

EF16/2911, DOC 17/95221-01  
SSD 7534 MOD1

Mr Peter McManus  
Department of Planning and Environment  
GPO BOX 39  
SYDNEY NSW 2001

Dear Mr McManus

**SSD 7534 MOD1 – WESTERN SYDNEY STADIUM STAGE 1 (DEMOLITION)**

I am writing to you in reply to your invitation to the EPA to provide a submission in respect of the application to modify the consent for stage 1 of the project.

The EPA requests that these comments are read in conjunction with its letters dated 22 August 2016, 11 October 2016 and 12 January 2017 concerning the project.

The EPA emphasises that it does not review or endorse environmental management plans or the like and therefore has not reviewed any environmental management plan forming part of or referred to in the application.

1. Noise impacts

The EPA understands that the proposed modification would (if approved) involve the installation of piles by means of pile driving or hammering. The EPA notes:

- (a) the proximity of various noise sensitive land uses including residences, schools, a child care facility, and a place of public worship;
- (b) the intrusiveness of noise emitted by pile driving or hammering activities;
- (c) the availability of quieter, less intrusive pile installation methods;
- (d) that the modification application was not supported by a noise impact assessment; and
- (e) that the modification application was accompanied by a noise and vibration management plan (Attachment I) which should have been prepared having regard to a noise impact assessment for all the activities encompassed by the original stage 1 and the proposed modification.

## Recommendation

The proponent be required to –

- prepare a noise and vibration impact assessment for the modified stage 1 of the project;
- identify and adopt alternative less noisy piling methods (example: vibro-piling in those areas where pile boring represents an unacceptable safety risk) other than driven piling, and
- adopt intra-day respite periods in close consultation with nearby schools, residences and places of public worship.

The EPA notes that the frequency and duration of intra-day respite periods should be determined based on the duration and types of construction (and demolition) activities being undertaken. The Interim Construction Noise Guideline identifies a range of activities as being particularly annoying to surrounding noise sensitive receivers, especially residences.

### 3. Site contamination

The EPA understands that a site auditor accredited under the *Contaminated Land Management Act 1997* has been engaged for the project. The Remedial Action Plan for the site proposes that contaminated fill material will be excavated and re-buried on site under a 'capping layer', comprising a marker layer and a minimum of 0.5 metres of clean material.

## Recommendation

The proponent be required to ensure all services and service trenches lie above the proposed marker layer to minimise any risks to workers undertaking future repair and maintenance of those services.

## Recommendation

The proponent be required to ensure all clean material to be used for the capping layer comprises virgin excavated natural material.

## Recommendation

The proponent be required to undertake a hazardous materials audit of existing structures prior to demolition and to remove all hazardous materials at the direction of an appropriately qualified occupational hygienist.

## Recommendation

The proponent be required prior to commencing work to prepare and implement an appropriate procedure for identifying and dealing with unexpected finds of site contamination.

## Recommendation

The proponent be required to satisfy the requirements of the *Protection of the Environment Operations (Waste) Regulation 2014* with particular reference to Part 7 'asbestos wastes'.

Please note additional guidance material is provided at:  
<http://www.environment.nsw.gov.au/waste/asbestos/index.htm>.

## Recommendation

The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the course of the project.

## Recommendation

The proponent be required to implement site auditor recommendations, including:

- (a) submission of a works plan and a validation, sampling and analysis plan to the site auditor to identify how gaps in the assessment of fill materials will be undertaken (noting that asbestos is identified as the main Chemical of Potential Concern);
- (b) implementation of the site sampling plan after formal confirmation by the site auditor that the content of the sampling plan is considered appropriate;
- (c) preparation and implementation of a long term plan –
  - (i) for identifying the location of re-buried asbestos impacted material, and
  - (ii) detailing the requirements for ongoing management of re-buried asbestos impacted material on the development site; and
- (d) preparation of an asbestos works management plan (incorporating detailed requirements for dust and water control and management) as well as implementation of that plan upon confirmation from the auditor that the asbestos works management plan is considered to be appropriate.

## Recommendation

The proponent be required to ensure management plans for the construction works and waste management are reviewed by the site auditor.

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

Yours sincerely



21/2/2017

**JACINTA HANEMANN**  
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**NSW Environment Protection Authority**

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