

# Environmental Risk Assessment and Mitigation Measures

The following section provides recommendation for mitigation measures in response to potential impacts identified in **Section 6** of the EIS. The structure of mitigation measures is based on the DPIE's hierarchy of approaches for managing impacts identified in the *Draft Environmental Impact Assessment Guidance Series* released by DPE in June 2017, as:

- **Performance based measure** – identify performance criteria that must be complied with to achieve an appropriate environmental outcome but do not specify how the outcome is to be achieved.
- **Prescriptive measure** – require action to be taken or specify something that must not be done.
- **Management based measure** – identify one or more management objectives that must be achieved through the implementation of a management plan.

Following the implementation of appropriate mitigation measures as recommended, it is determined that the proposal will not result in any significant adverse impacts on the surrounding environment. The following table illustrates how the matters raised within the SEARs will be addressed.

This analysis comprises a qualitative assessment consistent with AS/NZS ISO 31000:2009 *Risk Management—Principles and Guidelines* (Standards Australia 2009). The level of risk was assessed by considering the potential impacts of the proposed development prior to application of any mitigation or management measures. In accordance with the SEARs, the Environmental Risk Assessment (ERA) addresses the following significant risk issues:

- The adequacy of baseline data;
- The potential cumulative impacts arising from other developments in the vicinity of the site; and
- Measures to avoid, minimise, offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the environment.

Risk comprises the likelihood of an event occurring and the consequences of that event. For the proposal, the following descriptors were adopted for 'likelihood' and 'consequence'.

Likelihood		Consequence	
A	Almost certain	1	Widespread and/or irreversible impact
B	Likely	2	Extensive but reversible (within 2 years) impact or irreversible local impact
C	Possible	3	Local, acceptable or reversible impact
D	Unlikely	4	Local, reversible, short term (<3 months) impact
E	Rare	5	Local, reversible, short term (<1 month) impact

The risk levels for likely and potential impacts were derived using the following risk matrix.

		LIKELIHOOD				
		A	B	C	D	E
CONSEQUENCE	1	High	High	Medium	Low	Very low
	2	High	High	Medium	Low	Very low
	3	Medium	Medium	Medium	Low	Very low
	4	Low	Low	Low	Low	Very low
	5	Very low	Very low	Very low	Very low	Very low

The results of the environmental risk assessment for the proposed development are presented in the below table and are based upon the range of technical and specialist consultant reports appended to the EIS. The table has directly related mitigation measures responding to each impact also based upon the range of technical and specialist consultant reports appended to the EIS.

**N.B.** 'O' – Operational; 'C' – Construction

'Pe' – Performance based mitigation measure; 'Pr' – Prescriptive based mitigation measure 'Ma' – Management based mitigation measure

SEARS	Potential Impact	Stage of Project	Likelihood	Consequence	Risk Level	Approach	Mitigation Measure (Pe/Pr/Ma)	Residual Impact
Traffic and Transport	Impacts on road network from	C & O	D	4	Low	Traffic Management	Pr	Low

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	<p>construction and operational phase.</p>					<ul style="list-style-type: none"> <li>▪ Use designated routes that avoid local roads, with minimal reliance on Oxford Falls Road, and ensure trucks enter and exit in a forward direction.</li> <li>▪ Schedule deliveries during standard hours, avoiding school peaks where possible, and prevent trucks from queuing or circulating on local streets.</li> <li>▪ Cover all truck loads during transport and enforce on-site speed limits.</li> </ul> <p>Pedestrian Safety</p> <ul style="list-style-type: none"> <li>▪ Avoid unnecessary pedestrian delays at vehicle access points.</li> <li>▪ Install clear pedestrian warning and safety signage in accordance with relevant standards.</li> </ul>		

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Site Operations

- Store all materials within the site boundaries.
- Provide facilities for equipment and tool storage to support workers using public transport.

Worker Travel and Behaviour

- Encourage public transport use by construction workers.
- Develop and enforce a driver charter outlining access and behaviour requirements.

