



Environment, Climate Change & Water

Your reference: MP 10_0173
Our reference: Part 3A, DOC10/47427,
File No. FIL10/13188
Contact: Alan Bawden
(02) 4908 6804

NSW Planning
Major Projects Assessment Unit
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Peter McManus

Dear Mr McManus

RE: APPLICATION AND PRELIMINARY ENVIRONMENTAL ASSESSMENT CENTRAL COAST CANCER CENTRE; GOSFORD – MP 10_0173

Reference is made to your letter dated 13 October 2010 and the attached Preliminary Environmental Assessment (PEA) report, requesting the Department of Environment, Climate Change and Water (DECCW) an opportunity to make a submission in respect to the proposed Director General Requirements [DGRs].

DECCW has considered the draft DGRs and provides the following comments:

Noise Impact Assessment

The Environment Assessment (EA) shall undertake an assessment of noise impacts associated with the construction and operation of the facility. In relation to construction DECCW recommends the assessment be in accordance with "NSW Interim Construction Noise Guidelines, DECC 2009" and for operational noise "NSW Industrial Noise Policy, January 2000".

Waste and chemicals

The EA must provide details of the quantity and type of any waste that is generated, received, handled, processed or disposed of at the premises. Waste must be classified according to DECCW's Waste Classification Guidelines (2008).

The EA must provide details of all waste management at the facility, including:

- a) the transportation, assessment and handling of waste arriving at or generated at the site
- b) any stockpiling of wastes or recovered materials at the site
- c) any waste processing related to the facility, including reuse, recycling, reprocessing or treatment both on- and off-site
- d) the end use or disposal method for all wastes or recovered materials at the facility

- e) details of specialised transportation requirements, including but not limited to waste tracking requirements or Dangerous Goods requirements.
- f) details of any permits or approvals which must be obtained and held for lawful transportation of waste and chemicals to and from the Premises
- g) the emissions arising from the handling, storage, processing and reprocessing of waste at the facility
- h) the proposed controls for managing the environmental impacts of these activities.

The EA shall provide details of procedures for the assessment, handling, storage, transport and disposal of all hazardous and dangerous materials used, stored, processed or disposed of at the site, in addition to the requirements for liquid and non-liquid wastes.

The EA shall provide details of the type and quantity of any chemical substances to be used or stored and describe arrangements for their safe use and storage.

In documenting or describing the composition of output products and/or wastes generated from the proposed facility reference should be made to DECCW's Waste Classification Guidelines (2008).

The EA should also provide details of any proposed leachate collection and management systems for contaminated run-off water from the site; and treatment systems ability to handle the additional load from the upgrade.

Construction

The EA shall provide a detailed description of all stages of construction including timeframes for completion. If any waste is proposed to be brought onto the site during the construction period, the proponent must provide details of the classification of the waste; the quantities of the waste; and the source location of that waste. If any waste is proposed to be transported off the site during the construction phase, the EA must provide details of:

- The types of waste leaving the site;
- The quantities of waste leaving the site;
- The transporters of the waste; and
- The final disposal or re-use location for the waste.

Water Quality Assessment

The proposal should clearly identify how it will meet the requirements set out in section 120 of the Protection of The Environment Operations Act 1997 (POEO) prohibiting pollution of waters. Assessment of all water pollution control associated with the construction and operation of the facility should reference "NSW Managing Urban Stormwater: Soils and Construction guidelines".

Air Quality Assessment

The PEA does not identify any potential emissions into the atmosphere from the proposal. Based on this PEA, DECCW has not provided Air Quality Impact Assessment criteria.

Threatened Species Assessment

The DGRs adequately address the requirements for flora/fauna assessment including provisions of the threatened species legislation.

Cultural Heritage

1. The EA should address and document the information requirements set out in the draft "Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation"

(Department of Environment and Conservation 2005). This document is available from the DECCW and DoP upon request.

2. The EA should include surveys by suitably qualified archaeological consultants in consultation with all of the local traditional Aboriginal custodians.
3. The EA should identify the nature and extent of impacts on ACH values across the project area and clearly articulate strategies proposed to avoid/minimise these impacts. If impacts are proposed as part of the final development, clear justification for such impacts should be provided.
4. The EA should assess the archaeological and Aboriginal significance of the site's ACH values.
5. Describe the actions that will be taken to avoid or mitigate impacts of the project on ACH values. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.
6. The EA needs to clearly demonstrate that effective community consultation with Aboriginal communities has been undertaken in assessing impacts, developing options and making final recommendations. DECCW supports broad-based Aboriginal community consultation and as a guide DECCW's '*Aboriginal cultural heritage consultation requirements for proponents 2010*' provides a useful model to follow.
7. If impacts on ACH values are proposed as part of the final development, an assessment of the regional significance of the values to be impacted, the extent to which these values are protected elsewhere in the landscape and consideration of the proposed impacts in the context of 'inter generational equity' should be undertaken.

Note: If the EA is relying on past surveys it is critical to confirm that the surveys are consistent with the requirements of the above Part 3A guidelines. Furthermore, if any new sites or objects are located, they should be recorded on NPWS site cards and registered on DECCW's Aboriginal Heritage Information Management System (AHIMS). AHIMS contact details: Phone: (02) 9585 6470, address: Level 6, 43 Bridge Street, Hurstville, NSW, 2220, e-mail: ahims@environment.nsw.gov.au.

If you require further information regarding this matter contact Alan Bawden on 4908 6804.

Yours sincerely



29 OCT 2010

Mark Hartwell
Head Regional Operations Unit
Hunter Region
Environment Protection and Regulation

