

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

Dear Mr Hay

**SSD 9391 – KYEEMAGH PUBLIC SCHOOL RE-DEVELOPMENT – ENVIRONMENTAL IMPACT STATEMENT (EIS)**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to make a submission concerning the above project EIS.

The EPA requests that this submission be read in conjunction with its letter dated 21 June 2018 in respect of the draft Secretary's environmental assessment requirements for the project.

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

The EPA understands that the development site encompasses the existing school and the North Brighton Pre-School, which is understood to be leased by the local Council, sub-let to a private operator and fenced off from the existing school. EIS section 4.1 states "... the North Brighton Preschool buildings, fronting Tancred Avenue, are not affected by the development." Accordingly, the EPA considers that, given the pre-school is not under the control and management of the proponent, the occupants of the pre-school are persons effectively not on the school premises whose comfort or repose may be interfered with by noise emissions from construction and operation of the re-developed school.

EIS Section 4.1 indicates that development includes demolition of the existing school buildings and site preparation and construction of the new school in three stages, including a school hall near the corner of Jacobson Avenue and Beehag Street.

The EPA has identified the following site specific concerns based on the project information available on the Department of Planning and Environment major projects web site:

- (a) the need for a detailed assessment of potential site contamination, including information about groundwater and a detailed assessment of the footprint and surrounds of existing buildings following their demolition;

- (b) the need to identify, manage and dispose of acid sulfate soils and potential acid sulfate soils encountered during site preparation and bulk earthworks;
- (c) construction phase noise and vibration impacts (including recommended standard construction hours and intra-day respite periods for highly intrusive noise generating work) on noise sensitive receivers such as surrounding residences;
- (d) construction phase dust control and management,
- (e) construction phase erosion and sediment control and management;
- (f) operational noise impacts on noise sensitive receivers (especially surrounding residences on adjoining and nearby holdings) arising from operational activities such as public address/school bell systems, community use of school facilities, waste collection services and mechanical services (especially air conditioning plant);
- (g) the need to assess feasible and reasonable noise mitigation and management measures (including time restrictions on the use of the facilities proposed to be available for community use) to minimise operational noise impacts on surrounding residences and the adjoining pre-school;
- (h) practical opportunities to implement water sensitive urban design principles, including stormwater re-use; and
- (i) practical opportunities to minimise consumption of energy generated from non-renewable sources and to implement effective energy efficiency measures.

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

Yours sincerely



**SARAH THOMSON**  
**Unit Head, Metropolitan Infrastructure**  
**NSW Environment Protection Authority**

**Attachment A**

Contact officer: JOHN GOODWIN

## ATTACHMENT A

### - ENVIRONMENT PROTECTION AUTHORITY COMMENTS -

#### SSD 9391 KYEEMAGH PUBLIC SCHOOL RE-DEVELOPMENT

#### 1. General

The EPA considers that the project comprises distinct phases of construction and operation and has set out its comments on that basis. The EPA notes the proximity of surrounding residences which may be adversely affected by noise impacts during demolition, site preparation, construction and operation phases of the project.

#### 2. Construction phase

The EPA anticipates that site establishment, demolition, bulk earthworks, construction and construction-related activities will be undertaken in an environmentally responsible manner with emphasis on:

- the site contamination remediation action plan accompanying the EIS,
- compliance with recommended standard construction hours,
- intra-day respite periods from high noise generating construction activities (including jack hammering, rock breaking, pile boring or driving, saw cutting),
- feasible and reasonable noise and vibration minimisation and mitigation,
- effective dust control and management,
- erosion and sediment control, and
- waste handling and management, particularly concrete waste and rinse water.

##### 2.1 Site contamination (incl. asbestos containing material)

The EPA anticipates that given the age of some of the structures on the development site, asbestos containing materials and lead-based paints are likely to be encountered during demolition. EIS Appendix F reports on a hazardous building materials survey which confirms the presence of asbestos cement sheeting in buildings identified for demolition.

Section 8.2.1 to EIS Appendix H states asbestos containing material "... in the form of fibre cement debris was identified at the soil surface in locations, beneath the turf at TP03, and within shallow fill material at TP04."

Section 8.3 to EIS Appendix H notes that the site is a functioning school and as such "... , investigation was not able to be undertaken within the building footprint of structures." Section 8.3 further states that –

- (a) "[g]iven the presence of fill on site, there is likely to be some variability in the quality and type of fill.", and
- (b) "... there is potential for ACM to be present on other areas".

