

## 5.0 Preliminary Assessment

It is requested that the Director General issue the requirements for an environmental assessment to accompany a Project Application for the proposed development.

The requirements will identify the key issues to be addressed, the level of assessment required in relation to these issues and any other requirements in accordance with the environmental assessment guidelines.

The information below has been prepared to assist the Director-General in identifying the general requirements and key environmental issues associated with the project.

### 5.1 Compliance with Statutory Plans

### 5.2 Approvals and Permits

In the absence of the provisions of Part 3A of the EP&A Act, the proposed development may have required approvals and permits under the following Acts:

- Heritage Act 1977

The relevant agency will be consulted during the preparation of the environmental assessment.

### 5.3 Matters of National Environmental Significance

There are no known matters of national environmental significance on the site.

### 5.4 Key Environmental Impacts

The key environmental considerations associated with the proposed development are as follows:

- Heritage (Built Form & Archaeology)
- Contamination / Remediation
- Demolition Management (Waste and Air & Water Quality)
- Traffic
- Noise & Vibration
- Infrastructure
- Staging

## Heritage

The Conservation Management Plan prepared by Noel Bell Ridley Smith in 2005 identifies 34 buildings / structures on the site as being of a level of moderate or higher heritage significance. The approved Concept Plan provides for the retention of 29 of these buildings / structures and the Draft SEPP amendment proposes to include these buildings / structures nominated for retention as protected heritage items.

### **Built Form Heritage Items**

It is not expected that there will be any significant impact on the 29 buildings to be retained. The proposed demolition works relate to the removal of above ground buildings / structures, the associated footings and ground slabs only. In order to ensure the proposed scope and methodology of the demolition works will not have any affect on the structural stability of the items to be retained, a suitably qualified heritage practitioner and a structural engineer will be commissioned to review and advise on the scope of works and demolition methodology. An assessment of impacts and recommendations will be provided in the Environmental Assessment.

In accordance with Concept Plan Commitment No. 8, the existing buildings to be demolished will be recorded by a suitably qualified heritage expert prior to demolition works. The recording will be undertaken in accordance with the schedule of significance and processes set out in the Conservation Management Plan.

As the scope of this task is quite extensive it is proposed to submit the archival information on a building by building basis.

### **Archaeology**

The Blackwattle Creek stormwater channel is an item of State Significance on the Sydney Water Section 170 Heritage Register. An Archaeological Assessment prepared by Godden Mackay Logan for the preparation of the Concept Plan identified that a 'zone of sensitivity' extending 2 metres from the existing easement should be established in order to protect the archaeological heritage item.

In order to ensure that the proposed demolition works are consistent with the recommendations of the Godden Mackay Logan report, a suitably qualified archaeological expert will be commissioned to review and advise on the proposed work methodology.

An assessment of impact and appropriate recommendations relating to the demolition methodology will be provided in the Environmental Assessment.

The assessment will also demonstrate compliance with Concept Plan Commitment No. 9 and the Godden Mackay Logan Archaeological Assessment.

## Contamination / Remediation

Previous site investigations have determined that some buildings and some areas of filled ground within the application site are contaminated due to past activities which were carried out on the site and by contaminated ground water flowing into the site from an off-site source south of Wellington St.

During these investigations, twenty five (25) areas of potential contamination were identified.

The demolition works will include removal from site to specified locations of all hazardous materials within buildings and structures.

The in-ground contamination will be remediated as part of the bulk excavation works, subject to a separate application

The proposed works relevant to this project application involve the demolition of identified above ground structures and the lifting and removal of services, slabs and footings associated with those above ground structures. No other surface disturbance is proposed or required. It is therefore proposed to prepare a Stage 1 Remediation Action Plan (RAP) which will address the minor remediation activities associated with the scope of demolition works proposed. The RAP will be prepared in accordance with SEPP 55 and will fulfil the requirements of Condition A19 of the Concept Plan approval. Further RAPs will be prepared for subsequent stages of works as relevant and required.

