



DOC17/620303-01
SSD 8967

Ms Ellen Mannix
Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

18 December 2017

Dear Ms Mannix

SSD 8967 – AUSTRALIAN STEAM NAVIGATION COMPANY BUILDING (BAYS 4 AND 5) THE ROCKS – SEARs

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

The EPA understands that the proposed development involves demolition of derelict tenancies and construction of new floors and associated works to facilitate future commercial tenancies in parts of the heritage listed ASN Company building at the corner of Hickson Road and George Street, The Rocks.

The EPA anticipates that given the derelict tenancies include theatre spaces, asbestos containing materials, lead-based paint and polychlorinated biphenyls (PCBs) (associated with electrical equipment and fittings) may be encountered during demolition and redevelopment work.

The EPA notes the proximity of the development site to the waters of Sydney Harbour.

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

- hazardous materials likely to be encountered during demolition and site preparation;
- noise impacts during demolition and construction;
- waste management in the context of the waste management hierarchy;
- runoff controls during demolition, construction and construction-related work;
- noise impacts arising from the operation of the redeveloped tenancies;
- water conservation, including practical opportunities to implement water sensitive urban design principles;
- energy efficiency, including practical opportunities to minimise energy consumption from non-renewable sources; and
- cumulative environmental impacts as part of the overall campus.

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:

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- (a) 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
- (b) 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 based on the information (including the draft SEARs) supplied to it by Department of Planning and Environment:

- (a) identification, handling, transport and disposal of any asbestos waste, lead-based paint and PCBs that may be encountered during demolition, site preparation and construction;
- (b) demolition, 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;
- (c) demolition, site preparation, bulk excavation and construction phase dust control and management,
- (d) demolition, site preparation, bulk excavation and construction phase erosion and sediment control and management;
- (e) 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 rinse water;
- (f) operational noise impacts on noise sensitive receivers (especially surrounding residences) arising from operational activities such as waste collection services and mechanical services (especially air conditioning plant);
- (g) operational waste management in accordance with the waste management hierarchy;
- (h) practical opportunities to minimise consumption of potable water; and
- (i) practical opportunities to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures, including passive solar design.

Should you require clarification of any of the above please contact John Goodwin on 9995 6838.

Yours sincerely



JACINTA HANEMANN
Regional Manager Operations, Metropolitan Infrastructure
Environment Protection Authority