

DOC16/381181-01
SSD7387

NSW Planning and Environment
(Attention: Director - Social and Other Infrastructure Assessments)
GPO Box 39
SYDNEY NSW 2001

Dear Mr Gibson

CAMDEN MEDICAL CAMPUS PRECINCT, GLEDSWOOD HILLS (SSD 7387)

I am writing in response to your letter dated 1 August 2016 to the Environment Protection Authority (EPA) inviting comments on the above proposed State Significant Development (SSD).

The EPA has reviewed the submitted information and provides its comments in the attachment to this letter (**Attachment A**) for the Department of Planning and Environment's (DPE) consideration in its assessment of the proposed development. These relate to the following key matters:

- Statutory Considerations
- Air Quality
- Noise and Vibration
- Water Quality
- Waste

If you have questions regarding the above, please phone Chris Kelly on (02) 4224 4100.

Yours sincerely

A handwritten signature in black ink, appearing to be 'P. Bloem'.

29/08/16

PETER BLOEM
Manager Illawarra
Environment Protection Authority

Contact officer: CHRIS KELLY
42244100

1. Statutory Considerations

In general the proponent should ensure that the proposed development complies with the requirements of the *Protection of the Environment Operations (POEO) Act 1997* and its associated regulations. This includes but is not necessarily limited to the following:

- Prevent pollution of waters
- Prevent land pollution
- Ensure activities are not carried out in an environmentally unsatisfactory manner. “*Environmentally unsatisfactory manner*” is defined in Section 95 of POEO Act
- Duty to notify pollution incidents.

The proponent should determine if an Environment Protection Licence (EPL) under the POEO Act is required. For example, sterilisation activities require an EPL if it involves the use of more than one tonne of ethylene oxide per year. Sterilisation activities means the sterilisation of products or equipment by means that include the use of ethylene oxide.

If the occupier of the premises is a public authority, the EPA will be the appropriate regulatory authority for the proposed development under the POEO Act. If the occupier of the premises is not a public authority, Camden Council will be the ARA under the POEO Act.

The EPA administers the *Radiation Control Act*, registration and associated legal instruments. The Act and Regulation apply to the use and possession of radiation apparatus and radioactive substances. Should consent be granted for the proposed development, radiation apparatus installed at the premises must be registered with the EPA upon completion of the facility. All operators of the apparatus must also be licensed. During the registration process the radiation apparatus must be tested and certified by an EPA accredited radiation expert. The apparatus must meet the requirements of the publication, *Radiation Guideline 6*. This publication is available at the following web site:

<http://www.epa.nsw.gov.au/radiation/CREinfo.htm>.

2. Air Quality

The excavation and construction stages of the proposal have the potential to generate dust emissions. The EPA recommends the following requirements be secured as consent conditions if approved:

- *Activities occurring in or on the premises must be carried out in a manner that will prevent or minimise the generation or emission from the premises of dust including wind-blown or traffic generated dust.*
- *The proponent must also ensure that the proposed development does not cause or permit the emission of offensive odour beyond the boundary of the premises.*

A Construction Environmental Management Plan (CEMP) should be developed which clearly documents measures to demonstrate how the above requirements will be achieved at the site during the construction phase.

3. Noise and Vibration

A Construction Noise and Vibration Management Plan (CNVMP) should be developed prior to commencement of construction to ensure that noise and vibration criteria are complied with. This should be included as part of the CEMP.

The EPA recommends that construction activities associated with the proposal should be carried out in accordance with the *Interim Construction Noise Guideline* (ICNG) (DECC 2009). The CNVMP should include appropriate management strategies, monitoring programs and mitigation measures to ensure that noise generated from the proposed new works is minimised as far as practicable and achieves the project specific noise criteria as identified in the ICNG.

4. Water Quality

All activities undertaken at the site during both the construction and operational phases should ensure:

- there is no pollution of waters (including surface and groundwater)
- promotes integrated water cycle management that optimises opportunities for sustainable water supply, wastewater and stormwater management and reuse initiatives where it is safe and practicable to do so
- bunding is designed in accordance with the EPA's *Bunding and Spill Management Guidelines*.

The CEMP should clearly document measures to demonstrate how the above requirements will be achieved at the site. This plan should also include a Soil and Water Management Plan developed and implemented prior to construction in accordance with the *Managing Urban Stormwater: Soils and Construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; B Waste landfills; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC 2008).

There appears to be limited information provided regarding connection of the proposed development to the existing Sydney Water sewerage system. The proponent should ensure this connection can cater for any new loads, in discussion with Sydney Water. This includes the management of sewage overflows from any existing sewage pumping stations and discharges from any associated sewage treatment plant. EPA's policy is 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 avoided.

5. Waste

The EPA recommends that the following requirements be secured as consent conditions if approved:

- Any waste generated during demolition and construction should be classified in accordance with the EPA's *Waste Classification Guidelines* and managed in accordance with that classification
- Waste stored or removed on site must comply with EPA legislation and guidelines
- Any waste being removed from the site can only be transported to a site that can lawfully receive that type of waste. The EPA legislation and guidelines should be consulted in relation to this.

DPE should consult the *Waste Not Development Control Plan (DCP) Guideline* (EPA 2008) when assessing and determining this proposal. 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.

A key component of this guideline includes the requirement of developers to submit a plan showing estimates of waste generation during demolition, construction and ongoing use of the site, as well as details on how these wastes will be sorted, stored and removed for recycling and/or disposal. A copy of the guideline can be obtained at the following site:

(<http://www.epa.nsw.gov.au/resources/warr/08353SiteWasteMin2.pdf>).

In addition, the EPA also recommends the proponent should consult the following guidelines to assist the development of waste management strategies:

- The *Better Practice for Public Place Recycling* (DEC 2005) provides information on standards for recycling systems in public places, such as parks, shopping centres, footpaths, bus-stops, etc. This guideline can be accessed at: <http://www.epa.nsw.gov.au/warr/publicrecycling.htm>.
- The *Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities* (EPA, December 2012). This guide can be accessed at: <http://www.epa.nsw.gov.au/warr/BPGuideCIFacilities.htm>.

