



DOC23/64680-2

24 February 2023

Mr Rodger Roppolo  
Senior Planning Officer  
NSW Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Email: [rodger.roppolo@planning.nsw.gov.au](mailto:rodger.roppolo@planning.nsw.gov.au)

Dear Mr Roppolo

**Open Water Surf Facility, Sydney Olympic Park Precinct (SSD-7942-MOD-2)  
EPA Advice on Modification**

I am writing in reply to your invitation to the NSW Environment Protection Authority (EPA) to provide comments on the proposed modification to the Open Water Surf Facility State Significant Development (SSD), located at Pod B, P5 Car Park, Hill Road, Sydney Olympic Park Precinct (Lot 71 DP 1191648).

The proposed modification includes the following changes:

- Updates to the approved Remedial Action Plan (RAP) including the retention of additional fill and alterations to the clay capping thickness composition.
- Alterations to the proposed site levels, retaining wall relocation and reconfiguration of site features, as a result of the additional fill.
- Extension of the standard construction hours to include Sunday, public holidays and night works.

The EPA acknowledges the development is located over part of the Haslams Reach North landfill, which was previously used as a car park, and is located between approximately 400m-500m from residential properties.

The EPA has reviewed the following documents:

- *Statement of Support for Section 4.55(2) Modification Application (Version 2 Ref 7869B)* completed by SJB December 2022.
- *Supplementary Remediation Action Plan (Version D)* completed by Progressive Risk Management (PRM) December 2022.

In consideration of the above, the EPA makes the following recommendations:

**Site capping**

Section 5 of the Supplementary Remediation Action Plan (RAP) states the currently approved capping method of grassed areas is a geofabric marker layer underneath 300mm of compacted clay, crushed sandstone or other suitable capping covered with 200mm of topsoil. The current

modification proposes altering the capping layer to a geofabric marker layer underneath 300mm of Virgin Excavated Natural Material (VENM) certified turf underlay materials covered with natural turf.

The EPA notes the reduced capping thickness, whilst may be still functional as a barrier will likely have a reduced lifespan and will require additional ongoing management and maintenance in the long term. The additional monitoring and maintenance regimes would need to be reflected in long term environmental management plan intended for the site.

The EPA notes section 6.4 of the Supplementary RAP identifies the Validation Report will be provided to the appointed NSW EPA accredited Site Auditor and Sydney Olympic Park Authority. Consistent with previous correspondence, the EPA recommends a NSW EPA accredited Site Auditor reviews and endorses the contamination assessment and validation reports for the development, and issues Section A Site Audit Statement and Report on completion of the development to certify suitability of the land for the proposed use. This is particularly recommended as the site will be used for recreational purposes as a wave pool facility, being more sensitive land use than its current configuration as a sealed car park.

### **Noise Impacts**

Section 6.9 of the Statement of Support states that the proposed increased construction hours to include construction on Sundays, Public Holidays and nightworks will not impact the amenity of the residents. The EPA notes the Noise Impact Assessment has not been revised to reflect the proposed change in construction hours.

The EPA recommends that the Applicant demonstrate the activities occurring during these extended work hours will not impact sensitive receptors. All reasonable and feasible noise mitigation measures should be implemented and noise limits should be considered.

Should you wish to discuss any of the matters raised above, please contact Jordan Gavel on 8275 1224 or email [jordan.gavel@epa.nsw.gov.au](mailto:jordan.gavel@epa.nsw.gov.au)

Yours sincerely



24 February 2023

**HAMISH CAMPBELL**  
**Unit Head Regulatory Operations Metropolitan**  
**NSW Environment Protection Authority**