Compliance and Induction

- Require all staff and subcontractors to complete a site induction which includes approved access routes, site access restrictions, parking arrangements, safety protocols and approved work hours

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Operational

- A Green Travel Plan (GTP) will be prepared as a condition of consent and implemented prior to operation of the site. Recommended initiatives to be investigated include:
- Travel Access Guide (TAG): A visual guide or app for staff and visitors showing public transport, walking and cycling routes, updated as transport options change.
- Public Transport Information: On-site boards or digital tools to help plan journeys and raise awareness of alternative travel modes.
- Active Transport Facilities: Secure bicycle parking, showers, change rooms, and

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						<p>wayfinding signage to encourage cycling and walking.</p> <ul style="list-style-type: none"> <li>Carpooling: A staff carpooling program to reduce single-occupancy vehicle trips.</li> </ul> <p>The GTP will be monitored and reviewed regularly, with travel surveys undertaken to assess its effectiveness. Mode share will be reviewed at least 18 months after occupation to ensure the plan is achieving its objectives.</p>		
Trees and Landscaping	Tree removal and impacts to retained trees including tree protection zone encroachments	C	D	5	Low	<p>Trees 52 and 53: Caution is required during removal, as these trees are in proximity to an overhead light cable.</p> <p>Trees 140, 146, 149, 153, 157, and 168: These trees have been identified as standing dead and should be removed to ensure the safety of contractors and site users.</p>	Pr	Low

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						<p>Trees 42, 55, 86, 107, 108, 145, and 182: These trees exhibit notable structural defects, are in decline, and display low vigour. Their condition poses a potential hazard in close proximity to the proposed development, and they should be removed for the safety of contractors and site users.</p> <p>Trees 109, 117, 118, and 160: Although these trees are unlikely to be significantly impacted by the proposed works, they are already dead or exhibit advanced dieback. As such, their removal is recommended to ensure site safety.</p> <p>Pre-construction Tree Protection measures, Site Management issues and Tree Protection measures during construction are to be implemented as set out within</p>		

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						<p>Section 7.0 of the Arboricultural Impact Assessment.</p> <p>Prior to all site works commencing, a Project arborist is to be appointed with the responsibility of implementing all Tree Protection Measures in this report as well as compliance with AS4970-2009 Protection of Trees on Development Sites. The Site Arborist is to hold qualifications equivalent of AQF Level 5.</p> <p>Storage of materials, mixing of materials, vehicle parking, disposal of liquids, machinery repairs and refuelling, site office and sheds, and the lighting of fires, stockpiling of soil, rubble or any debris shall not be carried out within the TPZ of existing trees.</p>		

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Biodiversity	Impact to existing biodiversity value of the site	C, O	D	5	Low	<p>Avoid, minimise and offset impacts to native vegetation on the site.</p> <p>Avoid impacts to the riparian corridor. Appropriate erosion and sediment controls are to be implemented to protect soil stability and water quality. This aligns with the details provided within the Civil Stormwater Management Report (Appendix M) prepared by WSCE.</p> <p>Instigate clearing protocols, including preclearing surveys, ongoing works surveys and staged clearing, using a trained ecologist or licensed wildlife handler during clearing events. Limit disturbance of vegetation and fauna to the minimum necessary to undertake the proposal.</p> <p>Use hygiene protocols to prevent the spread of weeds or pathogens. All machinery entering the site</p>	Pr, Ma	Low

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						<p>should be appropriately washed down and disinfected prior to work on the site to prevent the potential spread in accordance with the national best practice guidelines.</p> <p>Use of adaptive dust management. Stabilised surfaces should be reinstated as quickly as practical after construction</p> <p>Training of staff and conducting site briefings to communicate environmental features to be protected and measures to be implemented. Appropriate inductions should be provided prior to clearing.</p>		
Noise and Vibration	Potential noise from the following sources: <ul style="list-style-type: none"> <li>Mechanical plant</li> </ul>	O&C	D	4	Low	<ul style="list-style-type: none"> <li><b>Work Hours:</b> Limit construction to standard hours – Monday to Friday 7:00am–6:00pm, and Saturdays 8:00am–1:00pm.</li> </ul>	MA and Pe	Low