The EPA anticipates that demolition of the existing school is likely to generate asbestos waste. Since late 2015, clause 79 of the Waste Regulation has required transporters of loads of asbestos waste to provide certain details of the loads to the EPA using the "WasteLocate" system. These details include details of the source site, date of proposed transport, details of the proposed destination site and the

approximate weight of asbestos waste in the load. The information must be provided to the EPA before transportation of the load commences.

WasteLocate is an online tool that allows the EPA to track the transport of asbestos waste. Transporters are required to use WasteLocate to report the movement of more than 100 kilograms of asbestos waste or more than 10 square metres of asbestos sheeting within NSW. The details can be reported on WasteLocate by using an app on a mobile phone or tablet or by using a computer.

EIS Appendix AA *Remediation Action Plan* provides for two potential remediation options. Remediation Strategy 1 would involve the complete removal of all contaminated materials from the site, whereas Remediation Strategy 2 would involve the capping asbestos within the site. The EIS suggests that the preferred remediation pathway would be determined once the works are due to commence.

Section 9.6 to EIS Appendix AA incorporates a generic rather than a project specific unexpected finds procedure.

The EPA emphasises that both the Remediation Action Plan and the unexpected finds procedure need to be updated in the context of the results of the post-demolition investigation of soil and groundwater contamination.

## Recommendations

1. The proponent be required to ensure that all excavated material is assessed, classified and managed in accordance with the "*Waste Classification Guidelines Part 1: Classifying Waste*" (Department of Environment Climate Change and Water, December 2009);
2. 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'.

**Note:** The EPA provides additional guidance material at its web-site

<http://www.environment.nsw.gov.au/waste/asbestos/index.htm>.

3. 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.
4. The proponent be required to ensure that following relocation or demolition of any existing structures, parking infrastructure and in ground utilities further investigation be undertaken of soil and groundwater contamination within and in the immediate vicinity of the footprint of those structures, infrastructure and utilities prior to undertaking any construction, including site preparation and bulk excavation.
5. The proponent be required to ensure that prior to commencing any work on the development site, an appropriate procedure:
  - (a) is prepared and implemented to identify and deal with unexpected finds of site contamination, including asbestos containing materials, and lead-based paint; and
  - (b) details who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved.
6. The proponent be required consider the guidance material provided in *The National Environment Protection (assessment of contamination) Measures, 2013* as amended as well as the following EPA documents when undertaking further site assessment and validation -
  - Technical Note: Investigation of Service Station Sites, 2014,

- NSW EPA Sampling Design Guidelines,
  - Guidelines for the NSW Site Auditor Scheme (3<sup>rd</sup> edition) 2017, and
  - Guidelines for Consultants Reporting on Contaminated Sites, 2011.
7. The proponent be required to ensure that the processes outlined in *State Environmental Planning Policy 55 - Remediation of Land (SEPP55)* are followed in assessing the suitability of the land and any remediation required in relation to the proposed use.
  8. The proponent be required to ensure that the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination.
  9. The proponent be required to notify the EPA should any contamination of the development site be identified which meets the triggers in the *Guidelines for the Duty to Report Contamination*.
  10. The proponent be required, should additional site investigations reveal further contamination of soil or groundwater, to engage a site auditor (accredited under the Contaminated Land Management Act) to:
    - (a) review the adequacy of contamination assessment reports, any remediation action plan and unexpected finds procedure, and
    - (b) provide a Section A Site Audit Statement (SAS) and accompanying Site Audit Report (SAR) certifying the suitability of the development site for the proposed use.

#### 2.1.1 Acid sulfate soils

The EIS confirms the presence of acid sulfate soils on the development site. The EPA anticipates the likelihood that during demolition, bulk earthworks and construction, acid sulfate soils or potential acid sulfate soils may be disturbed. The EPA emphasises that potential acidification of the soil profile once the soils are disturbed during the redevelopment may increase the mobility of any heavy metal contaminants in the site soils.

