



DOC17/559015-15:CP

Mr David Gibson
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Gibson

Arts and Social Sciences Building, University of Wollongong (SSD 8596)

I am writing in response to the Department of Planning and Environment (DPE) letter dated 13 November 2017 inviting comment from the Environment Protection Authority (EPA) on the above development application.

Based on a review of the information in the Environmental Impact Statement (EIS), the proposed project does not appear to require an Environment Protection Licence under the *Protection of the Environment Operations Act 1997* (POEO Act). All activities must comply with the POEO Act and associated Regulations should development consent be granted.

The EIS indicates that a number of detailed management plans will be developed once the principal contractor has been engaged. These include but may not be limited to:

- a) Detailed Construction Management Plan
- b) Waste Management Plan
- c) Construction Traffic Management Plan
- d) Construction Noise and Vibration Assessment and Management Plan

The EPA provides comments in the Attachment to this letter (**Attachment A**) to assist DPE in assessing the development application and the preparation of these management plans.

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

Yours sincerely

A handwritten signature in blue ink, appearing to be 'P. Bloem', written over a circular stamp.

22/11/17

PETER BLOEM
Manager Regional Operations Illawarra
Environment Protection Authority

Contact officer: CRAIG PATTERSON
(02) 4224 4100

Attachment

Attachment A

1. The EPA has identified the following minor issues that should be clarified as part of DPE's assessment of the application:
 - a) Section 1.1 of the EIS indicates that the proposed development includes the demolition of two existing demountable buildings and relocation of five demountables. Section 2.2 indicates that the site comprises eight aged demountable buildings.
 - b) Section 2.6 states that the development site contains 223 trees. Section 3.8 states that the site current accommodates 232 trees of which 113 will be removed.
2. Section 3.14 of the EIS states that the construction hours are 7:00am to 5:30pm Monday to Friday, 7:30am to 3:30pm Saturdays and at no time on Sundays and Public Holidays. Section 3.3 of the Preliminary Construction Management Plan (CMP) dated September 2017 shows that the hours will be 7:00am to 5:00pm Monday to Saturday. The hours of construction should be consistent with the EPA's Interim Construction Noise Guideline which recommends 7:00am to 6:00pm Monday to Friday, 8:00am to 1:00pm Saturdays and at no time on Sundays or public holidays. This information should be reflected in the detailed CMP which will be prepared by the principal contractor upon appointment.
3. Section 5.11.3 indicates that groundwater will be encountered during the drilling of bored piles. The EIS does not include any information on how groundwater will be managed at the site as part of the proposed development. Further information should be provided to demonstrate that the project will not result in pollution of waters as defined in Section 120 of the POEO Act.
4. Section 5.16 details the Acoustic Impacts based on the noise assessment provided in the Acoustic Report prepared by Arup dated 27 October 2017. The following issues have been identified which require further information and/or clarification:
 - a) The noise assessment states that the nearest noise-sensitive receivers for the project are the Kooloobong Village (student accommodation) and the University of Wollongong Early Start Facility. These receivers are located within the university premises. Based on the spatial services provided SIX Maps (NSW Department of Finance and Services) the residences along Dallas Street to the north of the carpark appear to be closer than the Kooloobong Village. Based on the acoustic assessment provided, the impacts on the nearest residential receivers to the north have not been assessed.
 - b) Table 9 in the Noise Assessment Report uses the recommended maximum amenity criteria instead of the recommended acceptable criteria to derive the project operational noise criteria.
 - c) The acoustic assessment indicates that operational noise associated with mechanical plant such as the rooftop plant will need to be attenuated, where necessary, in order to meet the project noise criteria at the surrounding sensitive receivers. The assessment identifies however that the mechanic plant equipment has yet to be selected.
 - d) A preliminary quantitative construction noise assessment has been undertaken as the details of the construction processes and equipment that will be required have not been determined at the time of the assessment. The acoustic assessment states that a more detailed review will be conducted by the contractor as part of the construction planning process. This information should be provided to clearly demonstrate that the selected construction processes and equipment comply with the specific project noise criteria.
 - e) For both the Early Start Facility and the Kooloobong Village, the predicted external construction noise levels provided in Table 11 of the Noise Assessment Report are significantly above the noise affected and highly noise affected management levels identified by the ICNG (Table 2). The predicted internal construction noise levels are also significantly above the management level identified by the ICNG (Table 3). No assessment against the management levels has been provided.

The report states that the selected contractor will provide a detailed Construction Noise and Vibration Assessment and Management Plan which will include processes for managing noise impacts to the nearby buildings to ensure that the internal noise levels meet the requirements of the ICNG. The external noise levels at the nearest residential receivers will also need to be

managed. The management plan should include all reasonable and feasible measures to ensure both external and internal noise levels meet the requirements of the ICNG.

Note: The NSW Industrial Noise Policy (2000) was replaced by the Noise Policy for Industry (2017) in October 2017.

5. Table LR1 in the Contamination Assessment Report prepared by Coffey Services Australia Pty Ltd dated 27 September 2017 does not appear to include the sample results for borehole location CBH05. The results are also not included with the laboratory reports provided in Appendix J of the report. Additional information should be provided to either include the results for this borehole or to clarify why the results have not been provided.

