

DOC18/911826-02

Mr Brendon Roberts Team Leader – Key Sites Assessments Department of Planning & Environment GPO Box 39 SYDNEY NSW 2001

Dear Mr Roberts

I refer to the Department of Planning and Environment's letter dated 26 November 2018 requesting the NSW Environment Protection Authority's (EPA) input on the Secretary's Environmental Assessment Requirements (SEARs) for the adaptive reuse of the Royal Hall of Industries, 1 Driver Avenue Moore Park (SSD 9726) (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 for SEARs 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.

Yours sincerely

Trin Secker

ERIN BARKER Unit Head Sydney Industry Environment Protection Authority

4 December 2018

Attachment A - EPA general considerations for SEARS for the adaptive reuse of the Royal Hall of Industries, 1 Driver Avenue Moore Park (SSD 9726)

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ATTACHMENT A

EPA general considerations for SEARS for the adaptive reuse of the Royal Hall of Industries, 1 Driver Avenue Moore Park (SSD 9726)

Noise

The Environmental Impact Statement (EIS) should include a Noise Management Plan covering the construction and operational phases of the proposal. The NMP should be prepared in accordance with the EPA's *Noise Policy for Industry* (2017) and *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 EIS 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 EIS 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 EIS for the proposal should include 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 consulted when preparing the EIS. 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.