



DOC20/954210

18 November 2020

Mr Dimitri Gotsis
Senior Planning Officer
Social and Infrastructure Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Gotsis

**Redevelopment of Bankstown North Public School (SSD 10290)
Advice on Environmental Impact Statement (EIS)**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide comments on the Environmental Impact Statement (EIS) for the above State Significant Development (SSD) project. It is understood the project involves site remediation, the removal of temporary demountable classrooms, construction of two new buildings to provide additional home bases, library and other amenities, associated service upgrades, a new kiss-and-ride loop and landscaping works to accommodate an increase in student numbers to 644.

The EPA has reviewed the following EIS documents:

- *Environmental Impact Statement*, prepared by DFP Planning, dated 30 September 2020 (EIS main report)
- *Preliminary Environmental Site Assessment*, prepared by GeoEnviro Consultancy, dated 25 October 2018
- *Supplementary Contamination Assessment*, prepared by Alliance Geotechnical, dated 30 June 2020
- *Remedial Action Plan*, prepared by Alliance Geotechnical, dated 30 June 2020 (RAP)
- *Noise Impact Assessment*, prepared by Cundall, dated 17 April 2020 (NIA)
- *Mitigation Measures*, prepared by DFP Planning, dated September 2020.

Following is advice regarding noise and vibration, and contamination matters:

1. Noise and Vibration

The EPA notes that the noise criteria determined by the loggers appear to be representative of the acoustic environment of residential receivers. Although the noise monitoring has been undertaken on the subject property, not at residential receivers, the noise levels presented within the NIA appear to be reasonably representative of the noise level in the area.

Operational noise considerations do not include the preliminary review of predicted noise from service and mechanical plant. However, it is mentioned that noise from mechanical plant can be treated sufficiently following selection of the plant items and appropriately siting the equipment.

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The EPA recommends that the applicant ensure waste collection occurs during the day-time period only. The EPA also recommends conditions of consent for noise and vibration include:

- Standard hours for construction work, as described in Table 1 of the *Interim Construction Noise Guideline* (EPA, 2009); and
- Noise from mechanical plant is designed to achieve no greater than background noise + 5 dB.

Furthermore, any consent should require the proponent to adopt the noise mitigation described in:

- Section 4.2 *Noise egress design recommendations* in the NIA to manage potential operational noise impacts;
- Section 6.2 *Recommendation for construction noise management and mitigation* in the NIA to manage construction noise; and
- *Mitigation Measures* table (Appendix 2 of the EIS).

2. Contamination

The contamination assessment identified potentially unacceptable risks to human and ecological health due to asbestos, zinc, total recoverable hydrocarbons and benzo (a)pyrene at several locations.

The RAP that was prepared and submitted as part of the EIS needs to be certified as appropriate by a NSW-accredited site auditor. The site auditor should be engaged throughout the duration of works for this project to ensure that any work required in relation to soil or groundwater contamination is appropriately managed. It is recommended that interim audit advice is provided as part of the Response to Submission that comments on the nature and extent of contamination and whether the RAP is appropriate to make the site suitable for the proposed use.

The following conditions are recommended in any consent:

1. The applicant must engage a NSW EPA-accredited Site Auditor throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.
2. Prior to commencing with the remediation, the applicant must submit Interim Audit Advice from a NSW EPA-accredited Site Auditor that advises that the site can be made suitable for the proposed use subject to the implementation of the Remedial Action Plan.
3. The applicant must adhere to the management measures in the Remedial Action Plan as approved by the Site Auditor.
4. Any variations to the approved Remedial Action Plan must be approved in writing by the Site Auditor.
5. If work is to be completed in stages, the Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice/s.
6. The applicant must obtain a Section A1 Site Audit Statement – or a Section A2 Site Audit Statement accompanied by an Environmental Management Plan – from a NSW EPA-accredited Site Auditor and submit it to the consent authority prior to commencement of operation. The Site Audit Statement must certify the site is suitable for the proposed use.
7. Prior to occupation, the applicant must obtain confirmation from the Certifying Authority in writing that the requirement of condition 6 has been met.

The EPA is happy to further discuss the issues raised. Should you require clarification of any of the above please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au

Yours sincerely



SARAH THOMSON
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