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	<ul style="list-style-type: none"> <li>▪ Operation of sports centre</li> <li>▪ Traffic</li> <li>▪ Construction and demolition work</li> <li>▪ Construction traffic</li> </ul>						<ul style="list-style-type: none"> <li>▪ <b>Quieter Methods:</b> Adopt quieter equipment and construction methods where practicable (e.g. use of rippers instead of hydraulic hammers, slower auger piling speeds).</li> <li>▪ <b>Scheduling:</b> Undertake noisy works during less sensitive periods, such as mid-morning or mid-afternoon, and avoid simultaneous operation of multiple high-noise activities near sensitive receivers.</li> <li>▪ <b>Communication:</b> Provide prior notification (letter or leaflet) to surrounding residents, schools, and community facilities advising of expected timing and duration of works.</li> <li>▪ <b>Respite Periods:</b> Implement respite periods for high noise</li> </ul>	

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						<p>activities exceeding 75 dB(A), such as:</p> <ul style="list-style-type: none"> <li>- Monday to Friday 7:00–8:00am and 12:00–1:00pm.</li> <li>▪ <b>Vehicle and Material Handling:</b> <ul style="list-style-type: none"> <li>- Use non-tonal reversing alarms where safe and practicable.</li> <li>- Avoid dropping materials into trucks and secure loads with straps instead of chains.</li> <li>- Turn off engines when idling and limit vehicle speed on-site to 10 km/h.</li> </ul> </li> <li>▪ <b>Noise and Vibration Monitoring:</b> <ul style="list-style-type: none"> <li>- Undertake monitoring during high-impact works</li> </ul> </li> </ul>		

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						<p>and in response to complaints at the nearest sensitive receivers.</p> <ul style="list-style-type: none"> <li>- Engage a qualified acoustic consultant to prepare and oversee a Construction Noise and Vibration Management Plan (CNVMP) prior to construction.</li> <li>▪ <b>Complaints and Induction:</b> <ul style="list-style-type: none"> <li>- Implement a complaints-handling procedure consistent with the acoustic report.</li> <li>- Include noise and vibration management protocols in site inductions for all workers and subcontractors.</li> </ul> </li> </ul>		

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						<ul style="list-style-type: none"> <li>▪ A detailed noise emissions assessment of all mechanical plant must be undertaken at the Construction Certificate stage once final equipment selection and locations are confirmed, identifying any additional acoustic treatments required to meet trigger levels.</li> <li>▪ The sporting precinct (including outdoor fields and indoor courts) will only operate between 7am and 10pm Monday to Saturday, and 8am to 8pm Sundays.</li> <li>▪ Waste collection and maintenance are to occur between 7am–6pm Monday to Friday and 8am–1pm Saturdays.</li> <li>▪ Façade glazing and acoustic louvres are to comply with</li> </ul>		

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						<p>minimum ratings specified in the Acoustic Report to control breakout noise.</p> <ul style="list-style-type: none"> <li>All plant and equipment are to be maintained to ensure they do not emit excessive noise.</li> </ul>		
Ground and Water Conditions	Impacts to subsurface and ground water	C	D	Low	4	<ul style="list-style-type: none"> <li>Where dust is likely to be a nuisance, suitable screens or barricades are to be adopted during demolition, excavation and building works. Water sprays are to be used to dampen down the surface and reduce dust emission where required.</li> <li>A vibration monitoring plan is required to be prepared to monitor the potential vibration effects of demolition works, during piling and excavation on existing buildings within</li> </ul>	Ma, Pr	Low

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						<p>adjoining properties, and roads along the site boundary.</p> <ul style="list-style-type: none"> <li>▪ Where any adjacent buildings (or infrastructure) are located within a zone of influence, consideration will be given to inspection pits to determine the requirement for underpinning in any affected adjacent properties.</li> <li>▪ A Geotechnical Monitoring Plan is required to be prepared to provide site specific guidance for excavation and vibration monitoring.</li> <li>▪ Earth retaining structures is required to be designed to withstand the lateral earth pressure, hydrostatic pressure and earthquake load (if applicable) pressures, and the applied surcharge loads in their</li> </ul>		

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						<p>zone of influence, including existing structures, traffic and construction related activities.</p> <ul style="list-style-type: none"> <li>Design of shallow and pile foundations is required to be carried out in accordance with Australian Standards AS2870-2011 (Reference 4) and AS2159-2009 (Reference 5), respectively.</li> <li>Any groundwater or surface water run-off that has accumulated at bulk excavation level, is required to be removed prior to concrete pouring. Any loose debris and wet soils should also be removed from excavations.</li> <li>An experienced Geotechnical Professional is required to review footing designs to ensure compliance with the</li> </ul>		

