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13 July 2021

Ms Michelle Niles
Senior Planner
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

By email: michelle.niles@planning.nsw.gov.au

Dear Michelle

**New Primary School at Edmondson Park (SSD 10224)
EPA Advice on Environmental Impact Statement (EIS)**

I am writing to you in reply to your invitation to the NSW Environment Protection Authority (EPA) to provide comment on the Environmental Impact Statement (EIS) for the above project.

The EPA has reviewed the relevant sections of the EIS provided by the Department of Planning, Industry and Environment (DPIE) and advises the following regarding noise and vibration and contamination.

Noise and Vibration

The EPA reviewed the *Noise and Vibration Impact Assessment* (NVIA), Rev C, dated 14 May 2021, prepared by JHA. The EPA notes that standard hours of construction are proposed, in accordance with the *Interim Construction Noise Guidelines* (ICNG) (DECC, 2009), and that the applicant will identify appropriate noise mitigation measures for the project in a Construction Noise and Vibration Plan (CNVMP) with a list of general control elements identified in section 7.4.1 of the NVIA.

The EPA recommends consent including conditions that require the following:

- Standard construction hours in accordance with the ICNG;
- intra-day respite periods from high noise generating construction activities (including jack hammering, rock breaking, pile boring or driving, saw cutting); and
- The preparation and implementation of a CNVMP to identify the reasonable and feasible noise mitigation measures to be employed during construction.

The following operational measures are also recommended to be employed by the applicant:

- Noise from mechanical plant should be designed to achieve no greater than background noise + 5 dB;
- Waste collection should occur during the day-time period only; and
- The nature of and times during which school facilities (e.g. sports court, sports field and hall) are made available for community use should be identified.

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Contamination

The EPA reviewed the *Environmental Site Assessment*, Rev 0, 21 May 2021 prepared by JBS&G, and the *UXO Risk Assessment*, Ver 1.1, 14 May 2021, prepared by CSG Demining.

The *Environmental Site Assessment* concluded that based on the conceptual site model and the results, the proposed development will not pose unacceptable risks to human health. Given that unexpected contamination may be found during excavation activities at the site, **the EPA recommends an Unexpected Finds Protocol be submitted as part of the Applicant's response to submission.**

The EPA notes that the site was formerly used by Defence. The *UXO* (unexploded ordnance) *Risk Assessment* was prepared to assess, and make an informed judgment on, the potential UXO risk within the site. The UXO report concluded that the UXO risk at the site is as low as reasonably practicable. The report recommended that those who will be working on site should be advised about the management protocol if UXO is unexpectedly encountered at the site.

As this site is planned to be redeveloped for a more 'sensitive' use as a primary school, the EPA recommends that a Section B Site Audit Statement, prepared by a NSW EPA-accredited site auditor, is submitted as part of the RtS.

The EPA recommends the applicant submit a Section B Site Audit Statement and Site Audit Report from a NSW EPA-accredited site auditor certifying that:

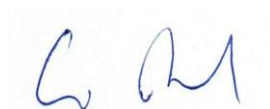
- the nature and extent of the contamination has been determined,
- the site can be made suitable for the proposed use,
- the unexpected finds protocol is appropriate, and that
- the UXO report is satisfactory. (Where it is not within an auditor's area of expertise to assess whether a site is safe or whether there has been an appropriate level of site investigation in relation to UXO, an auditor must obtain advice from someone qualified to draw conclusions on the presence of UXO or future likelihood of finding it on the site.)

The EPA considers that a site auditor's review of the contamination report can provide increased certainty to DPIE on whether the nature and extent of contamination has been appropriately determined, and whether the site can be made suitable for the proposed use if the Unexpected Finds Protocol is applied.

If unexpected contamination is found when works begin at the site, the EPA recommends that a NSW EPA-accredited site auditor be engaged throughout the duration of works. This is to ensure that any work required in relation to soil or groundwater contamination is appropriately managed, given the proposed sensitive land use as a primary school.

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



GEORGE OREL
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