

Your reference: SSD 7942

Mr Cameron Sargent  
Team Leader  
Key Sites Assessments  
GPO Box 39  
SYDNEY NSW 2001

Attention: Mr Andrew Hartcher

Dear Mr Sargent

**RE: URBNSURF Sydney, Pod B P5 Carpark, Hill Road, Sydney Olympic Park**

The Environmental Impact Statement (EIS) for the above State Significant Development (SSD) was referred to Sydney Olympic Park Authority (the Authority) for comment on 7 July 2017. The Authority has reviewed the submitted application and provides the following comments, supported by recommended conditions of consent at Appendix A.

**Parklands Plan of Management**

Under the Sydney Olympic Park Authority Act 2001 (SOPA Act), a Parklands Approval Permit is required for the development to proceed. The applicant should be advised that this permit can be applied for following determination of the application, when final consent conditions are known.

**Ancillary activities**

The EIS flags the potential for ancillary activities at the facility, including private and corporate functions and art/ music/ film events. In addition, special surf league and surf competition events are proposed to be held several times a year. The Authority seeks further information with relation to these ancillary activities, in particular the expected frequency of events, duration of events (start/ finish times) and any likely impacts, such as additional noise, traffic and increased lighting.

**Fauna management during construction**

The Authority has reviewed the proposal and notes that the proposal is within close proximity to habitat for endangered fauna species such as the Green and Golden Bell Frog. The Authority has included recommended conditions at Attachment A for inclusion to protect these species during the removal of the existing swales should consent be granted.

**Water Cycle Management**

Generally, the Water Cycle Management Plan complies with the Authority's water policy requirements. Given the sensitivity of the locality, the Authority has provided a recommended condition that the Construction Sediment and Erosion Plan be submitted to the Authority for approval.

**Pest fauna management during facility operation**

The Authority recommends that an operating plan be prepared to identify pest fauna management measures to be applied during the operation of the facility. Pest fauna species include waterbirds, scavenging ibis and biting insects.

### **Traffic**

The EIS refers to Holker Busway as an entry and exit point for service and also staff vehicles. The Authority has already had discussions with the applicant with regard to this issue and has agreed that permits can be supplied for a limited number of service vehicles to use Holker Busway. However, staff parking must be contained within the general parking area. The applicant was also advised that service vehicles may be restricted during major events, including the 'bump in' and 'bump out' periods. These limitations would be enforced in any permit conditions.

With regard to construction traffic, the applicant should be made aware that restrictions to truck movements and road closures may occur during major events and as such the traffic management plan within the Construction Environmental Management Plan (CEMP) should be updated to reflect this.

### **Remediated Lands**

The Authority notes that 'Area B excavation' in the south west portion of the site will be located on remediated lands. While this landfill is not regulated by the NSW EPA and therefore does not require EPA approval to undertake the works, the management of waste material needs to be addressed. As such, the Authority has recommended the inclusion of a Groundwater and Leachate sub plan in the CEMP to be submitted to the Authority for approval.

### **Lighting**

It is noted that sports lighting poles are proposed to be installed around the lagoon. Given the close proximity to endangered fauna species, the Authority supports the recommendations of the Applied Ecology (24 February 2017) fauna report with regard to directing all lighting downward and using energy efficient lamps and by ensuring that all outdoor security and display lighting is fitted with quality shielded flood lights and energy efficient lamps which are directed at the target area only.

The Authority has provided additional recommended conditions with regard to lighting as it should be noted that Australian Standard AS 4282: 1997 Control of the Obtrusive Effects of Outdoor Lighting does not address ecological impacts of artificial night lighting, it is concerned only with human impacts. The Authority considers it is not sufficient to require the applicant to only comply with this standard.

### **Construction Environmental Management Plan**

The Authority has reviewed the CEMP and provides the following comments:

#### Emergency

It is noted that the draft CEMP refers to Department of Environment and Conservation staff in response to an emergency. The relevant reference should be Environment Protection Authority (EPA). The Authority should also be made aware of any environmental incidents.

