ACT Government | Territory Planning Authority

Environmental Impact Statement

Assessment Report

FOR

EMERGENCY SERVICES, MAINTENANCE AND TRAINING FACILITY

May 2026

City and Environment Directorate

Pursuant to Section 222 of the *Planning and Development Act 2007* (PD Act), and as per the transitional arrangements under section 636 of the *Planning Act 2023,* this Assessment Report (this Report) evaluates the revised environmental impact statement (EIS) for the following application:

Ref no: EIS202000027
Document no: 1-2020/101439
Project: Emergency Services, Maintenance and Training Facility
Date scoping document issued: 24 March 2021
Date draft EIS lodged: 19 July 2022
Date revised EIS lodged: 25 July 2023
Date response to first s224 notice lodged: 27 July 2024
Date response to second s224 notice lodged: 6 June 2025
Proponent: Forestrack Pty Ltd
Applicant: Canberra Town Planning
Location: Block 45 Section 3 Hume
Street address: Sheppard Street, Hume (corner of Monaro highway and Lanyon Drive)

As required by section 225A of PD Act, the territory planning authority (the Authority) has prepared this Report for the Minister for Planning and Sustainable Development. The Report confirms that the Authority is satisfied that each matter raised in the scoping document for this proposal is addressed.

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Glossary and definitions

Term	Definition
ACT	Australian Capital Territory
ACTF&R	ACT Fire and Rescue
ATC	Air Traffic Control
The Authority	The territory planning authority
The Council	The ACT Heritage Council
CASA	Civil Aviation Safety Authority
CED	City and Environment Directorate
CEMP	Construction Environmental Management Plan
CHA	Cultural Heritage Assessment
CFF	Conservator of Flora and Fauna
DA	development application
EIA	Environmental impact assessment: the process of identifying, predicting, evaluating and mitigating the biophysical, social, and other relevant effects of development proposals before major decisions and commitments are made.
EIS	Environmental impact statement: a document prepared to detail the expected environmental, social and economic effects of a development, and state commitments to avoid, mitigate or satisfactorily control and manage any potential adverse impacts of the development on the environment. In the ACT, an EIS is required for proposals in the impact track as per Section 127 of the *Planning and Development Act 2007*.
EISAR	EIS Assessment Report (this document)
EMP	environmental management plan
EPA	Environment Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
EPSDD	Environment, Planning and Sustainable Development Directorate
ESA	Emergency Services Agency
ESO	Environmental Significance Opinions
MNES	Matter of National Environmental Significance (as per the EPBC Act)
NASF	National Airports Safeguarding Framework
NCA	National Capital Authority
NSW	New South Wales
OEMP	Operational Environmental Management Plan
PD Act	*Planning and Development Act 2007* (ACT)
PD Regulation	*Planning and Development Regulation 2008* (ACT)
The Project	The Emergency Services, Maintenance and Training Facility
QPRC	Queanbeyan Palerang Regional Council
RAOs	Representative Aboriginal Organisations
SHE	Statement of Heritage Effects
TCCS	Transport Canberra and City Services
UFP	Unexpected Finds Protocol

1. Introduction

This Report is to the ACT Minister for Planning and Sustainable Development (the Minister) on the assessment of the Environmental Impact Statement (EIS) in relation to the Emergency Services, Maintenance and Training Facility (the Project).

The Project does not trigger the requirement for an EIS under Schedule 4 of the *Planning and Development Act 2007* (PD Act). On 20 September 2018 the Minister declared that the Project would require an EIS under section 124 of the PD Act, and approval of an impact track development application (DA) prior to direct sale of the site. The declaration was made due to the proposed helicopter take-off and landing facility at the site, and potential hazards and risks relating to the operation, noise, and impact on surrounding land uses. The impact track assessment process would also provide opportunity for further public consultation. The DA for this Project was submitted as a concurrent application under DA202240365.

1.1. Project description

Canberra Town Planning has acted as the applicant for this Project on behalf of Forestrack Pty Ltd (Forestrack), the proponent for this Project.

The Project is the establishment of a new headquarters and operations base for Forestrack Bushfire Response and Training. The purpose of the proposed facility is to provide emergency services for bushfire response activities, training, forestry and related services, including a helicopter landing/departure area. Ancillary uses supporting these functions include repairs and maintenance of plant and equipment.

The Project includes:

- 4,700m2 (approximately) for workshop and truck wash bay, aircraft hangar, and administration building;
- A helicopter landing pad that will service the airborne activities of the business;
- 3,600m2 hardstand, for vehicle parking and manoeuvring;
- 49m2 (approximately) waste enclosure; and
- 7,600m2 identified for future possible development.

1.2. Project background

Secure Aviation (Holdings) Pty Ltd (Secure Aviation), a sister company of Forestrack, was listed as the proponent at the scoping stage for the Project. Both Forestrack and Secure Aviation are affiliates of TRG Bushfire Response and Training and provide both airborne and ground-based services to a range of emergency and strategic response operations.

Secure Aviation and Forestrack originally sought approval for Direct Sale of Block 17 Section 18 Hume for the development of an aviation and forestry base (DA 2016-224), however that application was refused due to unacceptable safety risk in relation to the management of the adjacent Alexander Maconochie Centre.

Block 45 Section 3 Hume (the Project site) was subsequently identified as a potentially suitable location. As part of the assessment of the Direct Sale application, the Minister considered the potential impacts of the proposed development of the site. The Minister decided that impacts relating to matters such as noise, associated hazards relating to the operation of aircraft, as well as potential impacts to surrounding land uses would need to be thoroughly investigated prior to any approval being granted. On 20 September 2018, under section 124 of the PD Act,

the Minister declared that the Impact Track applied to the development proposal, therefore an EIS would be required.

In 2019, Secure Aviation lodged an EIS application for a helicopter operations base, with 3 helipads, to provide support for emergency services, forestry and related services, educational institution and tourism uses with ancillary uses supporting these functions (EIS20190007). A scoping document was issued but no draft EIS was submitted within the required 18-month timeframe.

Forestrack operates existing infrastructure and support businesses, one near the proposal site in Hume (76-78 Sheppard Street; Block 11 Section 2) and another near Murrumbateman in regional New South Wales (NSW). The existing Hume site accommodates engineering works, machinery servicing and supply storage for Forestrack operations in the ACT and adjoining NSW region. The proposed facility will replace activities in Murrumbateman as well as those located at 76-78 Sheppard Street. The proposal seeks to combine the facilities at the current sites into one base to enhance the efficiency of operations.

1.3. Project location

The EIS relates to land in the district of Jerrabomberra, ACT. The Project site is Block 45 Section 3 Hume, (approximately 3.5 hectares) and is located at the southwestern corner of Sheppard Street and Lanyon Drive. The land is zoned NUZ1 Broadacre. The project location is shown in Figure 1 and 2.

Figure 1 – Project Location – Block 45 Section 3 Hume, ACT

Figure 2 – Site Plan of the project (source: EIS Report, Canberra Town Planning – Final Revised EIS 2025).

1.3.1. Legal land description and tenancy

The Project will directly affect one block; Table 1 shows the legal land description for that block and the neighbouring land, including details of tenancy type and tenant.

Table 1 - Legal land description and tenancy

Block	Section	Division	Tenancy	Tenant/Custodian
Directly affected lands				
45	3	Hume	Unleased Territory Land	TCCS - City Presentation
Neighbouring lands				
5	3	Hume	Leased Territory Land	Private lessee
2	3	Hume	Leased Territory Land	Private lessee
-	-	-	Unleased Territory Land – Road Reserve (Sheppard Street, Lanyon Drive)	TCCS – Roads ACT
-	-	-	Designated Area – Main Avenues and Approach Routes (Monaro Highway)	National Capital Authority

1.4. Alternatives to the project

The EIS has considered a number of sites in the ACT region as viable options for this Project, in terms of issues such as location, land size and environmental impacts. Alternative sites investigated included parts of Blocks 15 and 13 Section 18 Hume, and land to the west of the Molonglo and Murrumbidgee rivers.

The proposal as described in the EIS was considered the best option by the proponent as the site meets the below requirements:

- Land with the correct zoning and locality to support the operation.
- Direct road access located close to a main/arterial road to facilitate good access for support and ground operations (i.e. emergency response vehicles, transportation of heavy equipment for use in fire management and deliveries of equipment).
- Areas to support operational training.
- Adequate land area to establish a 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.

There is currently no facility of this nature (bushfire and forestry training, with the use of heavy machinery specifically adapted to forestry operations, to mitigate the spread of bushfire) supporting emergency facilities and reaction operations in the ACT. The proponent currently operates from two sites as described in section 1.2 of this Report. The EIS states that for this reason, the 'do nothing' option would result in operations continuing with a sub-optimal emergency response, due to the two very separate bases.

2. The environmental impact assessment process

Environmental Impact Assessment (EIA) processes are used to identify, predict, plan for and manage the impacts of development proposals before a decision is made about the project going ahead. An EIA process is required to be undertaken for projects in the impact track. Three options are available for EIA Process – EIS, EIS exemption and Environmental Significance Opinions (ESO), with the suitability of each option dependent on the type and scale of project.

An EIA process is not an approval process. It ensures potential impacts and possible mitigation measures have been fully investigated and documented in accordance with the requirements of a scoping document. The EIS is used as a key assessment tool for any DA lodged for the proposal. The EIS also recommends conditions to be imposed on a DA (if approved) for the proposal. Figure 2 outlines the EIS process.

Under section 127 of the PD Act, a DA for a development proposal in the impact track must include a completed EIS in relation to the proposal (unless the application is exempted under section 211 of the Act).

Section 123 of the PD Act states that the impact track applies to a development if:

- the relevant development table states that the impact track applies;
- the proposal is of a kind mentioned in Schedule 4 of the PD Act;
- the Minister makes a declaration under section 124;
- section 125 or section 132 applies to the proposal; or
- the Commonwealth Minister responsible for the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) advises the Minister in writing that the development is a controlled action under the EPBC Act, section 76.

2.1. Impact track triggers

As described in the introduction of this Report, the proposal is in the impact track due to a declaration by the Minister under section 124 of the PD Act. The declaration was made due to the proposed helicopter take-off and landing facility at the site, and potential hazards and risks relating to the operation, noise, and impact on surrounding land uses. The impact track assessment process would also provide opportunity for public consultation.

In relation to the impact track triggers under Schedule 4 of the PD Act, Part 4.2, item 4 "*proposal for construction of an airport or airfield (other than a helicopter landing facility used exclusively for emergency services purposes, including medical evacuation, firefighting, retrieval or rescue)"* was considered for relevance and dismissed. The proposal is not described as an airport or airfield, and it will not be registered as an airport for civil aviation operations. The type of use is described as relating to bushfire response and training centre operations (maintenance/servicing) actions are considered exempt from the above Schedule 4 trigger. However, the project is described as providing support to training, forestry and related services.

2.2. EIS process

The flowchart below outlines the EIS application process.

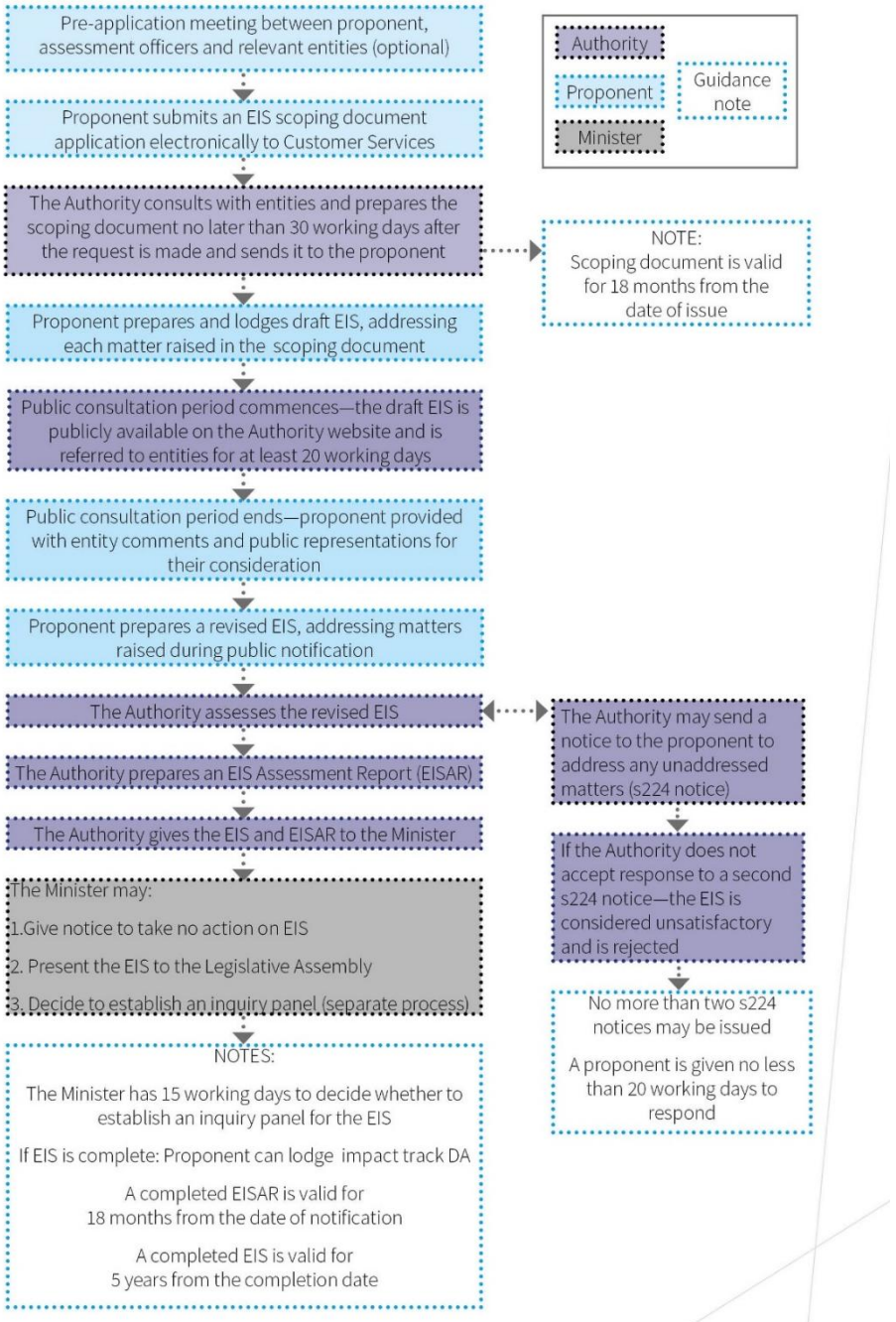

Figure 3 - The EIS process.

