetation are considered to be minimal as previously described, and consequently, the impacts to biodiversity consideration are considered to be acceptable.	Almost Certain	Minor	High
35	Threatened Species and Communities - Yellow Box - red Gum Grassy Woodland Endangered Ecological Community (EEC).	No listed threatened species or ecological communities are known or considered likely to occur at the site or rely on the site as important habitat. As stated, the vegetation at the site does not meet the criteria for classification as being part of the (critically) endangered Box Gum Woodland ecological community. Additionally, targeted surveys for the Striped Legless Lizard have been undertaken in accordance with prescribed guidelines and failed to locate the species. No other listed threatened species are likely to occur at the site	Unlikely	Moderate	Low
36	Native fauna - habitat disturbance and fragmentation	Although some (mainly common) native species are known occur at the site, and will suffer some disturbance from the construction and operation of the facility, the site is not considered important in terms of maintaining the viability of any local populations of native species. The site is not considered important in maintaining local fauna connectivity, given its location at the outer margins of an industrial precinct, and surrounded by busy (main) roads and existing industrial uses on all sides. Extensive areas of undeveloped rural lands and reserved land occurs further to the north and west of the site (on the other side of the roads) which would provide more important regional and local connectivity. The works would not fragment these areas. The operation of helicopters may result in some minor and most likely temporary noise disturbance. In extreme circumstances, this can lead to habitat alienation/avoidance by some species, and therefore can be a form of habitat sterilisation. Existing aircraft operations already occur close by which may have enabled some habituation of local fauna to these uses already. Risks of collisions with fauna are possible, although as noted above, given existing similar uses nearby and the ability of avifauna (the group of animals at greatest risk), some adaptation to these uses could be expected, noting the length of time is likely to vary between different species).	Possible	Minor	Low

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
37	Invasive Species – introducing or encouraging the presence of invasive flora or fauna.	Construction activities and future human habitation could potentially introduce invasive pest species. Some areas of the site are already dominated by weeds. Additional disturbance could encourage their spread over the site. No ecological communities or habitat for threatened species is known to occur within the site that may be affected by the spread of weeds within the site.	Possible	Minor	Low
38	Aquatic Biology – causing change in the aquatic biology downstream.	No waterways occur in the site. Jerrabomberra Creek is located about 250 m to the east, and separated from the site by roads with stormwater management systems. Hydrocarbon spills within the site could have the potential to enter the stormwater system which may affect downstream waterways.	Unlikely	Moderate	Low
	Aboriginal and Cultural Heritage				
39	Places and Objects – unplanned impacts on cultural heritage places or objects.	There are no known Aboriginal sites within the proposed development area. The site's location and (likely) history of disturbance make it unlikely additional Aboriginal sites of high conservation value will be found.	Unlikely	Moderate	Low
40	Values – impacts on cultural values	There are no known cultural values within the proposed development area.	Unlikely	Moderate	low
	Social				
41	Failure to incorporate requirements of other stakeholders	Public consultation processes will be undertaken to appreciate, acknowledge, address or otherwise respond to stakeholder requirements. Stakeholders, in particular the ESA have specific requirements that are required to be met.	Unlikely	Moderate	Low
42	Level of Interest – interest from community not catered for	Major or otherwise significant projects such as this (as declared by the Minister) typically provide a portal for information to the community. A lack of information provided by the proponent can result in misinformation being propagated by vested interests.	Unlikely	Moderate	Low

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
43	Recreational Opportunities – loss of recreational amenity or area	The land and immediate surrounds are not used for recreational purposes.	Unlikely	Minimal	Negligible
44	Human Error - damage to the environment through ignorance, carelessness or failure to follow instruction.	Construction Workers or Plant Operators may undertake works outside their instructed scope without understanding the consequences. The air assets are registered aerial vehicles that are maintained to the requirements of CASA and are being operated within their design specification. The aerial operations will be in accordance with CASA requirements and other Civil aviation standards. Standard requirements include minimising operations over build-up areas, structures, people and places where people or property can be damaged by operational incidents (including emergencies).	Possible	Minor	Low
45	Malicious Act	The proposal could be the target of sabotage or vandalism. The facility will operate as a high security space with workers and operators trained and certified to operate within a high clearance security environment. The facility will be designed to meet CASA standards around protection of aerial assets and their operational areas.	Unlikely	Moderate	Low
46	Failure to meet community needs and expectations	The community will have expectations in relation to emergency services delivery and response, and particularly, bushfire management services and tactical security, as well as demand from other business sectors to support commercial outcomes.	Unlikely	Moderate	Low
	Health				
47	Contaminated Land - the project occurs on contaminated land, exposing workers or the environment to potential toxins.	The land is not known to be contaminated.	Unlikely	Moderate	Low
48	Public Safety - accidental harm to the public	The project may present a risk to public safety through accidents, including possible aircraft crashes. All flights will be undertaken in accordance with CASA standards and guidelines in a strictly managed environment. Thereby minimising risks to public safety.	Unlikely	Major	Medium
	Economic Impacts				