#### Sediment and Erosion Control

- In relation to asbestos stockpiles, these should be secured to restrict access and have appropriate signage. Stockpiles should be kept moist to prevent the generation of dust and be bunded to prevent runoff. These measures should be included as they represent best practice in managing asbestos wastes.
- The draft Sediment and Erosion Control Plan indicates that all erosion and sediment controls will be checked by the Project Supervisor twice weekly or immediately after rain events to ensure they are maintained in a fully functional condition. However, as a minimum, inspection should also occur immediately before predicted rain events.

Following rain events, the controls should not only be inspected, but all necessary work required to re-instate them should be undertaken immediately.

#### Remediated Lands

- Based on the drawings in the draft CEMP the smaller excavation area (Area B excavation) in the south west portion of the site will be located on the remediated lands. This landfill is not regulated by the NSW EPA and therefore does not require EPA approval to undertake works.
- The CEMP will need to address management of contaminated wastes, PASS / ASS which may be present and leachate. Any groundwater encountered in the area of the remediated landfills is classified as liquid waste (leachate) and must be managed as such and cannot be discharge to receiving waters.
- Leachate must be captured and contained and managed in a way that keeps it separated from stormwater or other runoff from the site to minimise generation. It must be tankered off site for disposal to a facility that can lawfully receive liquid waste.
- The potential for landfill gas is likely to be low, but should also be noted in the CEMP, particularly in the areas of deeper excavation and the excavation in the south west on the Haslam's Reach Remediated Landfill
- The potential presence of PASS / ASS should be considered, and relevant information incorporated into the CEMP with a commitment to prepare and implement a PASS/ASS Management Plan if required.

#### Waste Management

- All waste sent off site must be classified in accordance with the NSW EPA Waste Classification Guidelines and disposed of at a facility that can lawfully receive that waste.
- All weighbridge docket and waste classification reports are retained and made available to the Authority if requested.

Subject to the above issues being satisfactorily addressed by the proponent, the Authority supports the proposed development, with the inclusion of the recommended conditions at Attachment A being included in any approval.

Should you require any clarification in relation to this submission, please contact me on (02) 9714 7145 or at [Alix.Carpenter@sopa.nsw.gov.au](mailto:Alix.Carpenter@sopa.nsw.gov.au)

Yours sincerely,



**Alix Carpenter**  
Manager, Planning

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## Recommended Conditions of Consent

### Fauna management during construction

1. A suitably licenced and experienced ecologist must be on site during the removal of the vegetated swales, for the purpose of locating and relocating fauna inhabiting these swales. Removal of the swales is not to occur on days when the maximum temperature is forecast to exceed 32 degrees celsius, to avoid distress to fauna during searching and relocation.
2. All release sites for salvaged fauna are to be approved by Sydney Olympic Park Authority.

### Lighting

1. All lighting shall be designed and operated in a manner that excludes upwards-pointing lights, and minimises lightspill to Narawang Wetland and Haslams Creek habitats.
2. The luminaire design of the sports lighting poles shall include cut-off fixtures such that all light is directed downwards to the target area. Tall sports lights shall only be operated during the approved facility operating hours.
3. Outdoor security and display lighting shall be fitted with cut-off fixtures such that light is directed at the target area only.
4. Sign lighting shall be directed downwards at the target area only.
5. Upwards-pointing searchlights (eg as event markers) shall not be used.

### Water Cycle Management

1. Emergency discharge of any lagoon water must be via the existing stormwater outlet point at Nuwi Wetland and then be directed into Haslams Creek.
2. Adequate scour protection must be installed at the discharge point at Nuwi Wetland prior to the initial filling of the Lagoon. This must be installed to the satisfaction of Sydney Olympic Park Authority's Executive Director, Operations.
3. The Sydney Olympic Park Authority is to be advised of any proposed discharge of lagoon water at least one business day in advance of the planned discharge, and as soon as practicable in the event of an emergency discharge. No discharge rate is to exceed 130L/s.
4. Discharge water quality, temperature and quantity must comply with requirements of the Protection of the Environment Operations Act 1997.