The EPA confirms that acid sulfate soils may only be disposed of at a waste facility legally able to receive such waste. Any waste containing acid sulfate soils must be classified in accordance the EPA's waste classification guidelines Part 4. The EPA's waste classification guidelines are available at its web site via the following link –

<http://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/waste-classification-guidelines>

### **Recommendations**

1. The proponent be required to assess and manage any acid sulfate soil (ASS) and potential acid sulfate soil (PASS) in accordance with the 1998 *Acid Sulfate Soils Manual* published by the NSW Acid Sulfate Soil Management Advisory Committee (ASSMAC).
2. The proponent be required to ensure all acid sulfate soil waste generated during the project is kept separate from all other waste and is assessed, classified and managed in accordance with the *“Waste Classification Guidelines Part 4: Acid Sulfate Soils”*.

#### 2.1.2 Odour management

The EPA notes that sulfurous odours may arise during disturbance, stockpiling and transport of any acid sulfate soil (ASS) and potential acid sulfate soil (PASS). The EPA anticipates that odour prevention and management measures would include amongst other things:

- (a) covering and protection of all stockpiles and truckloads of acid sulfate soil (ASS) and potential acid sulfate soil (PASS) to prevent exposure to precipitation and runoff,
- (b) odour suppressants being applied during site preparation and bulk excavation works, and
- (c) limiting the surface area of exposed odorous material.

## Recommendations

1. The proponent be required to ensure that all such measures as may be necessary to minimise and manage any odours arising from excavation, stockpiling and removal of contaminated and acid sulfate soil are implemented, including but not limited to:
  - (a) staged excavation to limit the surface area of exposed odorous material,
  - (b) application of odour suppressants,
  - (c) effective covering of stockpiles and truckloads of excavation spoil, and
  - (d) expedited removal of odorous material from the development site to a facility legally able to accept those wastes.
2. The proponent be required to ensure that any Air Quality and Odour Management Plan prepared for the project includes amongst other things:
  - Proactive and reactive management strategies;
  - Key Performance indicator(s);
  - Monitoring method(s);
  - Location, frequency and duration of monitoring;
  - Record keeping;
  - Response mechanisms;
  - Contingency measures; and
  - Compliance report.

## 2.2 Noise and vibration

The EPA anticipates that demolition, site preparation (including tree clearing), bulk earthworks, construction and construction-related activities are likely to have significant noise and vibration impacts on surrounding residences (especially adjoining residences) and on the North Brighton Pre-School.

The proponent should consider bringing forward the installation of any proposed noise barriers to minimise noise impacts on adjoining noise sensitive receivers during the demolition and construction phases of the project.

### 2.2.1 *general construction hours*

The EPA emphasises that demolition, site preparation, bulk earthworks, construction and construction-related activities should be undertaken during the recommended standard construction hours.

Section 7.1 to EIS Appendix EE references "... Bayside Council standard daytime working hours ..." even though the project SEARs item 11 *Noise and Vibration* explicitly references the Interim Construction Noise Guideline (ICNG).

The EPA emphasises that the proponent is a 'public authority' within the meaning of the Protection of the Environment Administration Act 1991. The EPA has general responsibility under that Act for amongst other things:

- (a) ensuring that the best practicable measures are taken for environment protection in accordance with the environment protection legislation and other legislation, and
- (b) coordinating the activities of all public authorities in respect of those measures.

Table 1 to the EPA's ICNG clearly identifies the best practicable measures in respect of the recommended standard hours of construction (in the absence of strong justification for alternative hours). Section 7.1 to EIS Appendix EE proposes construction hours that are inconsistent with these recommended standard hours, particularly regarding proposed extended work hours during Saturday mornings and afternoons. The proponent provides no justification for undertaking demolition and construction works outside the ICNG recommended standard hours.

### **Recommendation**

The proponent be required to ensure that as far as practicable all demolition, site preparation, bulk earthworks, construction and construction-related activities likely to be audible at any noise sensitive receivers such as surrounding residences are only undertaken during the standard construction hours, being -

- (a) 7.00 am to 6.00 pm Monday to Friday,
- (b) 8.00 am to 1.00 pm Saturday, and
- (c) no work on Sundays or gazetted public holidays.