2.3. Scoping Document

To guide the content of an EIS and therefore the investigations and research required, a scoping document is prepared. The Authority within EPSDD (now known as the City and Environment Directorate or CED) prepares a scoping document in response to an application made for the proposal.

On 9 February 2021, Canberra Town Planning submitted a request for a scoping document for an EIS pursuant to section 212(1) of the PD Act.

The Authority must consult with entities prescribed in section 51 of the *Planning and Development Regulation 2008* (PD Regulation) about the scoping document application. The Authority referred the scoping document application to the entities identified in Table 2 and invited for written comments. The entities were given 15 working days to provide comment**.**

Table 2 Entity comments on scoping document application

Entity consulted	Entity response
Evoenergy	No comments provided.
Icon Water	10 March 2021 Icon Water commented that the facility's potential use of firefighting foam raises concerns due to the historical contamination from polyfluoroalkyl substances (PFAS), which are toxic and persistent in the environment. Additionally, the use of hydrocarbons and other hazardous materials during construction and operation poses contamination risks to Icon Water assets and human health. These chemicals should be detailed in future development approvals for Icon Water's review. Developers should submit an "In principle" approval application to confirm network capacity and address water main relocation at their expense. The block currently lacks water and sewer services, but connections are available along Sheppard Street. For liquid trade waste, developers need Icon Water's approval before sewer connection, and a trade waste application is required to determine necessary pre-treatment or off-site disposal. Any work impacting Icon Water infrastructure requires prior acceptance
Jemena	No comments provided
Conservator of Flora and Fauna (CFF)	17 March 2021 The CFF had the following requirements: • The EIS should clarify the location of native dominated patch/patches in rocky areas and consider committing to establish temporary fencing around these patches outside of the development envelope for the duration of construction • Bushfire planning must take into consideration adequate protection for fuel storages or other stockpiled materials which may produce toxic fumes if ignited by a bushfire, in addition to adequate access and infrastructure to minimise this risk.
Emergency Services Agency (ESA)	26 February 2021 ACT Fire and Rescue noted that the report will address the bushfire risk at the development application stage, including the establishment of asset protection zones and construction to AS3959.
Environment Protection Authority (EPA)	23 March 2021 The EPA stated that the EIS should include an environmental assessment in accordance with EPA endorsed guidelines to assess its suitability for its proposed use from a contamination perspective. The findings of the assessment must be reviewed and endorsed by the EPA prior to the site being used for the proposed use.
ACT Heritage Council (the Council)	9 March 2021 The Council considers portions of Block 45, and specifically 'Area 2' woodland areas, have potential to contain unrecorded Aboriginal places. The Council requested a heritage inspection of 'Area 2' woodland areas by a qualified archaeologist and Representative Aboriginal Organisations (RAOs), with a report submitted to the

Entity consulted	Entity response
	Council for endorsement. If any Aboriginal places or objects are discovered within the proposed development area, efforts should be made to conserve them *in situ*. If *in situ* conservation is not feasible, a Statement of Heritage Effect (SHE) approved under Section 61H of the *Heritage Act 2004* will be required before any work can begin.
ACT Health	2 March 2021 The Health Protection Service advised: • In order to prevent land contamination from hydrocarbons and other hazardous materials during construction and operation, appropriate management measures must be included in Construction and Operation Environmental Management Plans (CEMP and OEMP). • The facility must ensure proper storage of firefighting foams containing PFAS (if required onsite) to prevent contamination of land. In additional, areas where these foams might be used during emergencies on site should be managed to reduce land contamination. • An Unexpected Finds Protocol (UFP) is to be developed and implemented before works commence. • All reasonable and practicable measures must be taken to suppress dust and minimize air quality impacts during both construction and operation.
Transport Canberra and City Services (TCCS) which is now part of the CED	15 March 2021 TCCS requested that the EIS address: • The extent of traffic generated by the development during peak hours and considering its 24/7 operations. • The impact on nearby roads like Monaro Highway, Sheppard Street, and Lanyon Drive, which are projected to be near capacity. • The types and volumes of heavy and light vehicles accessing the facility. • The transportation of hazardous materials to the site. • The potential environmental impact on the northern open space, particularly concerning high-quality trees.
National Capital Authority (NCA)	23 February 2021 The NCA had no comments for the scoping document. However, any future development application on this site will need to consider visual impact to the Monaro Highway and be consistent with Development Control Plan 171/94/853.
Queanbeyan-Palerang Regional Council (QPRC)	19 February 2021 QPRC stated that the land in NSW adjoining Hume is zoned for residential purposes. QPRC requests that the EIS recognise across border impacts and address the potential impact of noise, particularly noise associated with helicopter flights as well as make recommendations on how these might be ameliorated.
Canberra Airport	16 March 2021 Canberra Airport requested the following to be addressed in the EIS: • Concerns about a lack of consultation with Canberra Airport, the Civil Aviation Safety Authority (CASA), Air Services Australia and the ESA. • National Airport Safeguarding Framework (NASF) guidelines C and H. • Air Traffic Control in relation to Canberra Airport's flight paths. • Potential impacts on biodiversity based on detail of flight operations. 13 April 2021 (after scoping document had been issued) Canberra airport stated that they withdrew their previous representation, following a meeting with Secure Aviation where they received confirmation Canberra Airport would be kept informed on the development.
Strategic Planning	9 March 2021 Strategic Planning notes helicopter noise is an identified impact, but requests that the EIS considers other helicopter impacts, such as rotor wash, on adjacent development and businesses. The proposed major upgrade to the existing 3-way intersection of Lanyon Drive/Sheppard Street and to the Monaro Highway in the vicinity of the site must also be considered.

Entity consulted	Entity response
Civil Aviation Safety Authority (CASA)	No comments provided
Air Services Australia	No comments provided

On 24 March 2021, the scoping document was issued by the Authority to the proponent pursuant to section 212(2) of the PD Act (**Appendix 1**). The scoping document set out the matters to be addressed in the EIS and contained, at a minimum, the requirements required in section 50 of the PD Act and section 54 of the PD Regulation.

Pursuant to section 214 of the PD Act, the scoping document was issued within 30 working days after the application was made. The scoping document was notified on the ACT Legislation Register on 29 March 2021.

Under section 215 of the PD Act, the scoping document is effective for 18 months from the day after the date on the scoping document. After receiving the scoping document and pursuant to section 216(2) of the Act, the proponent is required to:

a) prepare a draft EIS that addresses each matter raised in the final scoping document for the proposal and

b) give the draft EIS to the Authority for public notification.

A cross-reference document was included as an Appendix to the EIS to cross reference the contents of the EIS to the contents required in the scoping document (**Appendix 2**).

2.4. Draft EIS

The purpose of the draft EIS is to identify and describe the potential environmental, social and economic impacts of the proposal, including cumulative, regional, temporal and spatial considerations.

On 14 June 2022, Canberra Town Planning gave the Authority a draft EIS, under section 216(2) of the PD Act. A concurrent DA (DA202240365) was lodged for the proposal on 25 August 2022.

2.4.1. Public notification of draft EIS

Pursuant to section 217 of the PD Act, the Authority publicly notified the draft EIS and concurrent DA from 26 September 2022 to 8 November 2022, being 35 working days. This is in accordance with the minimum requirement under section 218 of the PD Act, which states that the public consultation period of the draft EIS is no less than the concurrent consultation period (35 working days under section 147AA of the PD Act).

During the public consultation period, a copy of the draft EIS available on the Authority's website. This public consultation process provided interested stakeholders and the community with the opportunity to make representations on the proposal or in respect to specific environmental issues of concern.

No public representations were received during the consultation period, and the revised EIS has stated this. There were also no public representations received on the concurrent DA.

2.4.2. Entity referral of EIS

On 27 September 2022 the draft EIS was referred to each of the entities who were referred the scoping document. The referral took place at the draft EIS stage so that the proponent could

address entity comments in revising their EIS. Additional comments were sought on the revised EIS where the entity had requested further information from the proponent. Comments on the EIS were received from 13 entities, summarised in Table 3.

Table 3 - Summary of entity comments on the draft EIS

Referred entity	Entity response
ACT Health	11 October 2022 The Health Protection Service advises that the revised EIS should address the potential for the use and storage of firefighting foams containing PFAS. If applicable, the revised EIS is to consider areas where the foams may need to be used on site and propose measures to minimise land contamination risks.
Evoenergy	No comments provided.
Icon Water	8 November 2022 Icon Water advised: • The development can connect to Icon Water's sewer system but may need sewer augmentation, requiring detailed hydraulic assessment at the DA phase. • The existing water network can likely provide fire flow at FRT 4 fire risk category. Augmentation might be needed based on development type and fire risk, requiring detailed analysis at DA phase. The facility must consider Icon Water's acceptance criteria and pre-treatment guidelines for Liquid Trade Waste during design and apply for approval before connection to sewer. Consultation may be needed to discuss discharge and pre-treatment requirements or off-site waste disposal. Management of liquid wastewater during construction and handling of potentially contaminated water must be addressed, ensuring no discharge to sewer without approval.
Jemena	No comments provided.
Conservator of Flora and Fauna	3 November 2022 The Conservator provided the following comments: • The draft EIS adequately addresses all known impacts of the proposed works, noting 2019 surveys found no Striped Legless Lizards or other threatened fauna, and that removing four trees is unlikely to significantly impact biodiversity, as these trees mainly support common birds and lack nesting habitats. • If diesel storage is proposed, the EIS must address this, and management of associated risks.
Emergency Services Agency	8 November 2022 ACTF&R note Forestrack's indication of no stockpile or fuel storage on site. ACTF&R and ACT Rural Fire Service agree with the assessment and recommendations in the Bushfire Protection Assessment provided by Ecological; ACT Emergency Services Agency supports the proposal.
Environment Protection Authority	23 December 2022 The EPA has no further comments on the EIS and will provide comments on the DA.
ACT Heritage Council	14 October 2022 The Council advises that the EIS addresses the requirements of the scoping document and adequately describes the anticipated heritage impacts and how these will be avoided, minimised and mitigated. The Unexpected Discovery Plan in Appendix 2 of the Cultural Heritage Assessment must be followed during all works, with additional statutory approvals from the Council required if enacted. The Council will require further information regarding consultation with RAOs to be provided at or post the DA stage.
TCCS, now part of the CED	10 November 2022 There are no objections to the proposed Draft EIS. TCCS has requested further information on the concurrent DA.

Referred entity	Entity response
National Capital Authority	2 November 2022 The NCA advise that the built form of the proposed development is generally not inconsistent with Development Control Plan 171/94/853 as indicated in the Visual Impact Assessment. The NCA note that they have commented on the DA requesting replacement plantings on the Monaro Highway and Lanyon Drive frontages to mitigate visual impact of tree removal.
Queanbeyan-Palerang Regional Council	30 September 2022 QPRC expresses concerns about cross-border impacts, particularly noise from helicopter flights and traffic affecting existing and future residential areas in NSW. The draft EIS states that site selection criteria included avoiding sensitive residential areas, but it seems residential areas in NSW were not adequately considered. The noise assessment in the draft EIS indicates compliance with AS 2021 noise criteria. Any development approval should be conditional on not exceeding these noise standards.
Civil Aviation Safety Authority	6 October 2022 From an Aviation Safety perspective, CASA has no objections to the proposal. CASA does not regulate helicopter landing sites. The responsibility for approvals / permits and conditions is a matter for the Planning Authority. Also, as described in the Helicopter Operation Assessment, the civil aviation regulations (Civil Aviation Regulation (CAR) 92) emphasise the responsibility of operating safely in and out of a helicopter landing site rests with the pilot of the aircraft. The pilot in command of a helicopter is responsible for ensuring that a site used for landing and taking off is suitable for the purpose and at the time the flight can be conducted with safety. The Helicopter Operation Assessment does not cover deconfliction with other Helicopter Landing Sites in the general area in detail. Conflict with nearby helicopter movements is not expected to be an issue because communications with standard CTAF and Class G Airspace procedures and broadcasts followed by non-conflict flight profiles is appropriate. CASA does not advise on aircraft noise issues.
Strategic Planning	10 November 2022 Strategic Planning had the following comments: • The EIS does not explain the risks in the event the proponent loses their contracts with emergency services agencies. • No interstate examples of similar facilities immediately adjacent to an urban area are provided. • Evidence of consultation with Canberra Airport is not provided. Further detail is requested in relation to bird strike risk, and a Wildlife Management Plan is requested.
Climate Change and Energy	3 November 2022 The requirements outlined in the scoping document that concern climate change and energy are adequately addressed.
Canberra Airport	4 November 2022 Canberra Airport state their previous comments have not been addressed, and request: • Evidence of consultation with CASA, Airservices Australia, Air Traffic Control Tower Canberra Airport (ATC), ACT Emergency Services Agency and the Airport. • Proposed management of flight operations with ATC. • Information on compliance with the National Airports Safeguarding Framework (NASF) Guidelines. • Reference to Canberra Airport's 2019 ANEF Noise Contours, known obstacles in the area, and the potential conflict with the Canberra Airport arrival and departure pathways. • Further detail in relation to bird strike risk. • Further information in relation to the Noise Assessment.

The entity comments are included in this Report where they relate to each potential impact. Any matters to be considered or conditions that have been recommended by a referral entity will be included in Section 6 of this Report.