	Identified Risks	Commentary	Likelihood	Consequence	Unmitigated Risk
49	Cost Benefit Analysis – Project returns a negative value.	The project is a self-funded private enterprise, and will not utilise public (government) funds. The development will occur on previously undeveloped land. The land value would not be diminished through development and is expected to present a unique opportunity and service to the ACT economy.	Unlikely	Moderate	Low
	Compliance				
50	Failure to adhere to guiding documentation	Failure to comply with project documentation, may lead to unforeseen impacts.	Possible	Moderate	Low

8 Measures to avoid impacts

DESCRIPTION OF MEASURES WITHIN THE PROPOSAL THAT SEEK TO AVOID AND MINIMISE (AND AS A LAST RESORT OFFSET) IMPACT ON IDENTIFIED CONSERVATION VALUE

Table 9 below presents the identified risks from Table 8 that have been assessed to have an unmitigated risk level of Medium or higher. For each risk a number of mitigation measures are discussed, resulting in a Mitigated Risk level.

The mitigation measures identified in this table will be adopted by the proponent in the design, construction and operation of the development. Additional controls may apply to future owners of the land or land managers.

The majority of risks considered in the PRA were determined to be mitigated through the implementation of environmental management controls both during construction and occupation and operation of the area.

Table 9 - Mitigated Risk Assessment

	Identified Risks	Unmitigated Risk	Mitigation Measures	Likelihood	Consequence	Mitigated Risk
	Traffic and Transport					
1	Transport – damage to road infrastructure by construction or delivery vehicles	Low	The local road network already frequently accepts large heavy vehicles given the existing industrial uses of the Hume precinct. As such, impacts to roads are considered likely to be minor in nature. All vehicles attending the site will be road registered and of a type/class that is permitted to use the road network surrounding the site.	Possible	minor	low
2	Traffic – increased traffic, delays and road safety issues.	low	Detailed design will be informed by a traffic assessment of both construction and operation phases. A traffic management plan will be developed and endorsed prior to construction	Possible	Minor	Low
3	Traffic safety - Distraction to motorists from helicopter take-offs and landings	Medium	Further assessment of traffic safety measures will be undertaken with recommendations to be developed and incorporated as/where appropriate to ensure safety to motorists. The presence of the nearby helicopter landing facility has shown that the operation of aircraft in this manner does not pose a significant risk to traffic operations.	Remote	Major	Low

			Awareness, education and promotion of the presence of aircraft in the locality may further lower the risk of impact by arming drivers with the knowledge of operations and removing the surprise factor of the activity happening unexpected.			
4	Energy (electricity & gas) – excessive demand for energy during construction and operation	Very low	No action proposed	Unlikely	Minor	Very Low
	Utilities					
6	Stormwater – pollution of stormwater	Medium	This is a matter that is statutorily considered and managed as part of the DA and construction processes. The works will be undertaken under the controls of a sediment and erosion control plan in accordance with industry best practice. A sediment and erosion control plan will be endorsed by the EPA prior to construction commencing. Ongoing management requirements for sediment and erosion control will be documented in Construction and Operational Environmental Management Plans that will be endorsed by the EPA.	Unlikely	Moderate	Low
	Materials use and waste					
13	Toxic and Hazardous Materials – inappropriate handling leading to pollution event.	Medium	This is a matter that is statutorily considered and managed under the Environment Protection Act as administered by the EPA. The works will be undertaken under the controls of a construction and environmental management plan which will details measures to prevent spills or mishandling, and emergency response procedures in the event of an incident. Ongoing management requirements for the control of toxic or hazardous substances will be documented in Construction and Operational Environmental Management Plans that is commonly required as a condition of approval in DA and for endorsement by the EPA.	Unlikely	Moderate	Low
	Soils and Geology					