#### **2.2.2 *intra-day respite periods***

The EPA anticipates that those demolition, site preparation, bulk earthworks, construction and construction-related activities generating noise with particularly annoying or intrusive characteristics (such as those identified as particularly annoying in section 4.5 of the ICNG) would be subject to a regime of intra-day respite periods where –

- (a) they are only undertaken after 8.00 am,
- (b) they are only undertaken over continuous periods not exceeding 3 hours with at least a 1 hour respite every three hours, and
- (c) 'continuous' means any period during which there is less than an uninterrupted 60 minute respite between temporarily halting and recommencing any of the intrusive and annoying work referred to in section 4.5 of the ICNG.

The EPA emphasises that intra-day respite periods are not proposed to apply to those demolition, site preparation, bulk earthworks, construction and construction-related activities that do not generate noise with particularly annoying or intrusive characteristics.

### **Recommendation**

The proponent be required to schedule intra-day 'respite periods' for construction activities identified in section 4.5 of the Interim Construction Noise Guideline as being particularly annoying to noise sensitive receivers, including surrounding residents.

### 2.2.3 idling and queuing construction vehicles

The EPA is aware from previous major infrastructure projects that community concerns are likely to arise from noise impacts associated with the early arrival and idling of construction vehicles (including concrete agitator trucks) at the development site and in the residential precincts surrounding that site.

#### **Recommendation**

The proponent be required to ensure construction vehicles (including concrete agitator trucks) involved in demolition, site preparation, bulk earthworks, construction and construction-related activities do not arrive at the project site or in surrounding residential precincts outside approved construction hours.

### 2.2.4 reversing and movement alarms

The EPA has identified the noise from 'beeper' type plant movement alarms to be particularly intrusive and is aware of feasible and reasonable alternatives. Transport for NSW, Barangaroo Delivery Authority/Lend Lease and Leighton Contractors have undertaken safety risk assessments of alternatives to the traditional 'beeper' alarms. Each determined that adoption of 'quacker' type movement/reversing alarms instead of traditional beepers on all plant and vehicles would not only maintain a safe workplace but also deliver improved outcomes of reduced noise impacts on surrounding residents. Appendix C of the ICNG provides additional background material on this issue.

#### **Recommendation**

The proponent be required to consider undertaking a safety risk assessment of site preparation, bulk earth works, construction and construction-related activities to determine whether it is practicable to use audible movement alarms of a type that would minimise the noise impact on surrounding noise sensitive receivers, without compromising safety.

## 2.3 Dust control and management

The EPA considers dust control and management to be an important air quality issue during demolition, site preparation, bulk earthworks and subsequent construction.

#### **Recommendation**

The proponent be required to minimise dust emissions on the site and prevent dust emissions from the site.

## 2.4 Sediment control

*Managing Urban Stormwater Soils and Construction, 4<sup>th</sup> Edition* published by Landcom (the so-called 'Blue Book') provides guidance material for achieving effective sediment control on construction sites. The proponent should implement all such feasible and reasonable measures as may be necessary to prevent water pollution in the course of developing the site.

The EPA emphasises the importance of –

- (a) not commencing demolition, site preparation, bulk earthworks, construction and construction-related activities until appropriate and effective sediment controls are in place, and
- (b) daily inspection of sediment controls which is fundamental to ensuring timely maintenance and repair of those controls.



## 2.5 Waste control and management (general)

The proponent should manage waste in accordance with the waste management hierarchy. The waste hierarchy, established under the [Waste Avoidance and Resource Recovery Act 2001](#), is one that ensures that resource management options are considered against the following priorities:

**Avoidance** including action to reduce the amount of waste generated by households, industry and all levels of government

**Resource recovery** including reuse, recycling, reprocessing and energy recovery, consistent with the most efficient use of the recovered resources

**Disposal** including management of all disposal options in the most environmentally responsible manner.

All wastes generated during the project must be properly assessed, classified and managed in accordance with the EPA's guidelines to ensure proper treatment, transport and disposal at a landfill legally able to accept those wastes.

The EPA further anticipates that, without proper site controls and management, mud and waste may be tracked off the site during the project.

### **Recommendation**

The proponent be required to ensure that:

- (1) all waste generated during the project is assessed, classified and managed in accordance with the EPA "*Waste Classification Guidelines Part 1: Classifying Waste*", November 2014 and the 2016 Addendum thereto;
- (2) the body of any vehicle or trailer, used to transport waste or excavation spoil from the premises, is covered before leaving the premises to prevent any spill or escape of any dust, waste, or spoil from the vehicle or trailer; and
- (3) mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site, is removed before the vehicle, trailer or motorised plant leaves the premises.