2.4.3. Request for revision of draft EIS

The Authority provided their preliminary review of the draft EIS, entity comments and public representations to the proponent. The proponent was required to revise the draft EIS to take into consideration all matters raised in representations made during public consultation, comments from the Authority and entities and to demonstrate how the matters have been taken into account in the revised EIS.

2.5. Revised EIS

On 14 July 2023, Canberra Town Planning submitted a revised EIS to the Authority pursuant to section 221 of the PD Act. A brief adequacy review was undertaken to confirm that all appropriate sections and appendices had been included. The revised application was circulated to selected entities to confirm their matters raised in earlier referrals had been addressed. Following this, the authority commenced assessment of the EIS in accordance with section 222 of the PD Act. The Authority reviewed the revised EIS for:

- adherence to the final scoping document and legislative requirements;
- consideration and incorporation of the Authority's and entity comments provided on the draft EIS; and
- consideration and response to public representations received during notification of the draft and other consultation processes.

Matters to be considered during the assessment include possible conditions of approval for any subsequent DAs for this proposal, as identified in Section 6 of this report.

Table 4 - Summary of entity comments on the revised EIS

Referred entity	Entity response
ACT Health	21 August 2023 Previous comments have been adequately addressed and there are no further public health concerns.
Icon Water	17 August 2023 • These works shall require Building Approval from Icon Water. • The Pressure pipeline cannot be located in private property. The water main either needs to relocate or the block boundary needs relocation to have the meter outside the boundary. • The Final EIS report referenced the need to enter into a trade waste discharge agreement with Icon Water. Any liquid trade waste generated during construction of the site must also be managed appropriately. If there is a need to discharge it to sewer, the proponent will need to apply for approval. The Proponent is to consider all liquid waste streams that need to discharge to sewer across the site, identify all that are non-domestic in nature, ensure they are all managed to meet our acceptance criteria and included in the application to discharge to sewer. • The developer should submit the application for "In principle" approval with proposed development to confirm the capacity of the existing network and WSCC. • The block has a DN225 water running through the western boundary. Previous advice was to relocate the boundary to have the water main in open space or to relocate the water main outside the boundary. • Currently the block in not serviced by water and sewer but there are mains along Sheppard Street which can be used to service the block.
Conservator of Flora and Fauna	10 August 2023

Referred entity	Entity response
	The documentation has been examined and the Revised EIS adequately addresses all known impacts of the proposed works as well as the concerns raised in the Draft EIS stage regarding diesel fuel storage. No additional comments.
Emergency Services Commissioner	17 August 2023 The revised EIS has been reviewed. No comments or objections. All previous commentary remains valid and expected of this DA.

ACT Heritage Council	18 August 2023
	The revised EIS broadly addressed the scoping document requirements and adequately describes the anticipated heritage impacts of the development and how these will be avoided, minimised and mitigated.
	The Council will required further information which can be provided at or post DA stage:
	• Prior to the commencement of works, the outcomes of consultation with RAOs in relation to the project are to be clarified to the satisfaction of the Council. This is to include:
	  ○ A summary of discussions held on site with RAOs;
	  ○ Confirmation that at least 10 working days were provided for RAOs for review of and comment on the Cultural Heritage Assessment (CHA);
	  ○ Provision of RAO comments from review of the CHA, and details of any further efforts made to seek comments;
	  ○ This information is to be provided to the Council, by email to heritage@act.gov.au;
	  ○ Should the Council identify any further heritage actions are required to respond to RAO comments received, these actions are to be undertaken prior to the commencement of works; and
	• The Unexpected Discovery Plan included in Appendix 2 of the CHA is to be followed during all works, noting that additional statutory approvals from the Council will be required should it be enacted.
	
	The above advice is consistent with the advice provided on the draft EIS202000027 and the associated DA2020240365. In order to avoid substantial project delays, it is advised that submission of this information is completed as soon as practicable.

Strategic Planning	17 August 2023 Relevant sections of National Airport Safeguard Framework need to be addressed.
National Capital Authority	10 August 2023 NCA requirements are adequately addressed in the EIS report. Assessment against the site Development Control Plan (DCP 171/94/853) can be addressed at the DA stage.
Queanbeyan-Palerang Regional Council	2 August 2023 Council has no further comment to make in regard to the revised EIS.
Civil Aviation Safely Authority	16 August 2023 CASA comments provided on 6 October 2022 have been adequately addressed. CASA does not object to the proposed Emergency Services, Maintenance and Training Facility at Hume; from an aviation safety perspective. The followings are administrative comment only: • Page 16 of the Helicopter Operation Assessment refers to CASA CAR 92. The CAR 92 has recently been effectively superseded by the CASR 91.410. • Page 16 of the Helicopter Operation Assessment refers to CASA CAAP 92-2(2) 'Guidelines for the Establishment of Helicopter Landing Sites'. The CAR 92 has recently been effectively superseded by the CASA ADVISORY

Referred entity	Entity response
	CIRCULAR AC 91-29v1.1 'Guidelines for helicopters - suitable places to take off and land'.
Canberra Airport	18 August 2023 Previous concerns have not been adequately addressed, and Canberra Airport has several issues regarding the proposal. • Failure to obtain consent or concurrence from Airservices Australia, Civil Aviation Safety Authority, Canberra Airport and Canberra Airport Air Traffic Control Tower. • Revised EIS and DA fails to demonstrate compliance with the National Airport Safeguarding Framework • Inconsistencies between Revised EIS and Supporting Reports/Documentation

After assessing the revised EIS and discussions with referral entities, the Authority determined that there were a number of items that were deemed 'unaddressed matters. Therefore, a notice under section 224 of the PD Act was issued to Canberra Town Planning.

2.5.1. Section 224 notice – request for further information

On 25 September 2023 a notice pursuant to section 224 of the PD Act was issued by the Authority to Canberra Town Planning (**Appendix 3**).

After seeking three extensions of time, the applicant provided a response to the Authority (**Appendix 4**) which was accepted for lodgement on 27 July 2024, and the Authority considered that the response did not address all matters of the s224 notice.

Table 5 Summary of entity comments following first s224 notice.

Referred entity	Entity response

Icon Water	15 August 2024
	• Analytical Services Team
	  ○ For sewer: the development can connect to Icon Water's urban sewer reticulation system. However, depending on the details of development, it is likely to trigger sewer augmentation, which will require detailed hydraulic assessment in DA phase.
	  ○ For water: the development meets Icon Water's water capacity standards in the existing network. However, the development's fire flow requirements of FRT5 cannot be met by the existing network. Infrastructure augmentation is required in order to meet fire flow requirements.
	• Hydraulic Asset Acceptance
	  ○ Icon Water's team is dealing with the consultant to finalise site servicing for this development.
	• Trade Waste
	  ○ In reference to Chapter 13 Table 28. ACT Entity and External Referral Comments and Response:
	  ○ Icon Water – Liquid Trade Waste (page 192/193)
	We acknowledge our comments have been noted and encourage the proponent to engage proactively with our liquid trade waste team as the project progresses to ensure our acceptance requitements can be met.

Strategic Planning	16 August 2024 National Airport Safety Framework (NASF): • The Impact team should consider Canberra Airport's comments to ensure compliance with NASF requirements.
Canberra Airport	15 August 2024

Referred entity	Entity response
	Previous concerns have not been adequately addressed, and Canberra Airport still has several issues regarding the proposal. • Flight Paths - After further evaluation of the operational implications of the proposed helicopter operations, Canberra Airport now opposes the flight paths proposed by the operator based on operational and safety grounds. • Helicopter Operations – more information and clarification required around the helicopter to be used, and helicopter movements, flight path design, air traffic control and terminal operations control. • Airspace Obstacle Limitation Surface Considerations. • Airservices and CASA Considerations – the proponent is likely to need to consult extensively with Airservices Australia and CASA, and formal advice in writing from Airservices Australia and CASA following consultation/assessment should be provided to the proponent and Canberra Airport. • Inconsistencies between Revised EIS and supporting reports/documentation. 11 February 2025 Canberra Airport has been provided with version 8 of the Helicopter Operation Assessment (Appendix A (06) of the EIS) and believes the proponent has appropriately addressed their concerns, as set out on page 17 of the assessment: *"The project site is near the air traffic CTR of Canberra Aerodrome and within currently "prescribed airspace." Airspace protection advice has been sought from Air Services Australia (ASA), the Civil Aviation Safety Authority (CASA), and Canberra Airport as part of the project consultation process. Concerning Canberra Airport and following consultation to explain the proposed development, Canberra Airport decided to withdraw all matters raised in initial and subsequent representation to EPSDD (refer to EIS attachment detailing correspondence). This withdrawal acknowledges that the project will have no material impact on aviation activities at Canberra Aerodrome, provided the proposed flight paths described in this updated assessment are adhered to."* On the basis that version 8 of the Helicopter Operation Assessment is submitted and finalised with EPSDD, Canberra Airport has no objection to the proposal proceeding.

2.5.2. Second section 224 notice

On 12 March 2025, a second notice pursuant to section 224 of the PD Act was issued by the Authority to Canberra Town Planning, requesting further information to address inconsistencies within the EIS (**Appendix 5**).

Canberra Town Planning's response to the second section 224 was not referred to entities as Canberra Airport had provided comments that they had no objection to the proposal proceeding prior to that section 224 notice being issued. Strategic Planning comments on the first section 224 notice related to Canberra Airport's comments, and Icon water comments related items that would be addressed through the concurrent DA.

After considering Canberra Town Planning's second section 224 submission, the assessment concluded that all items have been satisfactorily addressed the heads of consideration of the scoping document.

2.6. Additional public consultation

The proponent engaged Communication Link to conduct community and stakeholder consultation in line with the requirements of the scoping document, through:

- Invitations to provide feedback were emailed to a list of identified organisations and community representative groups located close to, or having a vested interest in the area surrounding the proposed facility.
- Door knocks to businesses on Sheppard Street and Arnott Street, Hume.
- Community information pop-up at Jerrabomberra Village Shopping centre.
- Community and stakeholder meetings.

There was broad general support for, or indifference to, the proposal. Primary concerns raised were in relation to potential noise and vibration impacts on nearby businesses, and nearby residential and future residential areas in NSW. The consultation report stated noise modelling and flight path clarity have, to some extent, alleviated initial concerns.

2.7. Giving the EIS to the Minister for Planning

Following the proponent's response to the second section 224 notice, the Authority has accepted the EIS under section 222 of the PD Act. The findings and outcomes of the review of the EIS are included in this report, which is provided to the Minister for Planning with the EIS in accordance with section 225. Once the Minister has received the EIS they may:

- under section 226 – choose to take no action on the EIS; or
- under section 227 – present the EIS to the Legislative Assembly; or
- under section 228 – establish an inquiry panel to inquire about the EIS. The Minister must make this decision within 15 working days of receiving the EIS from the Authority. The requirements for establishing an inquiry panel are detailed under Part 8.3 of the PD Act.

Under section 209 of the PD Act, an EIS is completed if the Minister:

a. gives the Authority a notice of no action under section 226;
b. has not decided to establish an inquiry panel to inquire about the EIS;
c. has established an inquiry panel for the EIS and:
   i) the Panel has reported the results of the inquiry; or
   ii) the time for reporting under section 230 has ended.

The Authority's recommendation to the Minister can be found in Section 8 of this report.

2.8. Lodging a development application

Once the EIS has been completed the development application, which has been concurrently submitted with the EIS in the impact track, can be determined. Any subsequent development application related to the EIS must include the completed EIS. The EIS expires five years after the day it is completed.

2.9. Documentation referenced in this report

The documentation referenced in the Authority's assessment report is summarised as follows:

- Revised EIS and supporting documentation;
- Entity comments on the draft and revised EIS and s224 notices; and
- Correspondence or additional information received from proponent.

3. Assessment of impacts

This section summarises issues identified in the scoping document that had to be assessed in the EIS. For each set of identified issues, the results of the proponent's assessment are summarised under the following headings:

- Impacts;
- Key findings;
- Mitigation; and
- Residual risk assessment.

3.1. Planning and land status

The proposal is described as for emergency services, maintenance and training facility, including a helicopter landing and departure area. The proposal site (the site) is Block 45 Section 3 Hume, at the corner of Sheppard Street and Lanyon Drive. The site is subject to the Main Avenues and Approach Routes overlay in the Territory Plan. The site is unleased land, zoned NUZ1 Broadacre and is under the custodianship of TCCS for the purpose of City Presentation. The existing surrounding land uses are Industrial and Broadacre, with residential development proposed over the border in NSW in future.

3.1.1. Impacts

The potential impacts identified in the EIS were:

- sterilisation of existing and future land uses; and
- restricting future building/structure heights along the flight path.

3.1.2. Section 224 notice

Further information was requested in the section 224 notice issued in September 2023 (**Appendix 3**). For planning and land status, the request was that the EIS provide additional information on the potential impacts to nearby existing developments of Jerrabomberra and the future development of South Jerrabomberra and Tralee in NSW.

After considering Canberra Town Planning's section 224 response (**Appendix 4**), the assessment is that the scoping document was not satisfactorily addressed.

3.1.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.1.4. Key findings

Forestrack Bushfire Response and Training proposes to develop a new headquarters and operations base in the ACT (an emergency services facility).

Under the Territory Plan 2008 (the Territory Plan), "emergency services facility" means the use of land for the purpose of providing emergency services and protection for the community. Pursuant to the Territory Plan, "ancillary use means the use of land for a purpose that is ancillary to the primary use of the land". Ancillary is a term meaning "associated with and directly related to, but incidental and subordinate to the predominant use."

Ancillary uses for the site are those that will be undertaken as a result of the emergency services facility's operations. Proposed helicopter landing and departure related to the emergency services facility may potentially be considered as ancillary to that use.

The ESA responded to the entity referral for the concurrent DA s141E application, that any development that will undertake emergency services must have approval under s63 of the *Emergencies Act 2004 (*Emergency ACT*)*. As the proposal does not have the approval under the Emergency Act, the proposal for the construction and future use of the helipad will require further assessment at the DA stage. Ancillary use(s) may also be part of such further assessment.

