



EF14/31079 SF18/67251 DOC19/337332-02
SSD 10300
7 May 2019

Mr Cameron Sargent
Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Dear Mr Sargent

**SSD 10300 – Coffs Harbour Cultural and Civic Space, 23-31 Gordon Street, Coffs Harbour
Secretary's Environmental Assessment Requirements (SEARs)**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide input to the SEARs for the above project.

The EPA understands that the proposed development involves a new Cultural and Civic Space located at 23-31 Gordon Street, Coffs Harbour (Lot 20 DP758258, Lot B DP346105 and Lot 123 DP749233). The EPA notes the site is in the main part of the Coffs Harbour City Central Business District.

In summary, key information requirements for the construction phase of the proposal include an adequate assessment of: Air quality impacts; Noise impacts; Soil and water management; and, Waste.

Water pollution

The EPA notes the proximity of a creek to the north, east and west of the development site and thus anticipates:

- a strong focus on measures to prevent sediment runoff during demolition and construction phases, and
- an ongoing commitment to water sensitive urban design across the development.

Soils and contamination

The EPA notes that an assessment of Acid Sulfate Soils (ASS) and a management plan would be prepared. The assessment should describe and assess the effectiveness or adequacy of any soil management and mitigation measures during construction and operation of the proposal including:

- erosion and sediment control measures, including stabilisation of discharge point
- proposals for site remediation – see *Managing Land Contamination, Planning Guidelines SEPP 55 – Remediation of Land* (Department of Urban Affairs and Planning and Environment Protection Authority, 1998)
- proposals for the management of Acid Sulfate Soil soils – see *Acid Sulfate Soil Manual, ASSMAC, 1998*.

EPA guidance material – construction and operational noise

The EPA anticipates significant demolition/construction noise and vibration impacts and operational phase noise impacts on sensitive receiver locations. The proponent should ensure that background noise monitoring and subsequent assessment of demolition/construction and operational noise impacts is undertaken in accordance with the guidance material provided in the EPA's *Noise Policy for Industry (NPI)*, published in October 2017.

The EPA emphasises that as background noise monitoring is fundamental to proper noise impact assessment, the proponent should ensure that any such monitoring is consistent with guidance provided in NPI Fact Sheets A and B.

Staging of demolition and construction works

The EPA acknowledges that the proponent may consider it useful to engage different contractors to undertake demolition, site preparation, bulk excavation, and construction stages of the project.

The EIS should clarify what measures would be adopted to ensure a seamless transition of environmental impact mitigation measures between demolition, site preparation, bulk excavation, and construction stages of the project, particularly if different contractors are to be engaged for some or all of those stages of the project.

The environmental impact statement (EIS) should assess, quantify and report on:

- site contamination,
- acid sulfate soils
- hazardous materials likely to be encountered during any demolition and site preparation
- noise impacts during demolition, site preparation, bulk earthworks and construction;
- waste management in the context of the waste management hierarchy;
- runoff control during demolition, site preparation, bulk earthworks, construction and construction-related work;
- noise impacts arising from the operation of the Space;
- water conservation, including practical opportunities to implement water sensitive urban design principles with particular regard to measures to prevent pollution to the neighbouring creek;
- energy efficiency, including practical opportunities to minimise energy consumption from non-renewable sources; and
- cumulative environmental impacts as part of the overall Space.

The proponent should ensure that the EIS is sufficiently comprehensive and detailed to allow the EPA to determine the extent of the impact(s) of the proposal. The EIS should both:

- describe mitigation and management options that will be used to prevent, control, abate or minimise identified environmental impacts associated with the project and to reduce risks to human health and prevent the degradation of the environment; and
- include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

The EPA has identified the following site specific concerns:

- (a) the need for a detailed assessment of potential site contamination, including information about groundwater;

- (b) identification, handling, transport and disposal of any asbestos waste, lead-based paint and PCBs that may be encountered during demolition (and refurbishment/re-purposing), site preparation, bulk earthworks and construction;
- (c) demolition, site preparation, bulk earthworks, construction and construction-related noise impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences;
- (d) demolition, site preparation, bulk excavation and construction phase dust control and management;
- (e) demolition, site preparation, bulk excavation and construction phase erosion and sediment control and management, including all such measures as may be necessary to prevent runoff water pollution of the neighbouring creek;
- (f) demolition, site preparation, bulk excavation and construction phase waste management, including waste classification in accordance with EPA guidelines and off-site disposal of concrete waste and concrete rinse water;
- (g) operational noise impacts on noise sensitive receivers arising from operational activities including mechanical plant and equipment and vehicle reversing movements;
- (h) operational waste management in accordance with the waste management hierarchy;
- (i) operational assessment, storage, handling, transport and disposal of any waste containing radioactive material including reference to the EPA's waste classification guidelines;
- (j) the need to minimise operational water quality impacts on surface and groundwater, especially on the neighbouring creek and practical opportunities to implement water sensitive urban design principles, including stormwater harvesting and re-use for grounds maintenance and toilet flushing; and
- (k) practical opportunities to minimise consumption of energy generated from non-renewable resources and to implement effective energy efficiency measures, including passive solar design.

Should you require clarification of any of the above please contact Geff Cramb on 02 6640 2510.

Yours sincerely



JANELLE BANCROFT
Acting Head, Environment Unit – North Coast Region
Environment Protection Authority

