

1 September 2016

Peter McManus
Planning Officer
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr McManus

Hunter Sports High School Redevelopment SSD 16_7532

I refer to the Environmental Impact Statement (EIS) exhibited on the NSW Department of Planning & Infrastructure web site in relation to the Hunter Sports High School Redevelopment (SSD 16_7532).

The redevelopment includes the demolition of a number of the school buildings and construction of new facilities and the remediation of some contaminated sites within school grounds. The construction is staged over two years and is intended to take place both within and outside of school hours.

Hunter New England Health (HNE Health) has reviewed the Environmental Impact Statement report paying particular attention to the management of air quality, noise, soil, water and other issues that may have an impact on public health. The following points are discussed and should be considered in the approval process for this project.

Air Quality

The EIS indicates Air Quality as an issue during the construction process. The Report on Targeted Site Investigation for Contamination prepared by Douglas Partners in relation to the Hunter Sports High School Redevelopment identified fibro fragments containing asbestos in surface and upper filling in areas on the site. The report recommended remediation as an immediate interim measure. The EIS states a hazardous materials report will be compiled of the current buildings prior to demolition. Given the age of the buildings it is likely that asbestos containing material is present. All demolition works should give consideration to the findings of this report.

The EIS states that during remediation if any identified areas of contamination are disturbed then monitoring by an occupational hygienist should take place, this action is supported. Further, air quality monitoring for the presence of respirable asbestos fibres should take place prior to any activity to assess (background) levels; during demolition, construction and remediation works (exposure and control); following the works (clearance) and action taken on elevated findings.

Airborne particulate matter is identified as being a key air quality issue. The detrimental health effects of particulate matter are well established. Any increase in exposure is associated with some increase in health

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risk. HNE Health notes that the proposed project would cause an increase in particulate matter concentration at a number of sensitive receptors. The school will be operating during much of the redevelopment and thus sensitive receptors will be close by.

To minimise any potential health impacts it is recommended that, should the project be approved, the proponent be required to do all that is reasonable and feasible to minimise particulate matter emissions. The environmental management/ dust mitigation measures identified in the Air Quality Section of the EIS should be instigated to minimise health effects on the school populations, surrounding residences and other occupied spaces. HNE Health notes that the Construction Environmental Management Plan (CEMP) will include management measures regarding air monitoring.

Noise

Environmental noise can have negative impacts on human health and well-being and trigger ongoing community complaints about annoyance, sleep disturbance and stress. Evidence concerning the adverse health effects of environmental noise is detailed in a number of publications, for example, the World Health Organization *Night Noise Guidelines for Europe* (2009) and the WHO *Guidelines for Community Noise* (1999).

Receivers in the locality surrounding the redevelopment site are educational, residential and commercial.

The EIS indicates that to minimise noise impacts on individuals in Hunter Sports High School and the neighbouring school some work will be performed out of normal construction hours. The works should be scheduled during the Period of Out of Hours Construction 1, since excessive noise is likely to have greater detrimental health impacts if it occurs overnight (Out of Hours Construction Period 2).

Compliance noise monitoring should occur at the localities identified in the EIS to indicate exceedances. Noise mitigation measures as stated in the EIS should be implemented. Consultation with the community is important.

Rainwater Tanks

The hydraulic design for the redevelopment includes a rain water re-use system supplying non-potable water to the main amenity areas for toilet flushing and to new hose taps and irrigation systems for landscaped areas. To protect health of the public and ensure non potable water is not consumed by individuals, 'Do Not Drink' signage should be placed at all taps. These signs are available from the NSW Health website in the box headed *Example Signs* at the following link:

<http://www.health.nsw.gov.au/environment/water/Pages/private-supplies.aspx>

Surface Water

Operators should ensure there is minimal impact from the proposed development on the water quality of surrounding natural waterways, particularly from stormwater runoff. All disturbed areas of contamination and stockpiles of earth should be contained so as to limit runoff. Erosion and sediment control measures are to be implemented.

Ground Water

NSW Health notes that free groundwater was identified at depths of 1.2 and 2.9 metres respectively. The EIS states that a ground water management plan to prevent groundwater contamination will be part of the CEMP.

Soil

Remediation of land intended for future development is required due to contamination from past land uses, this issue is considered in the EIS. Additionally the EIS states that a hazardous materials report will be compiled of the current buildings prior to demolition. The site has been contaminated by previous activities including presence of lead localised at one location, localised hydrocarbon in one location, benzo(a)pyrene

and presence of building rubble including asbestos containing material in near surface filling and at the surface in several areas of the site.

On site management of contaminated soils is recommended as the preferred option. Remediation goals were established with the main objective to place contaminated soils beneath a suitable capping layer of concrete slab / pavement (one designated building footprint) to prevent exposure and accessibility. Any excess material requiring offsite disposal should be classified with reference to NSW EPA Waste Classification Guidelines (2014) and disposed to a licensed facility. A separation/ marking layer should be placed on top of contaminated fill materials prior to overlying materials. Upon the completion of capping, a suitably qualified environmental consultant should prepare a Remediation and Validation report to be finalised following the completion of construction. These actions should be followed to minimise health risk.

Assessment of school playing fields for contaminated fill should also be conducted as part of the long term site management as recommended in the report by Douglas Partners.

Community Consultation

It is recommended if not already conducted, that the proponent seeks additional specialist advice in relation to ensuring genuine community engagement and consultation processes.

If you require any further information please feel free to contact Allison Garrett, Environmental Health Officer on (02) 49246476

Yours sincerely



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