The EIS states that the development is not expected to affect adjacent land uses in any material manner, including visually, by way of noise impacts, or by operational requirements associated with the use (this will require further assessment at the DA stage). Emergency services facility is a permissible use in the zone, with light/general industrial and educational establishment supporting this activity, as defined in the Territory Plan.

The EIS has considered the impacts on future land use in the vicinity of the proposal, including future residential developments at South Jerrabomberra and Tralee in NSW. A number of specialist studies have informed the assessment of the potential impacts which may affect land use including a Helicopter Operation Assessment, Downwash Report, Traffic Assessment, Air Quality Assessment, and Noise Assessment. Further details of these studies can be found in sections 3.2 Traffic and Transport, 3.9 Noise and Vibration, and 3.12 Hazard and Risk of this EIS Assessment Report (EISAR). Based on the outcomes of the above studies, the proposed development is considered unlikely to sterilise existing land and future land uses in the surrounding area.

The proposed development has been assessed as unlikely to impact upon building height limitations for adjoining lands. The proposal site is bound by roads on all sides but one. The southern boundary is shared with the existing industrial zoned (IZ1) land of the Hume industrial estate, and the preferred flight path of the helicopter does not require overflying land to the south. The EIS also considered the proposed overpass over Lanyon Drive located approximately 320m from the proposed helicopter take-off/landing site. The proposed overpass is not located in the preferred flight paths, however, the Helicopter Operation Assessment showed that flight paths would achieve a gradient that would not be impeded by the overpass or associated streetlights, were the helicopter to travel in that direction. The EIS also notes that where required, vertical take-off can be performed to clear obstacles.

Strategic Planning and Policy, and the Queanbeyan-Palerang Regional Council raised no concerns in relation to planning and land status following referral of the revised EIS, and the CASA had also not opposed the proposal from an aviation safety perspective.

3.1.5. Mitigation and avoidance

The EIS concluded that mitigation measures for an emergency services development were not required for planning and land status, as the risk of impacts was low.

3.1.1. Residual risk assessment

The table below details the risks associated with planning and land status as defined in the EIS.

Table 6 Residual risk assessment (planning and land status)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after nil mitigation)	**Consequence** (after nil mitigation)	**Residual risk**
Sterilisation of existing and future land uses	Low	Unlikely	Moderate	Low
Restricting future building/structure heights along the flight path	Low	Unlikely	Moderate	Low

3.2. Traffic and transport (road and air)

The proposal is for the relocation of an existing facility on Sheppard Street, and the inclusion of a helipad. Construction and operation of the proposed facility will generate road traffic. There are ongoing upgrades to the Monaro Highway and the Lanyon Drive interchange near the site. During operation helicopter use will increase air traffic in the area. There are other helicopter landing/departure facilities (ACT Rural Fire Service and Southcare Rescue Helicopter Base) located adjacent to each other less than 1 kilometre to the north of the site, and Canberra Airport is approximately 7.5 kilometres to the north/northeast.

3.2.1. Impacts

The potential impacts identified in the EIS were:

- traffic safety impacts during operation, including traffic distractions; and
- impacts from increased air traffic.

3.2.2. Section 224 notice

Further information was requested in the section 224 notice issued in September 2023 (**Appendix 3**). For traffic and transport, the request was in relation to the following items:

- Comments from entities (Canberra Airport; Strategic Planning and Policy).
- Information in relation to safety procedures and requirements.
- Impacts on surrounding receivers and existing traffic.

After considering Canberra Town Planning's section 224 response (**Appendix 4**), the assessment was that the scoping document was not adequately addressed.

3.2.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding impacts on existing traffic, and inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.2.4. Key findings

Road traffic impacts

The EIS includes a Traffic Impact Assessment undertaken by JJ Ryan (JJR) Consulting Pty Ltd (EIS Appendix A (03)). The site is identified as being in close proximity to several National Heavy Vehicle Regulator (NHVR) approved Higher Mass Limit (HML) routes. There is no public transport or active travel infrastructure in the vicinity of the site. At the time of the assessment, future upgrades to the Monaro Highway and Lanyon Drive, including the Sheppard Street intersection were proposed and preliminary information was available that was taken into consideration in the EIS.

Traffic generated during construction is predicted to be relatively low as there are no significant cut-fill operations as part of the development, and the construction period is anticipated to be relatively short. The EIS concludes that peak construction traffic will not significantly impact the safety and efficiency of the surrounding road network.

The proposed facility has planned operating hours of 7:00 am to 6:00 pm, Monday to Friday. As the operational hours do not sit directly on peak hour, operational traffic will not impact overall peak hour movements. Occasionally an emergency response may be required at peak hour. Normal daily operation is anticipated to involve approximately 18 light vehicle and 14 heavy vehicle trips. During emergency operations, there may be about 24 light vehicle and 18 heavy vehicle trips per day. The EIS states that Signalized Intersection and Research Aid (SIDRA) analysis indicates the proposal does not exacerbate the current forecast of traffic conditions in the future.

The EIS considered the potential for distraction to motorists from operations. Helicopters taking off and landing at the site will be visible to motorists from certain viewpoints, however existing trees, warehouse buildings and the take-off and approaches generally being to the north-east away from drivers, means that views will be limited.

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 EIS concludes that there are no significant road traffic safety issues associated with the proposed development.

TCCS advised they had no comments on the EIS and would comment on the DA.

Air traffic impacts

The EIS states Helicopter traffic is expected to be a maximum of 30-35 flights per month. During bushfire emergencies flights will operate to replenish ground-based fire-fighting crews. Outside of bushfire emergency periods, flights will primarily consist of airborne bushfire surveillance, operations management support, and maintenance and refurbishment.

CASA have published 'Guidelines for the establishment and operation of onshore Helicopter landing / departure areas' CAAP 92-2(2), February 2014 (CASA Guidelines). The CASA guidelines provide guidance, interpretation, and explanation to the aviation industry, including setting out factors that may be used to determine the suitability of a place for the landing and taking off of helicopter. The CASA Guidelines rely on the pilot in command to have sound piloting skills and sound airmanship, and those visual meteorological conditions exist for flight. Entity comments provided by CASA confirmed that the responsibility of operating safely in and out of a helicopter landing site rests with the pilot. CASA also stated that they have no objections to the proposal for the helicopter landing site for the purpose of emergency services facility, from an aviation safety perspective.

The proposed helicopter landing/departure point is approximated 30 metres from the north and east site boundaries. This allows for a managed safety zone in accordance with the guidelines for the establishment of helicopter hard stand areas.

The EIS states that the proposed helicopter landing and departure site is sufficiently distant from Canberra Airport, and that arriving and departing aircraft will not create any traffic conflict with helicopters operating to and from it. The Southcare Rescue Helicopter base is located approximately 800 metres north of the site, and the EIS describes consultation with them raised no further issues. The ACT Rural Fire Service has a helipad approximately 600 metres north of the site and no comments were made in relation to proposed helicopter landings, departures or flight paths during the EIS referral process. CASA also commented that conflict with nearby helicopter movements is not expected and the responsibility is on the pilot for safe operation of the site.

The EIS states that helicopter pilots will inform the Canberra Airport air traffic control (ATC) tower of operation and comply with instructions relating to direction and height to take account of other aircraft activity in the vicinity. Operations will be conducted as required by the *Civil Aviation Act 1988* (Commonwealth) and relevant regulations, including operations in controlled airspace. All flights will be conducted under a flight plan (where needed by regulation) and always under the direction of ATC, noting that all movements in the Canberra Airport Class "C" airspace require, by regulation, a clearance and direction from ATC.

3.2.5. Mitigation and avoidance

Table 22 7 details the avoidance measures associated with traffic and transport as proposed in the EIS.

Table 7 Avoidance and mitigation measures (traffic and transport)

Proposed mitigation measures	Stage of implementation
Helicopter landing / departure area is sited with over 30m clearance to roadways (this is higher in elevation than the adjacent roadways).	Detailed design
In the event that undergrounding of powerlines in locations that cause concern to helicopter operations are not granted, the positioning of 12" Power Line Hazard Markers (balls) may be necessary.	Construction
Maintain existing screening vegetation/trees on site to limit views of helicopter take-off and landing for surrounding road users.	Construction and operation
Establishment of a Fly Neighbourly Advice (FNA) between the operator of the facility, stakeholders, communities and Government representatives that will set out an agreed operations methodology to actively manage any adverse impacts flowing from the airborne operations activity.	Prior to operation
Operational management issues associated with helicopter operations require the establishment of a Safe helicopter operations training program and an Emergency Planning and Training Plan for personnel.	Operation
Operations will be conducted as required by the Civil Aviation Act 1988 and relevant regulations, including operations in controlled airspace.	Operation
All flights to be conducted under a flight plan (where needed by Regulation) and always under the direction of Air Traffic Control (ATC) noting that all movements in the Canberra Airport Class "C" airspace require by Regulation, a clearance and direction from ATC.	Operation

3.2.6. Residual risk assessment

The table below details the risks associated with traffic and transport as defined in the EIS.

Table 8 Residual risk assessment (traffic and transport)

Potential Impact	Risk Assessment

	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Traffic safety impacts during operation, including traffic distractions	Medium	Unlikely	Moderate	Low
Impacts from Increased air traffic	Medium	Unlikely	Moderate	Low

3.3. Utilities

The proposal site contains existing utility infrastructure, and the proposed development will require connections to utilities.

3.3.1. Impacts

The potential impacts identified in the EIS were:

- impacts on existing utilities from construction and operation.

3.3.2. Section 224 notice

No further information was requested for utilities in the section 224 notice (**Appendix 3**).

3.3.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.3.4. Key findings

A site survey was undertaken to determine the location of services. The following utility assets were located within the block or adjacent verge area:

- access chambers;
- communication cabling and pits;

- electricity poles and overhead cables;
- fire hydrants;
- stop valves: and
- underground water pipes and water pits.

ACTmapi shows no easements associated with the services running through the block. The EIS considered potential impacts to electricity, gas, water, stormwater (in relation to flooding) and sewerage to be low or very low risk, therefore further assessment was not required. The EIS determined pollution of stormwater during construction and operation to be of medium risk. A Stormwater Impact Assessment was undertaken which determined that with the implementation of mitigation measures, there would be no significant impacts to stormwater systems. Potential pollution impacts are further discussed in the Materials and Waste (Section 3.4), Soils and Geology (Section 3.6), and Water Quality and Hydrology (Section 3.7) sections of the EISAR.

3.3.5. Mitigation and avoidance

Table 9 details the avoidance measures associated with utilities as proposed in the EIS.

Table 9 Avoidance and mitigation measures (utilities)

Proposed mitigation measures	Stage of implementation
Dial before you dig/services locator/clearance certificate to be implemented	Prior to construction
Works will be undertaken under the controls of an EPA endorsed sediment and erosion control plan.	Construction
Ongoing sediment and erosion control management requirements will be documented in EPA endorsed Construction and Operational Environmental Management Plans (CEMPs and OEMPs).	Construction and operation
Ongoing toxic or hazardous substance management requirements will be documented in EPA endorsed CEMPs and OEMPs	Construction and operation
Implementation of endorsed CEMP.	Construction
Spill kits maintained on-site will be used to remove any minor leak.	Construction and operation
Emergency services will be engaged to manage any serious spill.	Construction and operation
In the event that undergrounding of powerlines in locations that cause concern to helicopter operations are not granted, the positioning of 12” Power Line Hazard Markers (balls) may be necessary	Prior to operation
Implementation of endorsed OEMP	Operation

3.3.6. Residual risk assessment

The table below details the risks associated with utilities as defined in the EIS.

Table 10 Residual risk assessment (utilities)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impacts on existing utilities from construction	Medium	Unlikely	Minor	Low

3.4. Materials and waste

Hazardous materials and chemicals will be used on site during both the construction and operation phases of the development.

3.4.1. Impacts

The potential impacts identified in the EIS were:

- hazardous chemicals/materials impacting on health and environment.

3.4.2. Section 224 notice

Further information was requested on materials and waste in the section 224 notice (**Appendix 3**).

The Authority requested confirmation of whether any *Work Health and Safety Regulation 2011* schedule 11 chemicals were to be stored on site, and if they would trigger requirements under schedule 4, item 11, part 4.2 of the PD. In addition, further details of storage and disposal of used oil filters, and any hazardous material transport methods, was required.

After considering Canberra Town Planning's section 224 response (**Appendix 4**), the assessment was that the scoping document was adequately addressed.

3.4.3. Key findings

The EIS states that the storage and use of any specific hazardous materials and chemicals in large quantities is not anticipated. The EIS lists a number of hazardous substances commonly used or found in the building industry during construction. Epoxy resin and hydraulic fluids are anticipated to be used in construction and operation. The hazardous substances listed in the EIS will only be in minor quantities that do not exceed manifest quantities from schedule

11 of the *Work Health and Safety Regulation 2011* and will be documented in safety data sheets. In addition, the EIS confirms the total amount of hazardous chemicals and substances do not trigger requirements under schedule 4, item 11, Part 4.2 of the PD Act.

The EIS notes that during both construction and operation phases there is low risk to worker and public safety in transporting hazardous materials, if these materials and chemicals are spilt/released into the environment. The EIS includes a commitment to achieving the receival and delivery of goods and products, including dangerous and hazardous substances from and to its supply chain, in accordance with progressive industry (Chain of Responsibility) CoR and Work Health and Safety practices. As well as compliance with relevant Work Health and Safety and National Heavy Vehicle legislation, Standards and Codes of Practice.

Refuelling of the helicopter is proposed to take place at Canberra Airport. In rare cases a fuel tanker may be used to refuel the helicopter on site. The EIS states that any on site refuelling will take place within an area graded to a SPEL interceptor, in order to prevent uncontrolled migration of fuel.

3.4.4. Mitigation and avoidance

Table 11 details the avoidance measures associated with materials and waste as proposed in the EIS.