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						<p>recommendations in the geotechnical report and assess foundation excavations to ensure suitable materials of appropriate bearing capacity have been reached.</p>		
Water Management	Impacts to surface water, ground water and water quality	C	D	4	Low	<ul style="list-style-type: none"> <li>Prepare a soil and water management plan and incorporate this into the Construction Environmental Management Plan (<b>CEMP</b>). Install sediment and erosion control measures in accordance with the Blue Book (DECC, 2008). Prepare water quality monitoring plan and incorporate in the CEMP.</li> <li>Storage of hazardous goods and refuelling activities is to take place in bunded areas. Implement a water quality monitoring program. Prepare a</li> </ul>	MA, Pr	Low

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						<p>water quality monitoring plan and incorporate this plan in the CEMP.</p> <ul style="list-style-type: none"> <li>▪ Storage of hazardous goods and refuelling activities is to take place in bunded areas.</li> <li>▪ Excavations are to be minimised below the groundwater table. Minimise the duration of time where excavations below the water table are open/occur.</li> <li>▪ Where practical and where space allows, adopt WSUD guidelines for drainage infrastructure (appropriate plant species selection, etc).</li> <li>▪ Install impermeable liners or redesign to shallower depth stormwater basins where they may intercept groundwater.</li> </ul>		

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Waste Management

- Contaminated material stockpiled on site will be minimised as far as possible and are to be stored on HDPE liner, in a bunded location which is protected from inclement weather;
- Sediment fences are to be installed around the base of stockpiles and the stockpiles should be covered. Where excavated material requires validations, samples should be taken for NATA laboratory testing as per the requirements of the contamination assessment prior to restoration works, backfilling exercises and disposal.
- Any trucks carrying contaminated materials are to be securely and completely

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						<p>covered immediately after loading the materials (to prevent windblown emissions and spillage) and must be licensed by the NSW Environmental Protection Authority (EPA);</p> <ul style="list-style-type: none"> <li>▪ Decontamination of all equipment prior to demobilisation from the site is important so that contaminated materials are not spread off-site.</li> <li>▪ Wherever practical, excavation material will be reused as part of the development;</li> <li>▪ Excavation material that is not natural (virgin) material will be transported to an approved landfill site or off-site recycling depot;</li> </ul>		

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						<ul style="list-style-type: none"> <li>A waste classification assessment of the fill material will be undertaken prior to it being acceptable for waste disposal purposes;</li> <li>Transportation routes for excavation material removed from site will be identified and used.</li> </ul>		
<b>Hazardous Material</b>	Impacts from hazardous materials found onsite	C, O	C	3	Medium	<p>All works associated with the disturbance and removal of bonded asbestos containing materials must be undertaken by a Licenced Class B Asbestos Removalist.</p> <p>As potentially friable asbestos has been identified on site, all works associated with the disturbance and removal of friable asbestos containing materials must be undertaken by a Licenced Class A Asbestos Removalist.</p>	Pr, Ma	Low

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The asbestos removalist must prepare an Asbestos Removal Control Plan for the proposed works. The control plan should include an allowance for asbestos air fibre monitoring during the removal and thorough clean up works upon completion of the removal works.

An asbestos management plan must be prepared for the proposed works in areas containing asbestos. A clearance inspection must be undertaken on completion of works and prior to any other construction activities being undertaken.

If previously unidentified materials (suspected of containing asbestos) are identified during the demolition phase, works should cease, and the material should be inspected and classified by an experienced consultant. The area should be

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						<p>isolated and barricaded until the material has been classified as non-hazardous or removed and the area cleared.</p> <p>PCB work is to be conducted in accordance with the <i>Environmental Protection &amp; Heritage Council's Polychlorinated Biphenyls Management Plan, Revised Edition April 2003</i>. This includes:</p> <ul style="list-style-type: none"> <li>- Prior to demolition when the power is disconnected, inspect the light fittings;</li> <li>- Metal PCB containing capacitors are to be removed, placed in plastic lined 200 litre drums and disposed of as PCB Scheduled Waste. Any light fitting that shows signs of oil staining from capacitors</li> </ul>		

