



Our reference: EF13/3893, DOC16/170030-02  
Contact: John Goodwin

Mr Alexander Scott  
Department of Planning and Environment  
GPO BOX 39  
SYDNEY 2001

Dear Mr Scott

**SSD 7419 – TARONGA AUSTRALIA HABITAT AND WILDLIFE RETREAT DRAFT EIS**

I am writing to you in reply to your invitation to the EPA to comment on the EIS for the above project.

The EPA notes that the proposed development includes –

- (a) demolition of some existing structures,
- (b) provision for overnight tourist accommodation, and
- (c) increased capacity and use of Taronga function centre.

The EPA requests that these comments be read in conjunction with the advice in our letter dated 15 December 2015. And, remains concerned about operational noise impacts on surrounding residents.

The EPA emphasises that it does not review or endorse environmental management plans or the like for reasons of maintaining regulatory 'arms length'. And, has not reviewed the environmental management plans forming part of or referred to in the EIS.

1. Site contamination

Section 9 of EIS Appendix V 'Report on Preliminary Site Investigation (Contamination)' indicates that site "... either is suitable or could be made suitable for the proposed development."

**Recommendation**

The proponent be required to implement an Unexpected Finds Protocol for the managing, transport and disposal of any asbestos encountered during the project.

## 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'.

## Recommendation

The proponent should be required to consult with SafeWork NSW concerning the handling of any asbestos waste.

### 2. Operational noise impacts

The EPA remains concerned about risks of unacceptable noise impact which may arise from inadequate noise impact assessment, management and mitigation measures.

The EPA anticipates that operation of the proposed facilities may change the nature and intensity of noise impacts on surrounding residences. The *NSW Industrial Noise Policy, January 2000* (INP) provides guidance material on noise impact assessment.

The EPA considers that the proponent should provide predicted worst case noise impacts on surrounding residences as required by the SEARs.

The EPA notes that EIS Appendix L does not establish the background noise level at noise sensitive receivers (i.e. residences), especially those located to the north and northeast of the project site.

Appendix L does not provide the quantitative operational noise impact assessment required by the SEARs. Instead, Appendix L section 3.1 appears to suggest that –

- (a) noise impact on surrounding residents is unlikely to be a matter of concern, and
- (b) the focus of noise impact assessment should be on the amenity of guests accommodated on site.

Appendix L section 3.1 proposes that "... the primary sources of noise will be restaurant/lounge activities and any mechanical plant and equipment serving the development." However, The EPA understands that –

- (a) the development will include a dining/function room on the top level (i.e. level 2) with an associated outdoor terrace. (Appendix L indicates that the bar and restaurant are proposed to be operate from 6.00 am to 1.00 am 7 days per week but omits the operating times for the function facilities on level 2),
- (b) EIS section 6.4.1 indicates that parking to serve guest accommodation will be provided in the existing Whiting Beach Road multi-storey carpark immediately opposite residences on the northern side of that road.

The EPA is aware that certain outdoor entertainment activities at the Zoo have been the subject of noise complaints. However, Appendix L does not provide an assessment of typical noise impacts (including sleep disturbance impacts) arising from amplified music and predictable behaviour of function centre and terrace, bar and restaurant patrons.

Appendix L section 4 assesses road traffic noise impacts but does not assess noise impacts associated with evening and 'night-time' (10.00pm to 7.00 am) use of the existing multi-storey carpark. However, the EPA is unclear where parking for patrons and staff of the

function centre, bar and restaurant will be provided and thus is unable to comment on any likely noise impacts associated with that activity.

Section of 3.2.2 of Appendix L proposes that noise impact assessment of mechanical plant (likely to include roof top ventilation plant and lift motors) be deferred until the detail design stage of the development.

### **Recommendation**

The proponent should (before any consent) is issued identify the background noise level for the locality measured at the most affected noise sensitive receivers (including residences north and northeast of the site) in accordance with guidance material in Chapter 3 of the NSW Industrial Noise Policy

### **Recommendation**

The proponent should undertake a comprehensive quantitative assessment of noise impacts associated with operation of the new facilities (including evening and night-time car park use) together with design for feasible and reasonable noise impact avoidance and mitigation, including but not limited to:


- (a) potential sleep disturbance impacts on surrounding residents; and
- (b) whether or not there is a need to apply 'modifying factors' (see INP chapter 4) to noise monitoring data and associated noise impact assessment.

The proponent should commit to averting unacceptable noise impacts on surrounding noise sensitive receivers by –

- preparing a detailed operational noise impact statement that incorporates feasible and reasonable measures to avoid, minimise and manage noise and incorporating those noise avoidance and minimisation measures at the design stage of the project,
- establishing and fostering a good relationship with surrounding residents (including facilitation of the logging noise complaints and of obtaining an active and timely response to those complaints);
- undertaking a noise monitoring program to 'ground truth' noise impact predictions at set periods following commencement of operation of the new facilities;
- restricting loading dock and waste collection activities to 'day-time' as defined in the NSW Industrial Noise Policy, January 2000;
- undertaking a noise monitoring program at various periods after commencement of operation of the each project element to verify that measured noise levels do not exceed levels predicted in the required noise impact statement and acceptable noise levels identified in the NSW Industrial Noise Policy, January 2000.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Sharpin', written over the printed name.

23.5.16

**MIKE SHARPIN**

**Acting Manager Metropolitan Infrastructure  
Environment Protection Authority**