Table 11 Avoidance and mitigation measures (materials and waste)

Proposed mitigation measures	Stage of implementation
Ongoing toxic or hazardous substance management requirements will be documented in EPA endorsed Construction and Operational Environmental Management Plans (CEMPs and OEMPs).	Construction and operation
Should removal of soil be proposed, soil assessment report is to be prepared, in accordance with ACT EPA Information Sheet 4 'Requirements for the Reuse and Disposal of Contaminated Soil in the ACT' (2019).	Construction and/or operation
Implementation of CEMP	Construction
Known or otherwise significant potential pollutants will not be utilised for construction.	Construction
Development of a facility operation plan	Prior to operation
Implementation of facility operation plan	Operation
Implementation of OEMP	Operation
Emergency services will be engaged to manage any serious spill.	Operation
Truck wash chemicals and degreasers will be stored within enclosed bunded	Operation

sealed containers	
Runoff water / chemicals collected from truck washing activities will be treated prior to off-site disposal	Operation
All refuelling activities will be conducted within an area graded to a SPEL interceptor to prevent the uncontrolled migration of fuel	Operation
Forestrack will ensure Supply Chain Partners develop, implement and maintain their own Transport Safety Management Plan or equivalent.	Operation

3.4.5. Residual risk assessment

The table below details the risks associated with materials and waste as defined in the EIS.

Table 12 Residual risk assessment (materials and waste)

Potential Impact	Risk Assessment **Risk** (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Hazardous chemicals/materials impacting on health and environment	Medium	Unlikely	Moderate	Low

3.5. Landscape and visual

The proposal site is located in an industrial area, on the southwestern corner of Sheppard Street and Lanyon Drive, with the Hume industrial estate to the east and south. The site is characterised by cleared southern and central parts, with trees in the outer eastern and northern portions.

3.5.1. Impacts

The EIS identified the following landscape and visual impacts:

- visual and landscape impacts on the surrounding area, including lighting.

3.5.2. Section 224 notice

No further information was requested on this section in the Section 224 notice (**Appendix 3**).

3.5.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.5.4. Key findings

A Landscape Character and Visual Impact Assessment was undertaken by Lanterra Consulting Pty Ltd (Lanterra) (EIS Appendix A (09)), and the Biodiversity Assessment Report (Path Co Pty Ltd) (EIS Appendix A (04)) provided details of the existing vegetation on site. See section 3.10 of this EISAR for details of the biodiversity assessment.

The site is near the Monaro Highway, an approach route under the National Capital Plan (administered by the National Capital Authority (NCA)) and is subject to Development Control Plan (DCP) 171/94/853 for Monaro Highway East. A detailed assessment of the proposal against the visual aspects of the DCP was undertaken as part of the EIS. The EIS was referred to the NCA, who advised that the built form of the proposed development was generally not inconsistent with the DCP. The NCA noted that they commented on the concurrent DA requesting replacement plantings on the Monaro Highway and Lanyon Drive frontages to mitigate visual impacts of tree removal.

The EIS states the proposed development will comply with normal site lighting associated with external building lighting under Australian Standard AS1158: Lighting for Roads and Public Spaces (as applicable) and Australian Standard AS4282: The Control of Obtrusive Effects of Outdoor Lighting.

Warning lights are to be shown prior to take-off and landing of the helicopter. This lighting will consist of two red flashing lights visible from close range for a short period in the vicinity of the helicopter hard stand only. Night flying is not proposed.

The retention of the existing vegetation adjacent to the northern and eastern boundaries will minimise visibility of the proposed development. The most evident visual effect was concluded by Lanterra to be the minor arrival and departure of a helicopter; however, this activity is only occasional and expected to be of limited impact.

3.5.5. Mitigation and avoidance

The EIS concluded that no specific mitigation measures were required to reduce the visual impacts of the proposal as the assessment determined the impacts to be of low to negligible risk.

3.5.6. Residual risk assessment

The table below details the risks associated with landscape and visual as defined in the EIS.

Table 13 Residual risk assessment (landscape and visual)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after nil mitigation)	**Consequence** (after nil mitigation)	**Residual risk**
Significant impact of buildings from viewsheds and vantage points	Low	Unlikely	Minimal	Negligible
Significant impact of helicopter operations from viewsheds and vantage points	Low	Unlikely	Minor	Very low
Impact of lighting associated with building structures (noting that Australian Standards are required to be implemented)	Low	Unlikely	Minor	Very low
Impact of lighting associated helicopter operations	Low	Unlikely	Moderate	Low

3.6. Soils and geology

Previous land uses may have led to contamination of the site. During the construction phase of the proposed development, there is a risk of erosion, sediment transport, siltation and contamination at the site as well as stormwater networks. During operation, contamination risks are storage of hazardous material on site and uncontrolled stormwater runoff leading to soil erosion and contamination.

3.6.1. Impacts

The scoping document identified the following impacts on soil and geology:

- erosion and sediment impact from construction;
- existing contamination impacts from previous land uses; and
- contamination impacts from operation.

3.6.2. Section 224 notice

No further information was requested on this matter in the Section 224 notice (**Appendix 3**).

3.6.3. Second section 224 notice

Further information was requested in the second section 224 notice (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice, the assessment was that the requirements of the scoping document were adequately addressed.

3.6.4. Key findings

The EIS includes a Preliminary Site Investigation, conducted by Lanterra (EIS Appendix A (01)). The general topography of the block 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. 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 5% and therefore not a major concern for the proposed works.

The nearest surface water receptors are Dog Trap Creek to the north of the site and a small creek to the east, both within a 150 m radius from the site. These creeks are tributaries of Jerrabomberra Creek which is located approximately 230 m east of the site. Surface water on the site is expected to follow the topographic contours of the site and flow towards the east in the northernmost corner of the site and south to south-east in the rest of the site.

Three areas of environmental concern (AECs) were identified by Lanterra:

- AEC 1 – stockpiles of unknown source circa 1908s;
- AEC 2 – potential material imported to the site during road construction since the 1970s; and
- AEC 3 – waste debris present across the site indicating potential exposure to illegal waste dumping.

Based on the AECs identified, a number of contaminants of potential concern (COPC) associated with imported fill were looked into. The site investigation included a site walk and surface observation, soil sampling via borehole drilling and sampling from stockpile areas. The assessment criteria adopted for the investigation was based on the most sensitive land use under the zoning NUZ1: Broadacre Zone, being for residential care accommodation. The assessment of soil samples and stockpile samples revealed that concentrations of COPCs were below the adopted assessment criteria.

Based on the historical use of the site and the sampling undertaken, the site is considered suitable for land use permitted under the relevant zone development code (NUZ1 Broadacre Zone) which includes residential use and thus will support the use of the land for an Emergency Services Facility which is of a lesser sensitivity.

From the site investigation, Lanterra concluded that there was no evidence of prior fuel storage on site. Fragments of asbestos-containing materials were only observed outside the front boundary of the site. No hazardous materials were observed on the site during the assessment. EPA advice on the draft EIS that they had no further comments on the EIS and they would comment on the DA.

3.6.5. Mitigation and avoidance

Table 14Table 22 details the mitigation and avoidance measures associated with soils and geology as proposed in the EIS.

Table 14 Avoidance and mitigation measures (soils and geology)

Proposed mitigation measures	Stage of implementation
Prior to construction, a Construction Environmental Management Plan (CEMP) with a suitable unexpected finds procedure will be prepared by a suitably qualified environmental consultant to assist construction workers with managing soil that may exhibit visual or olfactory indications of contamination.	Pre-Construction
An ongoing sediment and erosion control management requirements will be documented in EPA endorsed Construction and Operational Environmental Management Plans.	Pre-construction
Implementation of endorsed CEMP	Construction
Any soil to be removed from the site will be assessed in accordance with the ACT EPA (2019) Information Sheet 4 'Requirements for the Reuse and Disposal of Contaminated Soil in the ACT' and a soil assessment report approved in writing by the ACT EPA.	Construction
Contamination through fuel migration / spills will be minimized through: • Carrying out refuelling activities within an area graded to a SPEL interceptor. • Storing truck wash chemicals and degreasers within enclosed bunded sealed containers. • Treating runoff water / chemicals collected from truck washing activities prior to off-site disposal. A trade waste agreement will be negotiated with	Construction and operation

the Icon Water to discharge treated effluent to sewerage network. A coalescing plate separator will be necessary to meet oil and grease discharge levels. • Maintaining spill kits on-site to remove any minor leak or in the event of a major spill, Emergency services will be engaged to manage serious events (if needed).	
Implementation of endorsed OEMP	Operation

3.6.6. Residual risk assessment

The table below details the risks associated with soils and geology as defined in the EIS.

Table 15 Residual risk assessment (soils and geology)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Existing geology and soils rendering the site unsuitable for the intended use	Medium	Unlikely	Minimal	Negligible
Existing site contamination rendering the site unsuitable for the intended use	Medium	Unlikely	Moderate	Low
Inadequate sediment control measures resulting in off-site contamination of waterways	Medium	Unlikely	Minor	Very low
Onsite use of fuels and chemicals resulting in leakage into surrounding soils	Medium	Unlikely	Moderate	Low

3.7. Water quality and hydrology

The site lies within the Jerrabomberra Creek catchment which is situated within the Symonston Hydrological landscape. There are no mapped watercourses, other depressions or drainage lines within the site that might contain intermittent water flows. Based on the topography of the site, surface flows and drainage would be primarily to the south, southwest and collected in the stormwater drainage systems of Sheppard Street.

Located within a 150-metre radius of the site, the nearest surface water receptors are Dog Trap Creek to the north and a small creek to the east. These channels are tributaries of Jerrabomberra Creek, which is situated 230 metres east of the site. Given the contours, surface water is expected to flow east over the northern most corner of the site and south to the south-east over the rest of the site. Direct flow from the site to Jerrabomberra Creek is not

possible.

3.7.1. Impacts

The potential impacts identified in the EIS were:

- impacts on waterways from operation; and
- impacts from stormwater runoff.

3.7.2. Section 224 notice

Further information was requested in the section 224 notice (**Appendix 3**) regarding hydrocarbon spillage prevention controls. The EIS and accompanying Stormwater Impact Assessment included details on anticipated general practices and an interceptor. Noting that the facility will store and transport hazardous material/chemicals, a Spill Management Plan was requested.

Canberra Town Planning's response (**Appendix 4**) to the section 224 notice were not adequately addressed the requirements of the scoping document, in relation to risk assessment and mitigation measures.

3.7.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.7.4. Key findings

A Hydrogeology Report was prepared by Lanterra as part of the preliminary site investigations for the EIS (EIS Appendix A (16)). The report concluded that the site is elevated well above the water table under adjacent land and there is a very low risk of water table recharge. Based on the results of the hydrogeological assessment, the risk that groundwater may be adversely affected by the construction and operational phase is considered low. Since there will be no large-scale fuel storage or other chemical storage facilities on site, groundwater monitoring is not considered necessary. However, should there be a major contaminant release during the construction or operation of the facility whereby there is a possible risk that groundwater would be adversely affected, then a groundwater investigation would be warranted.

A Stormwater Impact Assessment was also prepared by Lanterra as part of the EIS (EIS Appendix A (08)). The assessment considered potential impact from stormwater discharge from the site on the surrounding stormwater network and the Jerrabomberra Creek Catchment, particularly the Jerrabomberra Wetlands. 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, and the volumes and quality of stormwater, the site are not expected to be present any notable concerns. The site contains only gentle slopes where development will occur, limiting the potential for substantial erosion to occur. 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-off to impact on downstream waterways.

3.7.5. Mitigation and avoidance

Table 16 details the avoidance and mitigation measures associated with water quality and hydrology as proposed in the EIS.

Table 16 Avoidance and mitigation measures (water quality and hydrology)

Proposed mitigation measures	Stage of implementation
Ongoing sediment and erosion control management requirements will be documented in EPA endorsed Construction and Operational Environmental Management Plans	Prior to construction and operation
Implementation of sediment and erosion control plan to minimise risk for contaminated run-off escaping from the site and affecting the stormwater network and river catchment, including: • Installation of silt fence barriers • The placement of crushed aggregate at the site entry • A sediment control basing that is appropriately sized for the site • The construction and placement of stockpiles to reduce chances of sediment migration occurring	Construction
Implementation of CEMP	Construction
To prevent fuel and chemical spillage on site: • Aviation or other fuels will not be stored on the site and any refuelling activities will be conducted by mobile fuel trucks. • All refuelling activities will be conducted within areas graded to a SPEL treatment tank to prevent uncontrolled migration of fuel in the event of a spill.	Construction and operation

• Used oil will be stored in drums contained in self-bunded pallets until they are collected by waste contractor. Pallets will capture and hold leaks if a spill occurs. • Truck wash chemicals and degreasers will be stored within enclosed bunded sealed containers. • Runoff water / chemicals collected from truck washing activities will be treated prior to off-site disposal. A trade waste agreement will be negotiated with the entity to discharge treated effluent to sewerage network. • Spill kits will be maintained on-site to remove any minor leak. In the event of a major spills, emergency services will be engaged to manage serious events. • Used oil filters will be contained in one 200L drums for emergency purposes (with 2x 200L max.) and stored in the designated waste area prior to disposal at a recycling facility.	
Implementation of OEMP	Operation

3.7.6. Residual risk assessment

The table below details the risks associated with water quality and hydrology as defined in the EIS.

Table 17 Residual risk assessment (water quality and hydrology)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impact on waterways from construction and operation	Medium	Unlikely	Moderate	Low
Impact from stormwater runoff	Medium	Unlikely	Moderate	Low

3.8. Climate change and air quality

The climate change impacts from the development includes impacts on air quality from dust generated during construction and operation, and long-term impacts from greenhouse emissions during operation of the facility. In addition, climate change effects such as unpredictable storm events including heavy rainfalls, and hailstorms, and bushfire events could impact the effective operation of the facility.

3.8.1. Impacts

The potential climate change impacts identified in the EIS were:

- impacts from climate change;
- air quality impacts from dust or odour during construction or operation; and
- air quality impacts from operation.

3.8.2. Section 224 notice

No further information was requested on this section in the section 224 notice (**Appendix 3**).

3.8.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response to the second section 224 notice (**Appendix 6**) the assessment was that the requirements of the scoping document were adequately addressed.