## 2.6 Waste control and management (concrete and concrete rinse water)

The EPA anticipates that during the project concrete deliveries and pumping are likely to generate significant volumes of concrete waste and rinse water. The proponent should ensure that concrete waste and rinse water is not disposed of on the project site and instead that –

- (a) waste concrete is either returned in the agitator trucks to the supplier or directed to a dedicated watertight skip protected from the entry of precipitation, and
- (b) concrete rinse water is directed to a dedicated watertight skip protected from the entry of precipitation or a suitable water treatment plant.

### **Recommendation**

The proponent be required to ensure that concrete waste and rinse water are not disposed of on the development site, and prevented from entering waters, including any natural or artificial watercourse.

### 3. Operational phase

The EPA considers that environmental impacts that arise once the development is operational should be able to be largely averted by responsible environmental management practices, particularly regarding:

- (a) feasible and reasonable noise mitigation measures;
- (b) waste management in accordance with the waste management hierarchy;
- (c) water sensitive urban design; and
- (d) energy conservation and efficiency.

#### 3.1 Noise and vibration impacts

The EPA anticipates the proposed development (especially out of hours use of school facilities by external parties) may have significant operational noise impacts on nearby sensitive receivers, especially adjoining residences and the adjoining pre-school.

The EPA notes with concern the proximity of the surrounding residences and is aware from long experience of the need for appropriate operational noise mitigation and management measures, particularly regarding:

- (a) the nature of and times during which school facilities are made available for community use;
- (b) the design and operation of the school public address/bell system;
- (c) the design and location of waste storage facilities;
- (d) time restrictions on waste collection services;
- (e) design, selection and operation of mechanical ventilation plant and equipment; and
- (f) time restrictions on grounds maintenance using powered equipment (e.g. leaf blowers, brush cutters and lawn mowers).

#### Background noise measurement

The EPA emphasises that properly establishing background noise levels in accordance with guidance material (i.e. Fact Sheets A and B) of the New South Wales Noise Policy for Industry (NPI) is fundamental to a consistent approach to the quantitative assessment of noise impacts of development.

Table A1 to NPI Fact Sheet A specifies that background noise monitoring should be undertaken at the reasonable most or potentially most affected residences. However, Figure 1 to EIS Appendix EE indicates that monitoring was not undertaken at the most affected residences but instead near the Beehag Street and Jacobson Avenue road frontages of the development site.

The NPI specifies that at least a 'weeks' worth' of monitoring data is required to establish background noise levels and that noise levels measured during rainfall should be excluded when deriving those background levels. However, EIS Appendix EE ambient noise level graphs indicate that only 2 days' worth of valid monitoring data was obtained for the day assessment period.

## Recommendation

The proponent be required to provide at least a week's worth of valid monitoring data to establish the background noise levels for each of the day, evening and night time assessment periods in accordance with guidance material provided in Fact Sheets A and B to the Noise Policy for Industry.

### Out of hours' community use of school facilities

The EPA is aware of government policy to encourage out of hours community use of school facilities provided that use does not cause noise emissions that interfere unreasonably with the comfort or repose of persons not on the premises. The EPA considers the proposed community use of school facilities (especially the hall and outdoor games/sports court) outside normal school hours needs to be carefully managed to ensure noise impacts on nearby residences are minimised.

The EPA is concerned that Table 15 to EIS Appendix EE –

- (a) refers to criteria for a period between 7.00 am and 11.00 pm yet the 'night' assessment period is between 10.00 pm and 7.00 am, and
- (b) makes no reference to the potential use of sound amplification systems or to typical community uses such as community band practice and weekend religious services.

