



DOC17503581-01  
SSD 7610

Mr Andrew Beattie  
Department of Planning and Environment  
GPO BOX 39  
SYDNEY NSW 2001

10 November 2017

Dear Mr Beattie

**SSD 7610 – INNER SYDNEY HIGH SCHOOL – RESPONSE TO SUBMISSIONS (RtS) REPORT**

I am writing to you in reply to your invitation to the NSW Environment Protection Authority (EPA) to comment on the RtS report (the Report) of the above project.

Demolition of Building 4

The EIS for the project indicated that demolition activities (and associated early works) would be undertaken pursuant to a separate development assessment process.

Nevertheless, the EPA's submission of 4 August 2017 concerning the project EIS highlighted its concerns that any demolition activities be undertaken in a manner consistent with the EPA's recommendations concerning subsequent stages of construction.

The EPA confirms its advice and recommendations subject to appropriate adjustment of the merged assessment process.

Hazardous materials – asbestos containing materials, lead-based paint and PCBs

Section 2.1 of Attachment A to the EPA's submission concerning the EIS recommended various actions to ensure the hazardous materials are adequately identified, managed and removed for proper disposal.

The EPA recommended amongst other things that –

- (a) a hazardous materials survey be undertaken, and
- (b) an unexpected (hazardous materials) finds protocol be prepared and implemented.

The EPA notes that Appendix E (letter of comfort from 'Greencap') to the Report –

- (a) refers to a January 2016 Hazardous Materials Risk Assessment Report, and
- (b) advises in reference to refurbishment and demolition works that “Prior to the commencement of such works a more intrusive pre-demolition hazardous material survey will be required ...”.

However, the EPA understands that the January 2016 *Hazardous Materials Risk Assessment Report* was not submitted in support of the project EIS.

The EPA confirms its advice and recommendations concerning management of potential hazardous materials including asbestos containing materials, lead-based paint and polychlorinated biphenyls (PCBs) that may be present on the development site.

#### Hours of work

The EIS proposes construction hours of 7.30 am to 3.30 pm on Saturdays.

Section 2.3 of Attachment A to the EPA’s submission concerning the EIS noted that the proposed Saturday work hours (for work audible at surrounding residences) is inconsistent with the recommended standard construction hours and that the EIS provided no justification for the proposed departure from standard hours.

Table 5 *Response to Agency Submissions* to the Report indicates proposed construction (and presumably demolition) hours as 7.00 am to 5.00 pm Saturdays “... requested to facilitate delivery of the project to meet the development timeframe ...”. However, the EPA does not consider productivity to be adequate justification for undertaking project works (audible or likely to be audible at noise sensitive land uses) outside the recommended standard hours of construction.

Accordingly, the EPA confirms that site preparation, demolition, stripping out, bulk earthworks, construction and construction-related activities (audible or likely to be audible at surrounding residences or other noise sensitive land uses) should only be undertaken during recommended standard construction hours.

The EPA further confirms its previous advice and recommendations in Section 2.3 of Attachment A to the EPA’s submission dated 4 August 2017.

#### Operational noise – fixed mechanical plant and equipment

Section 3.6 to EIS Appendix S *ESD Report* states that “natural ventilation is to be used where possible ...” and “[n]atural ventilation principles are to be incorporated into the architectural design where possible” whilst noting the need for limited mechanical ventilation for classrooms exposed to high traffic noise emissions.

However, section 5.8 to the Report indicates that the proponent now intends that all classrooms are to be “... fully air-conditioned ...”. The EPA thus anticipates increased operational noise impacts in the absence of feasible and reasonable noise mitigation and management measures matched to the modified mechanical ventilation plant and equipment.

The EPA confirms its previous advice and recommendations concerning mitigation and management of noise impacts associated with operation of fixed mechanical plant and equipment, especially mechanical ventilation plant and equipment.

Operational noise (other than from fixed mechanical plant and equipment)

Section 3.1 of Attachment A to the EPA's submission concerning the EIS provided detailed advice and recommendations concerning operational noise impacts associated with the operational phase of the development. The EPA notes that Table 5 *Response to Agency Submissions* to the RtS report indicates noise impacts from the school (including rooftop courts) have been assessed in accordance with City of Sydney Standard Conditions of Development Consent for 'Noise – General'. The EPA emphasises that –

- (a) the EPA is the appropriate regulatory authority for activities undertaken for and on behalf of the Department of Education at the development site, and
- (b) the Council is the appropriate regulatory authority for activities undertaken by external parties, including community organisations, at the school outside normal school hours (excepting where any such activities are undertaken for or on behalf of the Council).

The EPA confirms its previous advice and recommendations concerning mitigation and management of operational noise impacts other than those emitted by fixed mechanical plant and equipment.

Water sensitive urban design

Table 5 *Response to Agency Submissions* to the RtS report does not appear to address the advice and recommendation made by the EPA concerning practical opportunities for stormwater harvesting and re-use.

The EPA confirms its previous advice and recommendations concerning stormwater harvesting and re-use.

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

Yours sincerely



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