3.8.4. Key findings

The EIS includes an Air Quality Assessment prepared by Lanterra (EIS Appendix A (07)). Greenhouse gas (GHG) emissions from the proposal are expected to arise from the construction and excavation works for the proposed facility. The EIS states that construction and excavation works are not expected to contribute significantly to GHG emissions due to the small scale of the project. During construction and site establishment, earthworks and material disposal are likely to generate particulate and exhaust emissions that impact air quality. During operation, heavy vehicle movements, helicopter movements, and repairs and maintenance to plant/machinery is likely to generate particulate and volatile organic compound emissions. Given the limited number of aircraft movements, the Air Quality Assessment concluded that the potential for impact in the industrial setting was negligible.

A Climate Change Assessment was also undertaken by Lanterra (EIS Appendix A (10)). The report concluded that the potential contribution of the development to urban heat island effect is negligible due to the scope and design of the development, the location of the site within an industrial estate and extensive retention of existing vegetation. Variables such as temperature, rainfall, hail, bushfire, flooding and high wind speed have the potential to increase in impact due to climate change. The EIS identified opportunities to mitigate these variables during the design, construction and operation associated to climate change.

3.8.5. Mitigation and avoidance

Table 18 details the avoidance measures associated with climate change and air quality as proposed in the EIS.

Table 18 Avoidance and mitigation measures (climate change and air quality)

Proposed mitigation measures	Stage of implementation
To reduce risks associated with climate change: • Enclosed workshops to be well ventilated, provision of reverse air conditioning system; • Design structures to Australian rainfall and runoff specifications; • Provide a stormwater detention system in accordance with MUSIC model. Stormwater tanks to harvest surface water for reuse; • Allow for overflow from stormwater sumps by grading pavement to secondary structures, install landscape stabilised earth berm along the downslope site boundary to prevent egress of stormwater from the site; • Ensure structures can withstand wind loading; • Ensure structures can support wight of hail – especially cantilever awnings; • Providing back firefighting pumps connected to rook water tanks; • Sediment and erosion installed in accordance with EPA guidelines as detailed with the CEMP; • Develop management plans for staff for risks of heat stress and no work to be carried out on high-risk bushfires days • Take weather conditions into account when planning construction work; • Waste to be fully contained in designated areas; • Ensure vegetation does not accumulate around infrastructure, right-of way and flammable materials and structures; • Ensure adequate water supplies available for firefighting resources; • Monitor the location and status of active fires that may impact operations; • Ensure maintenance of structures effectiveness and systems in relation to hail and stormwater and – inspection require prior to storm or hail event; and • Consultation with fire brigade if bush fires are burning near the facility.	Design, construction and operation.
Heat island effects will be reduced through:	Detailed design

Proposed mitigation measures	Stage of implementation
• Architectural design of the buildings - reduce radiation reflectivity by extended canter leaver awnings from the building providing shading and effective roof sheeting, cladding and concrete walls; and • Effective landscape design and retaining much of the vegetation on site.	
Dust and impacts on air quality during construction will be minimized via: • Using water sprays on stockpiles and road surfaces to suppress dust; and • Scheduling known dust generating activities during favourable meteorological conditions.	Construction
GHG emissions will be minimized via: • Use of energy and fuel-efficient construction plant and equipment; • Use of biofuels in plant and equipment; • Use of grid-sourced renewable energy supply for construction and/or on-site renewable energy generation; • Use of efficient fans and motors for the facility; • Use construction materials with lower embodied emissions such as low-carbon concrete, recycled metals and recycled construction aggregate; • Sourcing construction materials from locations close to the site; • Reuse of soil and excavated material on site; • Recycling of construction waste; and • Development of Green Travel Plans for construction and maintenance staff.	Construction and operation
Impacts on air quality during operation will be minimized via: • Design and siting of helicopter landing area to ensure adequate dispersion of emissions and avoid erosion, and landscaping of surrounding areas; • The refuelling of the helicopter will take place in a designated area which is graded to capture any fuel spillage; • Enclosed wash bays for cleaning of plant and equipment which capture sediment; • Offsite disposal of sediment from wash bays; • Sealed surfaces for all internal site traffic movements; • Maintenance of all hard stand surfaces;	Operation

Proposed mitigation measures	Stage of implementation
• Welding processes to take place in appropriated located enclosed building with air ventilation/extraction/dispersal; • Diesel fuelled vehicles to be fitted with diesel particulate filters; and • Company vehicles to be serviced to ensure emission control equipment is maintained in accordance with manufactures requirements.	

3.8.6. Residual risk assessment

The table below details the risks associated with climate change and air quality as defined in the EIS.

Table 19 Residual risk assessment (climate change and air quality)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impacts from climate change	Medium	Remote	Moderate	Very Low
Air quality impacts from dust or odour during construction or operation	Medium	Unlikely	Moderate	Low
Air quality impacts from operation	Medium	Unlikely	Moderate	Low

3.9. Noise and vibration

The proposed development includes a workshop facility, administration building, aircraft hangar and hardstand areas for manoeuvring vehicles and for helicopter take-off and landing. The proposal site is in a broadacre zone with adjacent industrial zone and roads, and both industrial and broadacre zones in the surrounding area. The nearest residence is around 900 metres from the site, and potential impacts to residential developments in NSW are also considered in the EIS.

A maximum of 30-35 helicopter flights per month is anticipated. Normal operating hours of the facility will be 7:00 am to 6:00 pm, Monday to Friday, and there will be no night-flying of helicopters.

3.9.1. Impacts

The potential impacts identified in the EIS were:

- noise impacts from operation.

3.9.2. Section 224 notice

No further information was requested on this section in the section 224 notice (**Appendix 3**).

3.9.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.9.4. Key findings

A Noise Assessment was prepared by SLR Consulting Australia Pty Ltd (SLR) (EIS Appendix A (02)) to inform the EIS. The noise assessment considered the operational noise impacts of ground activities on site as well as helicopter activity. Noise modelling was undertaken to predict operational noise at nearby receptors. The noise models included details of topography and receptors including those located in Tralee and West Queanbeyan, as well as nearby commercial developments.

Noise from ground activities

Noise generating ground activities include truck movements, loading/unloading trucks, external compressor, and activities within the workshop building such as use of hand tools (e.g. rattle gun) and spray cleaning. For the purposes of the assessment, it was assumed all sources of noise at the workshop facility were occurring simultaneously, representing a "worst-case" scenario. Predicted noise levels at existing and future residential and existing light industrial recipients were found to be compliant with the applicable Australian Standards and *ACT Environmental Protection Regulation 2005* (EP regulations). The EIS states that noise emanating from the facility will be required to comply with the EP regulations.

Noise from operation of aircraft

The proposal involves the flying of one helicopter (BELL 206 L4 Long Ranger) in and out of the site. Helicopter operations are proposed for between 7:00 am and 6:00 pm only, which is within the daytime period described in the EP regulations. Movements proposed are a maximum of two take-off and 2 landing movements to and from the northeast, and a maximum of two take-off and 2 landing movements to and from the east-northeast.

For the helicopter noise assessment, the maximum potential noise from helicopter ground operations (using a scenario with the helicopter operating at full power for a hover take-off and landing) was used for modelling.

Noise assessment criteria were developed based on the applicable Australian Standards. Helicopter noise levels were predicted for all sensitive receptors in the assessment area for the project. Predicted noise levels at residential and light industrial receptors show compliance with the adopted criteria.

SLR note that noise from airborne operations, and pre and post-flight checks conducted by the pilot are the responsibility of Airservices Australia. Airservices Australia is the Commonwealth Government body responsible for addressing aircraft "in flight" noise complaints at Australian Airports and Helipads.

The EIS recommends the implementation of a noise complaints management procedure for handling noise complaints associated with ground-based activities, such as ground running of helicopter, servicing, and other on-site noise.

SLR also considered the potential for vibration impacts from the proposal during construction and operation. Construction activities will not involve blasting of bedrock and earthworks, and site preparations are not expected to generate significant levels of vibration. It was concluded that no vibration impacts are anticipated from the proposed construction or operational activities.

3.9.5. Mitigation and avoidance

Table 20 details the avoidance measures associated with noise and vibration as proposed in the EIS.

Table 20 Avoidance and mitigation measures (noise and vibration)

Proposed mitigation measures	Stage of implementation
Noise emanating from the facility is required to comply with the *ACT Environmental Protection Regulation 2005*	Construction and operation
Implementation of "Fly Neighbourly" procedures, including: • Minimising engine warm up and shut down durations. • Increasing altitude as soon as possible	Operation

• Utilising rates of climb and descent that minimise noise over residential areas. • Utilising slower, steeper descents to reduce or avoid blade slap where practicable. • Maintaining correct flight paths after take-off. • Avoiding flying over residential areas, hospitals and schools when departing from and approaching the site. • Selecting the least noise sensitive route when flying over populous areas. • When repeated flying over the same area is necessitated, varying the flight path to avoid overflying the same structures. • Implementation of a noise complaints procedure.	
Implementation of a noise complaints management procedure including: • Recording all complaints in writing, along with details of the circumstance leading to the complaint and all subsequent actions. • Investigate the complaint in order to determine whether a criterion exceedance has occurred or whether noise has occurred unnecessarily. • Planning and implementing corrective action, as required. • Informing complainants that their complaints are being addressed and advising what, if any, corrective action is being undertaken. • Carrying out noise monitoring to confirm the efficacy of corrective actions and the compliance of activities with the relevant criteria. • Inform complainants of the implementation of the corrective action that has been taken to mitigate any adverse effects and monitoring outcome.	Operation

3.9.6. Residual risk assessment

The table below details the risks associated with noise and vibration as defined in the EIS.

Table 21 Residual risk assessment (noise and vibration)

Potential Impact	Risk Assessment **Risk** (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Noise impacts from operation	High	Unlikely	Moderate	Low

3.10. Biodiversity and nature conservation

The vegetation at the site is characterised into two broad categories, being the cleared central parts of the site (Area 1, Figure 3), and the outer eastern and northern portions of the site with a relatively intact native tree canopy (Area 2, Figure 3). While the development is mostly concentrated on the central portion of the site, some of the trees located in the north-eastern portion of the site will likely be removed to facilitate safe take-off and landing of the helicopter.

3.10.1. Impacts

The potential impacts identified in the EIS were:

- impacts from clearing of native vegetation during construction; and
- impacts on threatened flora and fauna.

3.10.2. Section 224 notice

No further information was requested on this section in the Section 224 notice (**Appendix 3**).

3.10.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.10.4. Key findings

A preliminary assessment of the biodiversity values of the site was undertaken by PATH Co in 2018 (EIS Appendix A (04)), including desktop and on-site assessments in 2018. The vegetation at the site is modified, being cleared and supporting predominantly weed groundcovers across the entire southern parts of the site.

Figure 4 - PATH Co study area and features (Biodiversity Assessment Report, PATH Co, 2020)

The northern parts of the site (Area 2) support a small but relatively intact native woodland vegetation community; however, these trees are all common species likely to have been planted less than 50 years ago. 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 species to occur at the site, with no records of any listed threatened flora within or nearby to the site.

The site is seen to provide minimal habitat values for native fauna. The native fauna habitat values of the site include limited shelter and foraging opportunities for birds provided by the native tree canopy, and limited shelter opportunities for reptiles provided by rocky outcrops. A review of the ACTmapi Significant Species database did not identify any habitat or records of any listed threatened fauna as occurring either within or immediately adjacent to the site. Threatened fauna species included in the EPBC Protected Matters Search Tool results are also considered unlikely to occur at the site on a regular basis and unlikely rely on the site for important habitat.

A targeted survey undertaken at the site for the Striped Legless Lizard (*Delma impar*) from September to December 2019, did not find any of the species at the site (or any other threatened reptile species). A number of more common reptiles were recorded during the tile surveys, but in very low numbers. Given the results of the survey combined with the site conditions and history of disturbance, it is considered highly unlikely that the Striped Legless Lizard would be present at the site.

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 is 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.

Given the assessment findings, the site is not regarded as being important in displaying a rich or otherwise unusual flora/fauna species diversity. Additional targeted surveys for listed threatened flora or fauna were not considered necessary. The site does not support any unusual landscapes, being relatively flat and situated within an industrial precinct and surrounded by busy roads and industrial uses. The Conservator of Flora and Fauna commented that the EIS adequately addressed all known impacts of the proposed works.

3.10.5. Mitigation and avoidance

Table 22 details the avoidance measures associated with biodiversity and nature conservation as proposed in the EIS.

Table 22 Avoidance and mitigation measures (biodiversity and nature conservation)

Proposed mitigation measures	Stage of implementation

Minimisation of vegetation clearing to the scope required to complete works.	Construction
Engaging a fauna spotter throughout the removal of trees and rocky outcrops to capture and relocate animals as required.	Construction
Implementation of erosion and sediment control measures.	Construction
Implementation of weed management measures.	Construction and operation

3.10.6. Residual risk assessment

The table below details the risks associated with biodiversity and nature conservation as defined in the EIS.

Table 23 Residual risk assessment (biodiversity and nature conservation)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impact from clearance of native vegetation	High	Possible	Minor	Low
Impacts on flora and fauna	Medium	Possible	Minor	Low

3.11. Heritage

There are no Registered or Provisionally Registered Heritage Sites, or any sites nominated for registration within or adjacent to the site, however the proposal has the potential to impact unknown heritage values.

3.11.1. Impacts

The potential impacts identified in the EIS were:

- impacts on unknown heritage sites/values.

3.11.2. Section 224 notices

No further information was requested on this section in the Section 224 notice (**Appendix 3**).

3.11.3. Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were adequately addressed.

3.11.4. Key findings

The EIS includes a CHA undertaken by Past Traces Pty Ltd (EIS Appendix A (11)). The assessment involved a review of previous work to gain background information and inform predictive modelling, followed by a field survey across the project area to determine if any heritage constraints apply to the proposal.

Consultation was undertaken with RAOs in accordance with ACT Heritage Council guidelines and the *Heritage Act 2004*. RAOs were provided with report details, participated in the field survey and provided guidance regarding the significance and appropriate management strategies.