17	Land Disturbance – unacceptable loss of vegetation and topsoil resources	Low	The quantum of vegetation clearing will be minimised to that necessary for the implementation and operation of the proposed facility/development. Machinery will be prevented from entering areas to be retained/protected from development. Earthworks on site will be designed to minimise the need to import or export soil. Where topsoil is removed it will be stockpiled in low piles and reused/ redistributed on site. Where necessary some areas will be revegetated immediately following construction to stabilise soils.	Remote	Minor	Negligible
	Climate Change and Air Quality					
26	Bushfire	low	The establishment of asset protection zones and design and construction of buildings in accordance with an appropriate bushfire and basic ember protection requirements as per the Australian Standard (AS3959), along with onsite firefighting infrastructure will reduce the risk and consequence of future bushfires.	Possible	Minimal	low
27	Air Quality – emissions of dust or odour during construction or operation.	Medium	During construction, dust will be controlled using water and other suppression techniques where necessary.	Possible	Minor	Low
	Noise Vibration and Lighting					
29	Noise and vibration – Impacts of construction activity on urban amenity and sensitive receivers.	Medium	Works will be undertaken in accordance with a construction environmental management plan which will sets limits on the timing duration of construction activities to reduce noise levels	Possible	Minor	Low
30	Impacts of construction activity on local biodiversity.	Medium	Works will be undertaken in accordance with a construction environmental management plan which will provide management recommendations to reduce the potential impact to native fauna, including defining construction footprint limits, tree protection fencing, and potentially pre-clearance surveys.	Unlikely	Minor	Very Low

31	Noise from operation of helicopter on urban amenity, sensitive receivers.	High	The site design and set-out will be prepared in accordance with the EPA standard requirements for noise management at compliance points in industrial areas to minimise impact from all on-site operations. An operations management plan will be prepared and implemented to direct flight operations/traffic and minimise further impacts on the site and surrounds. This plan may include matters of control including operational timing, operations zones, approach paths to and from the site in various weather conditions (wind directions) and the like. An Operations Management Plan will be implemented to limit ensure that noise impacts are effectively limited and managed during the operations at the site.	Possible	Minor	Low
32	Noise from operation of helicopter on biodiversity	Medium	As above and can be managed by the operations management plan. The plan may include requirements such as operational restrictions that limit the timing and frequency of standard flight operations at certain times (e.g. certain times of the morning/evening) if it is found to potentially excessively disturb fauna.	Possible	Minor	Low
33	Lighting – Impacts on urban amenity and nocturnal fauna during construction and operation		Lighting for construction at night can be limited by controls in the construction environment management plan. Additional controls such as the type and direction of lighting can be implemented both during construction and for the operation. These would be in accordance with relevant Australian Standards on the control of light spill. Lighting impacts from operating aircraft at night would be negligible due to the infrequency of such flights and the assets used on-site. The helicopter used and their pilots are equipped and trained to safely operate in low light environments.	Unlikely	Minor	Very Low
	Biodiversity and Nature Conservation					
34	Native vegetation - Impacts on native vegetation from clearing activities during construction	High	The removal of vegetation will be minimised and will be consistent with the requirements of the approved development plan (once obtained). Vegetation clearing activities would be conducted in accordance with a construction environment management plan to further minimise direct and indirect or offsite impacts.	Possible	Minor	Low
	Health					

48	Public Safety - accidental harm to the public	Medium	Appropriate training, licensing, monitoring and auditing of all personnel. These are standard requirements that is statutorily set and enforced in the aviation realm. THE operation of aerial equipment such as helicopters is a highly regulated and manages environment. The day to day operation of this machinery are based on a mandatory requirement that is seated in high levels of safety and security as a standard provision.	Remote	Major	Low
	Compliance					
50	Failure to adherence to guiding documentation	High	Regular toolbox talks, briefings and education sessions will be conducted with construction personnel to ensure compliance with documented practices. Operations are licensed through CASA with strict auditing/monitoring procedures	Unlikely	Moderate	Low

9 Risk assessment summary

While some of the unmitigated risks are identified as high and potentially significant, the mitigation measures that are identified demonstrate that all of the key risks can be managed to an acceptable level in either design, operation, management of a combination of these outcomes. It should be noted that their operation of aerial vehicles like helicopters are statutorily controlled and afforded a high level of risk mitigating in the licensing, operation and maintenance requirements – this is standard practice and will be a requirement of operating these machines in this location.

The mitigation measures identified are commonly required and readily able to be prepared for assessment as part of a standard Development Application process. Alternatively these matters can be incorporated into the design for the development through the EIS process and confirmed pre-DA.

The management of the bushfire risks will continue to be an ongoing component of the project, however, given the proponent's relationship, including services and training, with firefighting bodies, it is expected that this development will have industry-leading fire-fighting capabilities and skills present at the site.

The management of noise will be further resolved through the public consultation process to ensure that all stakeholders or other potentially affected entities are provided with the appropriate information and have sufficient opportunity to comment on the project so that any concerns can be addressed accordingly.

10 Decisions under the EPBC Act

The proposed development is considered unlikely to affect any Matters of National Environmental Significance (the NES) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) – refer to Attachment 1 for further consideration of this matter.

Based on the conclusions of the biodiversity assessment, it is believed that a referral under the provisions of the EPBC Act is not required for the proposal.

11 Attachments

Attachment 1 – Biodiversity Assessment (PATH-Co Pty Ltd, 21 November 2020)

(refer to separate document)