



Our reference: : DOC19/1066295  
Contact: : Simon Lund – 02 6773 7000 – [armidale@epa.nsw.gov.au](mailto:armidale@epa.nsw.gov.au)  
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Social and Other Infrastructure Assessments.  
Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2001

Email: [iona.cameron@planning.nsw.gov.au](mailto:iona.cameron@planning.nsw.gov.au)

**BY EMAIL**

Attention: Ms Iona Cameron

Dear Ms Cameron,

**RE: Request for Advice – SSD 9613 – UNE New Wright Block**

I refer to the State Significant Development (SSD) application referred to the Environment Protection Authority (EPA) via the NSW Planning Portal, seeking comments on the Environmental Impact Statement for SSD 9095 – UNE New Wright Block development.

For the purposes of the *Protection of the Environment Operations Act 1997* (the Act), the proposed development is not a scheduled activity and will not require an Environmental Protection Licence from the Environment Protection Authority (EPA). The EPA does not have any formal regulatory role in the development, however we provide the following comments for your consideration.

Key issues of concern for the EPA relate to the management and disposal of waste including contaminated materials from construction works, sedimentation and stormwater management, dust management and noise management generated from the demolition and construction works associated with the proposal.

**Waste Management**

The EIS includes the following inter-related plans:

- Site Contamination Assessment Report at Appendix 8
- Hazardous Materials Report at Appendix 9,
- Waste Management Plan at Appendix 19, and an
- Integrated Waste Management Plan, at Appendix 26.

The EPA strongly encourages the proponent to continue to engage and consult directly with Armidale Regional Council regarding waste disposal and resource recovery. It is our understanding that the Armidale Waste Management Facility has limited capacity to accept large volumes of industrial waste and alternative disposal options may need to be considered.

We note the presence of polychlorinated biphenyls (PCBs) listed in the Hazardous Materials Report. We remind the proponent that any waste containing PCBs needs to be handled and disposed of in accordance with the Chemical Control Order for PCB contaminated waste.

We note that asbestos waste (friable and bonded) will also be generated during demolition of the buildings. We strongly encourage early engagement with Armidale Regional Council for the disposal of that waste to

ensure that the Waste Management Facility in Armidale has capacity to accept those volumes generated and ensure that alternative disposal sites can be found should they be required.

With the generation of any hazardous waste in NSW, that waste may trigger a requirement for that waste to be tracked. We encourage the proponent to ensure that they understand the requirements of waste tracking in NSW and that they ensure they implement any such requirement for any waste disposed of inter- and intra-state.

Any excavated soils should be classified in accordance with any relevant resource recovery exemption or order prior to that material being used as fill or disposed of. The resource recovery orders and exemptions can be found at: <http://www.epa.nsw.gov.au/your-environment/recycling-and-reuse/resource-recovery-framework/current-orders-and-exemption>.

## **Stormwater Management**

The EPA recommends that commitments made in the Stormwater Management Plan, (Appendix 10 of the EIS), be incorporated into the conditions of consent for the proposal, should consent be granted. We expect that erosion and sediment controls during the construction phase of the proposal be designed and implemented in accordance with the *Managing Urban Stormwater: Soils and Construction* publications.

## **Dust Management**

The proponent must, as far is practical, prevent and minimise the generation of air emissions, including dust generation, from the site. The EPA expects that dust management best practises and mitigation measures are identified and implemented as part of the Construction Environmental Management Plan for the development.

## **Construction Noise and Vibration**

The Construction Noise & Vibration Management Plan (CNVMP) (Appendix 26) identifies that noise from the construction activities will exceed the calculated  $L_{eq\ 15\ min}$  noise management levels at the nearest residential receivers. The CNVMP proposes a range of management and control measures that will ensure the level of noise from the construction works will be minimised as far as is reasonably practical.

We recommend that a noise validation assessment be carried out, prior to the construction works commencing, the considers all equipment to be used and all mitigation measures to be implemented at the development site. If predicted noise levels still exceed the calculated noise management levels, then the proponent should examine further feasible and reasonable works practices and/or mitigation measures that can be applied to minimise noise levels.

The Mechanical Noise Emission Assessment has been included in Appendix 17. The EPA recommends that any approval requires an acoustic assessment to be completed once the type and location of mechanical plant has been finalised and prior to the construction of the development. The mechanical plant should be selected, built and operated so that all mechanical plant, operating simultaneously, do not exceed the project specific noise criteria at any residence for the most restrictive period that the plant will be operating (e.g. air conditioners operating during the night time period).

Should any noise complaint be received regarding the development, we may require noise monitoring to be undertaken and/or additional noise mitigation measures to be implemented. Where noise impacts cannot be mitigated, we recommend that the proponent negotiates a private agreement with the noise affected resident(s).

Please contact Simon Lund on (02) 6773 7000 or by email to [armidale@epa.nsw.gov.au](mailto:armidale@epa.nsw.gov.au) to discuss the matter further.

Yours sincerely,



**REBECCA SCRIVENER**  
**Head Regional Operations Unit - Armidale**  
**Environment Protection Authority**