## Recommendations

1. The proponent be required to ensure that the school hall is not made available for community use between 10.00 pm and 7.00 am Monday to Saturday and not at all on Sundays and public holidays, pending comprehensive noise compliance monitoring of representative uses of the hall.
2. The proponent be required to ensure that the outdoor games/sports court is not made available for community use –
  - (i) during week day mornings,
  - (ii) later than 6.00 pm on week nights,
  - (iii) other than between the hours of 8.00 am and 6.00 pm on Saturdays, and
  - (iv) during Sundays and public holidays,
 pending comprehensive noise compliance monitoring of representative uses of the court.
3. The proponent be required to –
  - (a) undertake comprehensive noise compliance monitoring of representative uses of the school hall and outdoor games/sports court and associated facilities (e.g. parking) outside school hours to demonstrate that the level, nature, quality and character of noise emitted by those uses and the time at which and frequency of those uses would not interfere unreasonably with or be likely to interfere unreasonably with the comfort or repose of persons not on the development site, especially the occupants of nearby residences.
  - (b) submit a detailed noise compliance monitoring report with noise measurements reported against relevant noise criteria and the outcomes of appropriate community consultation together with detailed recommendations concerning any additional feasible and reasonable noise mitigation and management measures, including further or more relaxed restrictions on the times at which and the frequency of each type of use of the hall and outdoor games/sports court and associated facilities (e.g. parking) outside school hours.

(c) ensure that noise compliance monitoring referred to in paragraph (a) above, would include quantitative noise impact assessment to address noise emissions arising from amongst other things:

- audience/spectator noise,
- referee whistle noise,
- training sessions as well as sporting events,
- any amplified sound during entertainment and sporting events, including any associated practice, rehearsal and training sessions), and
- post-event audience/spectator noise, including vehicle door slamming and departure noise.

### Mechanical plant and equipment

Section 6.1.3 to EIS Appendix H states that “ ... plant selections and locations are not finalised.”

### **Recommendation**

The proponent be required to:

- (a) provide a comprehensive quantitative assessment of operational noise impacts of mechanical plant and equipment (especially ventilation/ air conditioning plant and equipment) on surrounding noise sensitive receivers, especially surrounding residences;
- (b) ensure mechanical plant and equipment installed on the development site does not generate, (either individually or cumulatively) –
  - (i) noise emissions that exceed the Project Noise Trigger Level (day, evening and night assessment periods) measured at the boundary of adjoining residences and the most affected residences in Beehag Street and Jacobson Avenue, and
  - (ii) noise emissions that exhibit tonal or other annoying characteristics.

### Public address and school bell system

The EPA notes numerous reports of community concern arising from inadequate design and installation as well as inappropriate use of school public address and bell systems and considers that appropriate design, installation and operation of those systems can both –

- meet the proponent’s objectives of proper administration of the school and ensuring the safety of students, staff and visitors, and
- avoid interfering unreasonably with the comfort and repose of occupants of nearby residences.

### **Recommendation**

The proponent be required to design, install and operate the school public address/bell system to implement all such other measures as may be necessary to ensure use of that system does not interfere unreasonably with the comfort and repose of occupants of nearby residences.

### Waste collection services

EIS architectural drawings indicate the proposed location of the waste collection area close to the rear boundary of adjoining residences.

The EPA notes numerous reports of community concern arising from waste collection services undertaken at schools and especially –

- (a) where waste collection areas are located close to adjoining residences, and
- (b) when collections are undertaken during evening and night times.

### **Recommendations**

1. The proponent be required to ensure that the waste collection area is located as far away as practical from adjoining residences.
2. The proponent be required ensure waste collection services are not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.

### Grounds maintenance using powered equipment

The EPA is concerned that EIS section 4.14 (i.e. Table 7) proposes grounds maintenance using powered equipment between 6.00 am and 7.30 am weekdays.

The EPA notes numerous reports of community concern arising from grounds maintenance involving the use of powered equipment (example: leaf blowers, lawn mowers, brush cutters) at schools during early morning and evening periods as well as on weekends and public holidays.

### **Recommendation**

The proponent be required ensure grounds maintenance involving the use of powered equipment is not undertaken outside the hours of 7.30 am to 6.00 pm Monday to Friday.

### 3.2 Waste management

The proponent should manage waste in accordance with the waste management hierarchy outlined earlier.

### **Recommendation**

The proponent be required to identify and implement feasible and reasonable opportunities for the re-use and recycling of waste, including food waste.

### 3.3 Water sensitive urban design and energy conservation and efficiency

The EPA acknowledges that EIS Appendix O comprises an environmentally sustainable development report that proposes –

- (a) a range of water sensitive urban design measures, including –
  - (i) rainwater harvesting and re-use, and
  - (ii) water efficient fixtures; and
- (b) a range of measures to maximise energy efficiency and minimise energy consumption, including –
  - (i) natural ventilation and lighting of habitable spaces, and
  - (ii) installation of solar photovoltaic arrays

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