The archaeological site patterning in the region reveals a landscape dominated by low-density artefact scatters, primarily around Dog Trap Creek to the northwest and Jerrabomberra Creek to the northeast. Heritage studies in the surrounding areas, particularly within the Hume Valley, have identified numerous small artefact sites concentrated on ridge lines and spur crests, reflecting a focus on creek line utilisation.

The field survey found low to moderate surface visibility was present in the project area as a result of intermittent and sparse grass coverage. Small areas of exposure, due to displaced soils, vegetation clearance, old vehicle tracks and areas of erosion were present throughout the site. No Aboriginal or historical sites were located.

Past Traces concluded there was low potential for any unrecorded heritage sites to be present within the site boundaries. As there are no known heritage impacts from the proposed project, submission of a Statement of Heritage Effects to the ACT Heritage Council is not required.

3.11.5. Mitigation and avoidance

Table 24 details the avoidance measures associated with heritage as proposed in the EIS.

Table 24 Avoidance and mitigation measures (heritage)

Proposed mitigation measures	Stage of implementation
The CHA to be submitted to ACT Heritage Council for endorsement prior to works commencing.	Pre-construction
Implementation of an Unexpected Finds Protocol for discovery of Aboriginal cultural heritage and historical cultural heritage.	Construction

3.11.6. Residual risk assessment

The table below details the risks associated with heritage as defined in the EIS.

Table 25 Residual risk assessment (heritage)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impacts on unknown heritage sites/values	Low	Unlikely	Moderate	Low

3.12. Hazard and risk

The proposed development is a facility where helicopter operations will occur, and there may be use of hazardous materials/chemicals on site associated with cleaning or mobile refuelling if required. The site is identified as a Bushfire Prone Area by the ESA.

3.12.1. Impacts

The potential impacts identified in the EIS were:

- impacts to public safety from operation, including helicopter usage;
- impacts on the facility from fire on adjacent/adjoining site;
- impact from fire or explosion at the facility;
- storage of hazardous materials/chemicals on the site that poses an impact on surrounding area;
- insufficient water supply from tanks and mains for fire suppression in the event of an emergency;
- failure to meet emergency services requirements for the site (e.g. emergency access, location of hydrants etc.);
- cease of operations due to critical infrastructure failure, or failure to secure/maintain emergency services operations;

- pilot distraction from adjacent street; and
- bird strike.

3.12.2. Section 224 notice

Further information was requested on the following items in the section 224 notice (**Appendix 3**):

- obstacle limitation surfaces (OLS); and
- Wildlife Hazard Management Plan.

Canberra Airport comments stated that references to OLS were incorrect, and review and clarification was requested. The Bird Strike Report recommended a Wildlife Hazard Management Plan, and Canberra Airport raised concerns with the associated risks. A Wildlife Hazard Management Plan was requested.

After considering Canberra Town Planning's response (**Appendix 4**) to the section 224 notice the assessment was that the requirements of the scoping document were not adequately addressed.

3.12.1.Second section 224 notice

Further information was requested in a second section 224 notice issued in March 2025 (**Appendix 5**) regarding inconsistencies around risk assessment and mitigation measures.

After considering Canberra Town Planning's response (**Appendix 6**) to the second section 224 notice the assessment was that the requirements of the scoping document were addressed.

3.12.2. Key findings

A number of studies prepared for the EIS were considered in the assessment of hazard and risk, including the Helicopter Operation Assessment and Flight Path Assessment (EIS Appendix A (06)), Helicopter Downwash Assessment (EIS Appendix A (05)), Assessment into the Intrusions of the Operational Airspace of Airports (EIS Appendix 13.1.1), Stormwater Impact Assessment (EIS Appendix A (08)), Bushfire Protection Assessment (EIS Appendix A (13)) and Bird Strike Assessment (EIS Appendix A (12)).

Helicopter operation

The Helicopter Operation Assessment addressed the risks related to pilot light distraction from existing streetlights and nearby traffic lights, flight path to and from the site, windshear, turbulence, take off splay and refuelling. The EIS found the potential for pilot distraction from the adjacent streets to be

unlikely as night-time operation of the helicopter is not envisioned. The flight paths proposed take into account predominant wind directions, potential obstacles, and noise impacts. Flights are infrequent, and paths will be predominantly over undeveloped lands.

The Helicopter Operation Assessment states the onus is placed on the pilot to determine suitable landing sites, under Civil Aviation Regulation 92. The EIS states that pilots are responsible for the safe conduct of flights, including any effects of rotor downwash upon persons or objects near a landing location. Pilots are required to ensure their flight path is clear of potential objects, and pedestrians. It is also noted from the EIS that the proposal is for training facility, and 30 to 35 flights will be scheduled per month. It is not clear from the EIS, which is for the Emergency Services purpose, require everyday flights to and from the site. Considering the nearby two helipads it is a safety concern if the site is providing training to the pilot as they are the responsible for the safe operation of the facility. This will require further assessment at the DA stage. As above CASA has advised that the final aircraft movement and safety responsibility of the individual pilot(s).

CASA advised on the EIS that they have no objections from an aviation safety perspective, and Canberra Airport advised that they have no objection to the proposal proceeding for the Emergency Services Facility.

Hazardous materials/chemicals

Refuelling is proposed to occur at Canberra Airport and there will be no bulk fuel storage on site. In rare cases a fuel tanker may be used to refuel the helicopter at the proposed facility. Truck wash chemicals and degreasers will be stored within enclosed, bunded, sealed containers. Mitigation measures to prevent any spills from entering stormwater are proposed in 3.12.5 below and hazardous materials/chemicals are discussed further in section 3.4 Materials and Waste. The EIS concludes the risk for contamination of the environment is low with the implementation of appropriate controls.

Bushfire

To address the potential impacts from fire at or adjacent to the facility, water supply demands for fire suppression, and emergency services requirements for the site, a Bushfire Protection Assessment was undertaken. Firefighting appliances including CO2, dry powder, foam and fire blanket will be available on site and Forestrack will provide safety training. The Bushfire Protection Assessment concluded that water supplies, and access and egress for the purposes of emergency services, either comply or can be designed to comply with relevant standards and requirements.

Bird strike

The Bird Strike Assessment concluded that the risk of the facility itself attracting birds was very low, however existing land uses within an 8 km radius of the site were identified as bird attractant activities and mitigation measures were recommended to bring bird strike risk to an acceptable level. A Wildlife Hazard Management Plan incorporating the recommended mitigation measures was submitted with the revised EIS and will be implemented during detailed design and operation.

Obstacle limitation surfaces

Obstacle limitation surfaces (OLS) define the airspace surrounding an airport that must be protected from obstacles to ensure aircraft flying in good weather during the initial and final stages of flight, or in the vicinity of the airport, can do so safely. The proposal site is located in the outer protection zone of Canberra Airport. The EIS states no obstacles are proposed that would impinge on the airspace.

Cease of operations

The EIS states that if operations cease due to critical infrastructure failure, or failure to secure/maintain emergency services operations, bushfire response would be largely handled by ACT/NSW authorities. It is noted that as machinery is largely field based, deployment for the construction of fire brakes and associated activities could continue if operations on site ceased. In addition, all heavy plant operators are required to make plant available at all times for firefighting purposes, so that would continue notwithstanding any termination of contracts. It is also noted that the proposed infrastructure has the potential to be repurposed for another use in future. The facility has the potential for alternative uses (subject to approval) consistent with the Hume general industrial zoning. It is also noted that an airport which includes a helicopter landing facility (as opposed to an emergency services facility) is not permitted under the former and current Territory Plan. Cessation of operations as an emergency facility would require the cessation of helicopter use and flights to and from the site unless there is a change of policy (and relevant approvals were obtained).

3.12.3. Mitigation and avoidance

Table 26 details the avoidance measures associated with hazard and risk as proposed in the EIS.

Table 26 Avoidance and mitigation measures (hazard and risk)

Proposed mitigation measures	Stage of implementation
Development of Helicopter Operation Plan including: • Safety training (including initial and recurrent training aimed at providing the safety personnel with the knowledge and skills necessary to deal effectively with an emergency at the site). • Operation of the helicopter site and facilities • Safety procedures around helicopter during ground operations • Communication systems at the site • Site emergency plan • Operation of the fire protection system	Prior to operation

Implementation of Helicopter Operation Plan	Operation
Firefighting provisions including: • A fire water point with fire hose located adjacent to the primary helicopter landing/departure area deck access point • Firefighting appliances suitable for liquid and electrical fires located in the vicinity of the primary access point, including: - ○ 1 x CO2 3.5 kg ○ 1 X Dry Powder 9.0 kg ○ 1 x Foam 90 litres ○ 1 x Fire Blanket	Operation
To reduce risks associated with hazardous materials/chemicals at the facility: • Aviation or other fuels will not be stored on the site and any refuelling activities will be conducted by mobile fuel trucks. • All refuelling activities will be conducted within areas graded to a SPEL treatment tank to prevent uncontrolled migration of fuel in the event of a spill. • Used oil will be stored in drums contained in self-bunded pallets until they are collected by waste contractor. Pallets will capture and hold leaks if a spill occurs. • Used oil filters will be contained in one 200L drums for emergency purposes (with 2x 200L max.) and stored in the designated waste area prior to disposal at a recycling facility. • Truck wash chemicals and degreasers will be stored within enclosed bunded sealed containers. • Runoff water / chemicals collected from truck washing activities will be treated prior to off-site disposal. A trade waste agreement will be negotiated with the entity to discharge treated effluent to sewerage network. • Spill kits will be maintained on-site to remove any minor leak. In the event of a major spills, emergency services will be engaged to manage serious events. • Implementation of Spill Management Plan.	Operation
Implementation of the Wildlife Hazard Management Plan, including but not limited to: • Incorporation of design options and exclusion devices to prevent roosting, nesting and perching opportunities for birds on lighting, buildings and fences; • Reassessment of bird strike risk on a regular basis to inform management actions, resource allocation and monitoring programmes.	Detailed designed and operation

Development of Emergency Planning and Training Plan for personnel addressing aircraft emergencies, medical emergencies, dangerous goods, fires and natural disasters.	Prior to operation
Implementation of Emergency Planning and Training Plan	Operation

3.12.4. Residual risk assessment

The table below details the risks associated with hazard and risk as defined in the EIS.

Table 27 Residual risk assessment (hazard and risk)

Potential Impact	Risk Assessment			
	Risk (before mitigation)	**Likelihood** (after mitigation)	**Consequence** (after mitigation)	**Residual risk**
Impacts to public safety from operation, including helicopter usage	Medium	Unlikely	Moderate	Low
Impacts on the facility from fire on adjacent/adjoining site	Medium	Unlikely	Moderate	Low
Impact from fire or explosion at the facility	Medium	Unlikely	Moderate	Low
Storage of hazardous materials/chemicals on the site that poses an impact on surrounding area	Very low	Unlikely	Minor	Very low
Insufficient water supply from tanks and mains for fire suppression in the event of an emergency	Very low	Unlikely	Minor	Very low
Failure to meet emergency services requirements for the site (e.g., emergency access, location of hydrants etc)	Very low	Unlikely	Minor	Very low
Cease of operations due to critical infrastructure failure, or failure to secure/maintain emergency services operations	Very low	Unlikely	Minor	Very low
Pilot distraction from adjacent street	Very low	Unlikely	Minor	Very low
Bird strike	Low	Unlikely	Minor	Very low

3.13. Conclusion of impact assessment

The supporting studies and the comments of relevant entities provide sufficient information on all impacts of the proposal identified above.

4. Legislative and policy considerations

A number of legislative requirements and ACT policies were considered in the preparation of this EIS as outlined below.

4.1. Planning and Development Act 2007 and Planning Act 2023

The EIS application was made under the PD Act, which has since been replaced by the *Planning Act 2023* (Planning Act). Under the transitional arrangements section 636 of the Planning Act, the PD Act continues to apply.

This proposed development did not trigger the requirement for an EIS under Schedule 4 of the PD Act. Under Schedule 4, Part 4.2 'Development proposals requiring EIS – activities', item 4 was considered. Under item 4, an EIS is required for a '…proposal for construction of an airport or airfield (other than a helicopter landing facility used exclusively for emergency services purposes, including medical evacuation, firefighting, retrieval, or rescue'. The proposal is not described as an airport or airfield, and no public passenger services 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 industrial use relates to bushfire response and training centre operations (maintenance/servicing), actions that are exempt under Schedule 4, Part 4.2, item 4 as listed above.

The Minister for Planning declared the project to be in the Impact Track under section 124 of the PD Act; therefore, completion of an EIS was required.

The scoping document for the Emergency Services Facility was issued by the Authority on 24 March 2021 and provides requirements for information that is to be provided in the EIS from planning approval. The EIS has been prepared in a manner consistent with the scoping document.

4.2. Planning and Development Regulation 2008

The EIS must be prepared in in accordance with the *Planning and Development Regulation 2008* (the Regulation). Section 50 of the Regulation outlines the requirements for the preparation of an EIS in the ACT.

The requirements of the Regulation have been met in preparation of the EIS.

4.3. Environment Protection Act 1997

The ACT Environment Protection Authority (EPA) administers the *Environment Protection Act 1997* (EP Act) which provides a framework for regulating polluting activities and protecting the environment in the ACT. The proponent has provided sufficiently detailed information to the EPA in relation to the EP Act.

In their advice on the draft EIS, the EPA had no comments. Conditions have been recommended for the associated development application.

4.4. ACT Planning Strategy

The ACT Planning Strategy provides long-term planning policy and goals to promote sustainable development, consistent with the social, environmental and economic aspirations of the people.

The EIS provides statements against each of the key themes discussed in the strategy, demonstrating that the proposal is consistent with the directions of the strategy.

4.5. Territory Plan 2008

The Territory Plan 2008 (the Territory Plan) was the statutory document that guided planning and development in the ACT at the time the EIS process commenced. It has since been superseded by the Territory Plan 2023, but the Territory Plan continues to apply to the assessment of this EIS and the concurrent DA.

