



DOC20/695805

26 August 2020

Ms Minoshi Weerasinghe
Planning Officer
Key Sites and Industry Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Ms Weerasinghe

**Taronga Zoo – Upper Australia Precinct (SSD 10456)
Advice on Environmental Impact Statement (EIS)**

I am writing to you in reply to your invitation to the Environment Protection Authority (EPA) to provide input to the development of EIS for the above project.

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

Noise and Vibration

The EPA reviewed the EIS, dated 24 July 2020, prepared by Urbis and the *SSDA Acoustic Assessment*, dated 15 June 2020, prepared by Marshall Day.

Construction works are proposed to occur during standard construction hours only and the assessment indicates there will be periods of respite during high noise construction activities. The EPA notes that predicted noise levels are presented for the ground floor of receivers (modelled at 1.5 metres) including any intervening shielding and that “*noise levels at upper floors without shielding are likely to be higher*”. The predicted noise levels that are presented in the report do not exceed the highly noise affected level of the *Interim Construction Noise Guideline* (EPA, 2009) (ICNG) and are only 1-2 dBA above the noise affected management level.

The EPA considers that the noise from construction of the Upper Australia Precinct will need to be carefully managed and any project design features such as walls/fences (for example those set out in Section 7.1.2 of the EIS) should be erected early in construction to assist in mitigating construction noise. The EPA also concurs with the implementation of ‘noise control recommendations’ as set out in Section 10 of the acoustic assessment and the community consultation and noise management measures set out in Section 11 of the acoustic assessment.

The EPA notes that details of the mechanical plant and public address systems are not yet available. The EPA agrees with the statements in the acoustic assessment that the design and operation of these items will need to be carefully managed to minimise noise impact to sensitive receivers. It is recommended that the mechanical plant and public address systems are designed to comply

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cumulatively with other noise sources with the *Noise Policy for Industry* (EPA, 2017) Project Noise Trigger Levels, as described in the acoustic assessment.

Traffic and patron noise will also need to be carefully managed, as is the case with the existing operation of Taronga Zoo. The EPA expects that as the Upper Australia Precinct is an upgrade or replacement of existing exhibits within the zoo, it is not expected that noise from operation of the new precinct will differ vastly to existing operations.

Contamination

The EPA reviewed the *Report on Preliminary Site Investigation (Contamination) Investigation*, dated 21 December 2018 (PSI), and Chapter 7.12 of the EIS main report.

It is noted that the site has been a zoo for over 100 years and the PSI reported that the potential for contamination is low. No significant soil contamination was found in the analysed samples taken from the site. Due to the low risk of contamination, the EPA considers the inclusion of an unexpected finds protocol as a condition of consent would be sufficient to manage contamination risk on site.

However, given the age of the structures on site, a hazardous building materials survey is required to be conducted on the buildings prior to the commencement of any demolition / construction works on site.

The following conditions are recommended:

1. A **hazardous building materials survey** must be conducted on the buildings prior to the commencement of any demolition/construction works on site
2. An **Unexpected Contaminated Land and Asbestos Finds Procedure** must be prepared before the commencement of any demolition / construction works and must be followed should unexpected contaminated land or asbestos be excavated or otherwise discovered during construction. The Unexpected Contaminated Land and Asbestos Finds Procedure must outline the steps to be undertaken to identify, report and manage any signs of potential environmental concern encountered during earthworks/redevelopment works.
3. The **Unexpected Contaminated Land and Asbestos Finds Procedure** must be implemented throughout construction. If unexpected contamination is found, the applicant must conduct site investigations to determine the full nature and extent of the contamination at the project area. The site investigations must be undertaken, and the subsequent report/s, must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the *Contaminated Land Management Act 1997*.

In addition, the EPA reminds the applicant of the following:

1. The processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55) are to be followed in order to assess the suitability of the land and any remediation required in relation to the proposed use.
2. The proponent must ensure 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 [note that this would render the proponent the 'person responsible' for the contamination under section 6(2) of *Contaminated Land Management Act* (CLM Act)].
3. The EPA should be notified under section 60 of the CLM Act for any contamination identified which meets the triggers in the Guidelines for the Duty to Report Contamination www.epa.nsw.gov.au/resources/clm/150164-report-land-contamination-guidelines.pdf

4. The EPA recommends use of “certified consultants”. Please note that the EPA’s Contaminated Land Consultant Certification Policy (<https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/clm/18520-contaminated-land-consultant-certification-policy.pdf?la=en&hash=D56233C4833022719BCE0F40F870C19DC273A1F7>) supports the development and implementation of nationally consistent certification schemes in Australia, and encourages the use of certified consultants by the community and industry. Note that the EPA requires all reports submitted to the EPA to comply with the requirements of the CLM Act to be prepared, or reviewed and approved, by a certified consultant.

Soil and Erosion Management

The EPA also emphasises the importance of not commencing earthmoving or vegetation removal until appropriate erosion and sediment controls are in place. Daily inspection of erosion and sediment control is fundamental to ensuring timely maintenance and repair of those controls.

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

A handwritten signature in blue ink that reads "Sarah Thomson". The signature is written in a cursive, flowing style.

SARAH THOMSON
Unit Head
Regulatory Operations Metro South