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						<p>is to be disposed of as PCB contaminated;</p> <ul style="list-style-type: none"> <li>- Protective clothing including eye protection, PCB resistant gloves and overalls are to be worn;</li> <li>- Contaminated gloves and disposable coveralls are to be disposed of as PCB contaminated waste; and</li> <li>- Contractors licenced to transport and handle PCBs must be used for transport and disposal.</li> </ul> <p>All SMF containing materials must be removed in accordance with the national Standard and code and by an experienced hazardous materials removal contractor.</p>		

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Aboriginal Heritage	Impacts to traditional lands of the Caregal People	C	E	5	Very Low	<p><b>Unexpected Finds Protocol</b></p> <p>Should any archaeological deposits be uncovered during any site works within this portion of the subject area, the following steps must be followed:</p> <ol style="list-style-type: none"> <li>1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment. The find must be cordoned off and signage installed to avoid accidental impact.</li> <li>2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.</li> </ol>	Pr	Very Low

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						<p>3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW and the project RAPs, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System (AHIMS).</p> <p>4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken in</p>		

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						<p>consultation with the RAPs for the project. 5. Reporting may need to be prepared regarding the find and approved management strategies. 6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.</p> <p><b>Human Remains Procedure</b></p> <p>In the unlikely event that clearly identifiable human remains are uncovered during any site works, the following protocols must be undertaken:</p> <ol style="list-style-type: none"> <li>1. All works within the vicinity of the find must immediately stop. The find must be cordoned off and signage installed to avoid accidental impact.</li> <li>2. The site supervisor or other nominated manager must notify</li> </ol>		

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						<p>the NSW Police and Heritage NSW (Enviroline 131 555).</p> <p>3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.</p> <p>4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives in consultation with the RAPs for the project.</p> <p>5. Works are not to recommence until the find has been appropriately managed.</p>		
Social Impact	Cumulative social impact from the proposed development on surrounding residents and stakeholders	C, O	D	4	Low	<ul style="list-style-type: none"> <li>Traffic and Access: Prepare a detailed Construction Traffic and Pedestrian Management Plan prior to works, outlining vehicle routes, on-site parking for workers, and safe pedestrian arrangements. This</li> </ul>	Ma	Low

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						<p>aligns with the recommendations of the TAIA prepared by JMT Consulting.</p> <ul style="list-style-type: none"> <li>▪ Noise and Vibration: Implement the recommendations of the Noise and Vibration Impact Assessment prepared by JHA, including a Construction Noise and Vibration Management Plan and community notification protocols.</li> <li>▪ Communication: Maintain ongoing engagement with residents, local schools, and Council throughout design and construction, with a community register and dedicated liaison officer.</li> <li>▪ Environment: Implement erosion and sediment control measures, as noted in the Civil Stormwater Management</li> </ul>		

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						<p>Report prepared by WSCE and replant native vegetation to enhance the riparian corridor and local habitat.</p> <ul style="list-style-type: none"> <li>▪ Accessibility: Provide temporary pedestrian diversions, if impacts on existing access are required during construction and ensure accessibility for all users, including people with disability.</li> <li>▪ Operation: Post-approval, explore partnerships with local sporting clubs and Council and develop a Plan of Management for community access as a Condition of Consent prior to occupation.</li> </ul>		
Bushfire Risk	Potential risk of impact from bushfire events.	O	C	3	Medium	<ul style="list-style-type: none"> <li>▪ The entire site must continue being maintained as an APZ in accordance with the NSW RFS</li> </ul>	Pr, Ma	Medium

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						<p>Standards for APZs and PBP 2019.</p> <ul style="list-style-type: none"> <li>▪ Water, electricity and gas supplies through the proposed development must comply with section 6.8.3 of PBP 2019. for the proposed Sports Complex.</li> <li>▪ The Indoor Sports Centre is to be constructed in accordance with BAL-12.5 of Australian Standard AS 3959-2009 Construction of buildings in bushfire prone areas (AS 3959-2018).</li> <li>▪ Prior to occupation of the site, a Bush Fire Emergency Management and Evacuation Plan is to be prepared.</li> </ul>		