The purpose of the Territory Plan is to control planning and development in the ACT in a manner which promotes 'an attractive, safe and efficient environment in which to live, work and have their recreation'. The Territory Plan manages development and land use by establishing strategic directions and plan, land uses as well as codes and criteria associated with different land uses.

The proposal site is zoned NUZ1 Broadacre under the Territory Plan, and 'emergency services facility' is listed as a permissible use within that zone. Under the Territory Plan's definition, emergency services facility means 'the use of land for the purpose of providing emergency services and protection to the community'. Assessment of the concurrent DA will include a full assessment against the Territory Plan.

4.5.1. Territory Plan Statement of Strategic Directions

The Statement of Strategic Directions sets out the principles to guide the planning and development of the ACT. These include principles relating to environmental, economic and social sustainability as well as spatial planning and urban design principles.

The EIS has identified the following planning policies as relevant to the development proposed:

- Efficient use of resources, reduce consumption, waste minimalization, encouraging reuse and recycling.
- Development is to reflect land compatibility constraints i.e., topography, drainage, geotechnical factors and consider conserving resources such as water.
- Land and water resources will be planned in accordance with integrated catchment management principles and water sensitive urban design. Policies will also focus on opportunities for multi-purpose use of resources and protection of ACT water supply.
- Appropriate activities to reduce greenhouse gas emissions will be encouraged.
- Support the preferred pattern of development and maximise accessibility.
- Minimising pollution and protecting public health and safety.
- Creating new industries, markets and products leading to new revenue streams and creation of jobs.

The EIS states that the proposal is compatible with and reflective of the principles listed above, and it is considered that the development is consistent with the Statement of Strategic Directions.

4.5.2. Territory Plan codes

Various codes apply under the Territory Plan and are considered during the assessment of development applications. The proposal will be subject to assessment against the relevant Territory Plan codes through the concurrent DA process.

4.6. ACT Planning Strategy

The ACT Planning Strategy provides long-term planning policy and goals to promote sustainable development, consistent with the social, environmental and economic aspirations of the people.

The EIS provides statements against each of the key themes discussed in the strategy, demonstrating that the proposal is consistent with the directions of the strategy.

4.7. ACT Climate Change Strategy 2019-2025

The ACT Climate Change Strategy 2019-2025 sets out the ACT Government's action plan to respond to climate change and its effects and manage the impacts on people, infrastructure, and services. The EIS has considered this Strategy and includes a Climate Change assessment that proposes a number of measures to minimising climate impacts.

4.8. Canberra's Living Infrastructure Plan: Cooling the City

Canberra's Living Infrastructure Plan: Cooling the City (2019) sets out the ACT Government's commitment to maintain and improve living infrastructure in Canberra. The EIS states the proposed retention of existing trees is consistent with recommendations that promote maximising tree canopy and permeability.

4.9. National Capital Plan

The object of the National Capital Plan (NCP) is to ensure that Canberra and the Territory are planned and developed in accordance with nationally significant planning objectives. The NCP provides guidance for the planning, design and development of Designated areas and other areas identified in the NCP with special requirements. The NCP is administered by the National Capital Authority (NCA).

The site is a block located along the Monaro Highway, which is identified under Main Avenue and Approach Routes. The site is subject to Development Control Plan 171/94/853 (DCP). The NCA advised that its requirements for the EIS report were adequately addressed, and that assessment against the relevant DCP would be addressed through the DA.

4.10. Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) (Commonwealth)

Under the EPBC Act, a referral to the Australian Government is required for proposed actions that have the potential to significantly impact on Matter of National Environmental Significance (MNES).

The proponent has conducted a self-assessment against the requirements of the EPBC Act and determined that a referral to the Australian Government is not required. This is supported by the biodiversity assessment report included with the EIS.

5. Other considerations

5.1. Principles of ecologically sustainable development

The following ecological sustainable development principles have been considered in the EIS documentation and by the Authority. It is considered that information has been provided against economic, environmental, social and equitable considerations which are contained in the EIS and inform decision-making through the implementation of the following principles.

5.1.1. The precautionary principle

The precautionary principle has been addressed in the EIS and was considered by the Authority in the preparation of this assessment report.

The EIS has provided sufficient information relating to the potential environmental impacts and has proposed mitigation measures to be implemented during construction and operation of the Emergency Services Facility. It is considered unlikely that the project would cause serious or irreversible environmental damage. The EIS identifies that a number of risks will need to be managed as ongoing and operational stages of the development.

5.1.2. The principle of inter-generational equity

The principle of inter-generational equity has been addressed in the EIS and was considered by the Authority in the preparation of this assessment report.

The EIS and supporting documentation have considered the short-term and long-term impacts and identified mitigation measures to minimise the impacts. The EIS states that the proposed development would not result in environmental or social impacts that out be detrimental to future generation.

5.1.3. The conservation of biological diversity and ecological integrity

The site does not contain any listed threatened species or ecological communities. The site is not regarded as being important in maintaining any existing natural processes or systems of the ACT. The EIS states adverse ecological impacts will be avoided where possible or minimised as far as practicably possible.

5.1.4. Appropriate valuation and pricing of environmental resources

The EIS states that the design, construction and operation of the development utilises best environmental practice.

5.2. Proponent's environment history

The EIS states that Forestrack has a clean environmental record across all of its business activities.

5.3. Canberra Airport 2020 Master Plan

The Canberra Airport 2020 Master Plan was prepared by Canberra Airport Pty Ltd. as part of the Airport's internal strategic planning processes and in accordance with the provisions of Part 5 of the *Airports Act 1996* (Airports Act) and the Regulations made under that Act.

The EIS states that the proposed development will be in line with the Master Plan as it will assist the current services within the ACT for Emergency Facilities across the ACT.

5.4. National Airport Safeguarding Framework Guidelines

The National Airport Safeguarding Framework (NASF) provides guidance on planning requirements where development affects aviation operations. This includes building activity around airports that might penetrate operational airspace and/or affect navigational procedures for aircraft. The Helicopter Operation Assessment included in the EIS outlined how the proposed development and helicopter operations addressed the NASF following guidelines:

- Guideline A – Measures for Managing Impacts of Aircraft Noise
- Guideline B – Managing the Risk of Building Generated Windshear and Turbulence at Airports
- Guideline C – Managing the Risk of Wildlife Strikes in the Vicinity of Airport
- Guideline E – Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports
- Guideline F – Managing the Risk of Intrusions into the Protected Airspace of Airports
- Guideline G – Protecting Aviation Facilities – Communication, Navigation and Surveillance
- Guideline H – Protecting Strategically Important Helicopter Landing Sites
- Guideline I – Managing the Risk in Public Safety Areas at the Ends of Runways

The ACT does not have specific planning guidelines or polices in place for deciding the proposal for Helicopter Landing Site (HLS). For those States/Territories without policies in place, above Guidelines (in addition to the associated Safeguarding Framework) provides guidance for making decision for proposal for new airport or helicopter landing facilities.

State/Territory and Local Governments are primarily responsible for land use planning in the vicinity of all airports. For ACT, CED has assessed this EIS including the location of HLS, and sought advice from the Civil Aviation Safety Authority (CASA) and Canberra Airport for Airspace protection.

Following further consultation, Canberra Airport withdrawn their previous concerns and advised that the project will have no material impact on aviation activities at Canberra Aerodrome, provided the proposed flight paths described in the updated Helicopter Operation Assessment are adhered to. This, along with decisions made by the pilot, will ensure that helicopter landing/departure sight will not pose a traffic conflict with helicopters operating to and from it.

However, the land use and limitations as an Emergency Services Facility as assessed by this EIS will require further assessment at the DA Stage to meet the requirements of the Territory Plan.

6. Recommended conditions

After considering the revised EIS, the Authority recommends DA considerations to assist with the avoidance, mitigation of adverse environmental impacts, as outlined in Table 28.

Any DA related to the completed EIS must include the DA considerations as part of the application.

Table 28 Draft Conditions of Development Approval for Emergency Services Facility

No.	Condition contents	Endorsement/approval	Construction stage	Draft condition of approval
1	General	Territory Planning Authority (TPA)	All works	All works must be consistent with the mitigation measures in Table 27 of the EIS, Emergency Services Maintenance and Training Facility – Revised, prepared by Canberra Town Planning, dated June 2025 (the EIS).
2	Utilities	Icon Water	Prior to construction	Any work(s) that is likely to impact on Icon Water infrastructure must have Icon Water acceptance prior to being undertaken.
3	Construction Environmental Management Plan (CEMP)	TPA	Prior to construction	A CEMP must be prepared and submitted to the territory planning authority (EPDImpact@act.gov.au) for endorsement. The CEMP must outline the construction conditions/methods and temporary environmental protection measures to manage the impact of construction activities, consistent with the EIS. The CEMP must include the mitigation measures proposed in the EIS and any relevant management plans including, but not limited to: a) Sediment and erosion control plan; b) Unexpected finds procedure for contamination; and c) Unexpected discovery procedure for heritage items.
4	CEMP	TPA	During construction	All works must be undertaken in accordance with the endorsed CEMP.
5	Heritage requirements	ACT Heritage Council	Prior to commencement of works	The outcomes of consultation with Representative Aboriginal Organisations (RAOs) in relation to the project are to be clarified to the satisfaction of the ACT Heritage Council (the Council). This is to include: a) A summary of discussions held on site with RAOs;

No.	Condition contents	Endorsement/approval	Construction stage	Draft condition of approval
				b) Confirmation that at least 10 working days were provided for RAOs for review of and comment on the Cultural Heritage Assessment (CHA); c) Provision of RAO comments from review of the CHA, and details of any further efforts made to seek comments; d) This information is to be provided to the Council, by email to heritage@act.gov.au; e) Should the Council identify any further heritage actions are required to respond to RAO comments received, these actions are to be undertaken prior to the commencement of works.
6	Heritage requirements	ACT Heritage Council	Prior to commencement of works	The Unexpected Discovery Plan included in Appendix 2 of the CHA is to be followed during all works, noting that additional statutory approvals from the Council will be required should it be enacted.
7	EIS supporting documentation consistency regarding operational hours	TPA	Prior to operation	The EIS states that the operating hours of the facility will be 7:00 am to 6:00 pm, however two supporting assessment reports are based on operational hours of 7:00 am to 5:30 pm: a) Helicopter Operation Assessment and Flight Path Assessment, prepared by Bob Thompson for Forestrack, dated February 2024 (Appendix A06 of the EIS); and b) Hume TRG Bushfire Response and Training Centre Noise Assessment, prepared by SLR Consulting Pty Ltd for Forestrack, dated December 2021 (Appendix A02 of the EIS). A statement is required from the author of each report above, to confirm that operation until 6 pm rather than 5.30 pm would not affect the conclusions of their assessments. The statements are to be submitted to the TPA at EPDImpact@act.gov.au. If the conclusion of a report is affected by the time change, an updated version of that report will need to be submitted to the TPA (EPDImpact@act.gov.au) for assessment and approval prior to operation.
8	Operational Environmental Management Plan (OEMP)	TPA	Prior to operation	An OEMP must be prepared and submitted to the territory planning authority (EPDImpact@act.gov.au). The OEMP must outline the measures to manage the impact of operation activities, consistent with the EIS. The OEMP must include the

No.	Condition contents	Endorsement/approval	Construction stage	Draft condition of approval
				mitigation measures proposed in the EIS and any relevant sub-plans including, but not limited to: a) Fly Neighbourly Advice b) Noise Management Plan c) Safe Helicopter Operations Training Program and Emergency Planning and Training Plan d) Facility Operational Plan e) Spill Management Plan f) Wildlife Hazard Management Plan g) Site Emergency Plan
9	OEMP	TPA	During operation	The OEMP is to be implemented during operation.
10	Noise requirements	TPA	During operation	The proposal is not to exceed Australian Standard (AS) 2021:2015 Acoustics – Aircraft noise intrusion – Building siting and construction (AS 2021) noise criteria at residential areas in NSW.
11	Bushfire protection requirements	ACT Fire and Rescue (ACT F&R)	Ongoing	The entire site is to be managed to Inner Asset Protection Zone Standards as per ACT Bushfire Management Standards 2014 Table 4, as well as the following: a) canopy cover should be less than 15% (at maturity); b) trees (at maturity) should not touch or overhang the building; c) lower limbs should be removed up to a height of 2m above ground; d) preference should be given to smooth barked and evergreen trees; e) avoid connective pathways across the ground toward a building; f) small isolated clumps need to be site specific in design; g) avoid creating fuel ladders (shrubs, bark, dropped branches, leaves etc.); h) select suitable plants (low flammability, avoid dense and elevated fine fuels); i) no plants near vulnerable building components (windows, decks); and j) leaves and vegetation debris should be removed.

7. Recommended action on this EIS

Having regard to the documentation and information provided, the Authority has assessed the Emergency Services, Maintenance and Training Facility revised EIS as meeting the requirements of Chapter 8 of the PD Act.

It is the Authority's assessment that the revised EIS has provided sufficient information to the ACT Government and the community to allow an informed evaluation of potential environmental impacts which could be attributed to the Emergency Services Facility proposal. Forestrack has proposed a range of avoidance, mitigation and management measures to reduce or avoid potential environmental impacts arising from construction and operational activities associated with the project. It is considered that any potential adverse impacts can be adequately addressed by implementing these measures and the recommended development application conditions specified in this report.

The influence of construction activity associated with the Project, and the subsequent environmental performance attributable to its ongoing operation, will be monitored by a variety of public agencies; particularly the Environment Protection Authority, Territory planning authority and TCCS. Additionally, the proposal for the construction and future use of the helipad will require further assessment at the DA stage.

The Authority's recommendation is that the Minister need take no action in relation to the revised EIS. The Minister may, however, decide to present the revised EIS to the Legislative Assembly. This action does not affect an EIS being complete in accordance with section 209 of the PD Act.

Appendix 1 – Final scoping document

Appendix 2 – Cross reference table between EIS and the final scoping document

Appendix 3 – First section 224 notice

Appendix 4 – Proponent's response to first section 224 notice

Appendix 5 – Second section 224 notice

Appendix 6 – Proponent's response to second section 224 notice