



DOC19/55210-1

Ms Ellen Mannix  
Planning Officer  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Mannix

I refer to the Department of Planning and Environment's letter dated 21 January 2019 requesting the NSW Environment Protection Authority's (EPA) input on the State Significant Development Application for the development of Student Accommodation at 13-23 Gibbons Street, Redfern (SSD 9194) (the proposal).

Based on the information provided, the proposal does not constitute a Scheduled Activity under Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act). The EPA does not consider that the proposal will require an Environment Protection Licence under the POEO Act. The EPA understands that the proposal is not being undertaken by or on behalf of a NSW public authority. The EPA is therefore not the appropriate regulatory authority for the proposal.

The EPA has provided general recommendations that should be considered in relation to the proposal. Please see **Attachment A** for details.

If you have any questions in relation to this letter please contact Mr Mark Hanemann on 9995 6845 or via email at [mark.hanemann@epa.nsw.gov.au](mailto:mark.hanemann@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Erin Barker'.

**ERIN BARKER**  
**A/Director Sydney Industry**  
**Environment Protection Authority**

*Attachment A – EPA general considerations for the development of Student Accommodation at 13-23 Gibbons Street, Redfern (SSD 9194)*

23 January 2019

## **ATTACHMENT A**

### **EPA general considerations for the development of Student Accommodation at 13-23 Gibbons Street, Redfern (SSD 9194)**

#### **Noise**

The proponent should prepare a Noise Management Plan covering the construction phase of the proposal. The NMP should be prepared in accordance with the EPA's *Interim Construction Noise Guideline* (2009).

#### **Water**

In general development should maintain or restore the community's uses and values of waterways, including human and environmental health, through the achievement of relevant NSW Water Quality Objectives (WQO). The proponent should:

- Outline opportunities for the use of integrated water cycle management practices and principles to optimise opportunities for sustainable water supply, wastewater and stormwater management across the development.
- Detail how the proponent will ensure that any seepage waters from basement or underground car parking areas is undertaken in a manner that will prevent pollution of waters. Consideration should be given to waterproofing or "Tanking" all basement levels likely to interfere with an aquifer, to prevent the need for treatment and discharge of groundwater.

Sewage overflows have been identified as one of the major contributors to diffuse source water pollution in urban environments. The proponent should detail whether the existing sewage reticulation system can cater for any new additional load. Information should be provided on whether any additional load will impact the system's environmental performance, especially in relation to sewage overflows from any existing sewage pumping stations and discharges from any associated Sewage Treatment Plant. The EPA considers that that for new systems there should be no pollution of waters as a result of overflows during dry weather, and that overflows during wet weather should be minimised.

#### **Waste Management**

The proponent should provide details of how waste will be managed during construction and operation, with reference to relevant EPA guidelines. This includes identifying, characterising and classifying all waste that will be generated during the construction and operational phases, and detailing the measures proposed to manage, reuse, recycle and/or safely dispose of waste.

The *Waste Not Development Control Plan (DCP) Guideline* (EPA 2008) should be referenced by the proponent. This guideline provides suggested planning approaches and conditions for planning authorities to consider at the development application phase in relation to waste minimisation and resource recovery. This includes consideration of demolition and construction waste and the provision of facilities and services to allow the ongoing separation, storage and removal of waste and recyclables.

The EPA's *Multi-Unit Development Guidelines* provide waste and recycling requirements for multi-unit residential developments. The guidelines can be accessed at:  
<http://www.epa.nsw.gov.au/warrlocal/multi-unit-dwell.htm>