### Pest fauna management during facility operation

1. The Operating Plan shall identify pest fauna management measures to be applied during the operation of the facility. Such measures shall be designed to minimise harm to fauna and shall be approved by Sydney Olympic Park Authority. Pest fauna includes waterbirds, scavenging ibis, and biting insects.

### Construction Environmental Management Plan (CEMP)

Prior to the commencement of excavation and construction works, the applicant shall prepare and implement a Construction Environmental Management Plan (CEMP). The CEMP must outline the environmental management practices and procedures that are to be followed during construction. The CEMP is to be prepared in accordance with the *Guideline for the preparation of Environmental Management Plans (Department of Infrastructure, Planning and Natural Resources, 2004)*. The CEMP must include, but is not limited to:

- a description of activities to be undertaken during construction of the proposal (including staging and scheduling);

- the hours of work permitted for construction activities under the consent;
- a description of the roles and responsibilities for relevant employees involved in the construction of the proposal, including emergency and out of hours contact details, relevant training and induction provisions for ensuring that employees, including contractors and sub-contractors, are aware of their environmental and compliance obligations under these conditions of approval;
- an environmental risk analysis to identify the key environmental performance issues associated with the construction phase;
- a **Construction Traffic and Pedestrian Management Plan** prepared in consultation with Sydney Olympic Park Authority, to ensure traffic and access controls are implemented to avoid or minimise impacts on traffic, pedestrian and cyclist access, and the amenity of the surrounding environment;
- a **Construction Noise and Vibration Management Plan** prepared in consultation with Sydney Olympic Park Authority, to detail how construction noise and vibration impacts will be minimised and managed;
- a **Construction Air Quality Management Plan** to detail how construction impacts on local air quality will be minimised and managed. This plan must include identification of potential sources of airborne pollutants and how these will be monitored and managed;
- a **Construction Waste Management Plan** to detail how waste generated during construction will be classified, handled, reused and disposed of;
- an **Asbestos Management Plan** to detail procedures should asbestos be detected on the site; and
- an **Unexpected Finds Protocol** to establish a response should waste and/ or contamination be detected either at or below the ground surface.

The CEMP must include procedures for its periodic review and update (including updating the required sub-plans), as necessary.

The CEMP must be submitted for the approval of the Certifying Authority. The Certifying Authority must not approve the CEMP unless all relevant sub plans have been approved as required by this consent.

### **Construction Environmental Management Plan – Sub Plans**

As part of the CEMP for the proposal, the Applicant must prepare and implement:

1. A **Construction Soil and Water Management Plan** to manage soil and water impacts during construction of the proposal. The Construction Soil and Water Management Plan must be approved by Sydney Olympic Park Authority's Executive Director – Operations. The Construction Soil and Water Management Plan must be prepared in accordance with the provisions of the "Blue Book" Part 1 [Landcom (2004) Managing Urban Stormwater: Soils and Construction, 4th edition]. The Construction Soil and Water Management Plan must consider likely stages of the works and provide for appropriate control of sediment and erosion for each stage and include, but not be limited to:
  - a. location and extent of all necessary sediment and erosion control measures for the site;
  - b. all relevant details and calculations of the sediment basins including sizes, depths, flocculation, outlet design, all relevant sections, pump out systems, and depths;
  - c. location of any temporary stockpiles (soil, spoil, top soil or otherwise) and accompanying sediment and erosion control measures;
  - d. location and details of all vehicle wash down bays and associated erosion and sediment control measures such as earthen bunds; and

- e. A daily and weekly site inspection checklist consistent with IECA Best Practice Erosion and Sediment Control documents.
- 2. A **Groundwater and Leachate Management Plan** prepared by a suitable qualified professional to detail the excavation works on the remediated lands for the approval by Sydney Olympic Park Authority's Executive Director – Operations.
- 3. A **Major Events Management Plan** to detail how construction activities will be managed during Major Events. The Major Events Management Plan must be approved by Sydney Olympic Park Authority's Executive Director – Operations.

End of Recommended Conditions