It is noted that a remediation strategy has already been prepared for the site. However, this particular remediation strategy is only relevant to later stages of the development when deep ground excavation will occur.

## Demolition Management

A Environmental & Construction Management Plan (E&CMP) will be prepared which will cover the following:

### **Waste:**

It proposed that the demolition works at Frasers Broadway will constitute one of the biggest recycling projects to be conducted in Sydney. It is expected that the following amounts of materials will be collected and recycled:

- 50,000 tonnes of concrete;
- 8,700 tonnes of brick;
- 3,900 tonnes of steel; and
- 50 tonnes of timber.

All crushable materials will be taken off-site for re-processing as specified raw materials for concrete and road-base

Metals will be processed on site and will then be on-sold from site to scrap merchants.

Timber will be processed on site and either on-sold from the site or re-used

In addition to the above it is expected that the following non-recyclable materials will also be collected:

- 6,100 tonnes of rubbish; and
- 500 tonnes of materials contaminated by asbestos.

Specifically the following waste issues will be addressed:

- Demolition wastes that may be generated (quantities – volume and weight, identification, proposed disposal method and destinations);
- Details of onsite and off-site recycling;
- Removal of hazardous waste;
- Hazard & Emergency Management Plan; and
- Potential toxicity levels of loads transported on arterial and local roads and the consequential preparation of an incident management plan.

It is expected that approximately 90% of all materials created by the demolition process will be re-cycled.

Frasers Broadway will implement a management plan that will include recording of all materials produced by the demolition and the tonnage of each material processed and recycled.

#### **Air Quality**

The proposed demolition works have the potential to affect air quality by way of dust emissions and exhaust fumes. As such it is proposed that the following will be addressed in the E&CMP:

- Emissions of dust generated by demolition activities;
- Wind erosion from exposed surfaces and stockpiles;
- Impact of exhaust emissions from vehicles and other motorised equipment; and
- Preparation of a Dust, Odour and Air Quality Management Plan.

#### **Water Quality**

Similarly the proposed works have the potential to affect water quality by way of stormwater run-off and increased sedimentation. It is proposed that the E&CMP will address these issues, including:

- Existing stormwater drainage location including downpipes, connection and discharge points;
- Potential for water pollutants to be generated;
- Measures taken to collect, store and treat stormwater;
- Materials storage areas;
- Management methods to ensure that sediment is not transported from the site;
- Monitoring proposals; and
- Preparation of erosion & sediment control plans.

## Traffic

A Demolition Transport Management Plan will be prepared by a suitably qualified consultant and will address the following issues:

- Traffic Impact Study (estimated number of truck movements);
- Potential impacts on local public transport;
- Opportunities to maintain pedestrian access and safety adjacent to the subject site for the period of activity;
- Proposed means of vehicular access to and from the site and safety of proposed access points;
- Impact of generated traffic upon the surrounding arterial road network and intersections; and
- Details of anticipated truck routes to minimise impacts on neighbours.

## Noise & Vibration

As the site is in close proximity to residential development, the potential for impacts on the acoustic privacy of neighbouring residents exists.

An Acoustic Impact Statement will be prepared by a suitably qualified consultant who will review the proposed works methodology and will advise of appropriate mitigation measures to minimise potential impact. Similarly an assessment on potential vibration impacts will also be prepared.

## Infrastructure

A suitably qualified expert will be commissioned to prepare a report regarding the proposed methodology of decommissioning the identified services and infrastructure.

The report will also outline infrastructure which is to be retained on the site and the works that will be required to maintain infrastructure which also provides services to surrounding development.

Further discussions will also be held with Rail Corp and Energy Australia regarding the existing and future infrastructure to be provided on the site.

## Staging

It is currently programmed that the works will be carried out over a 15-18 month period. The first stages of the demolition works will be carried out on blocks 1 and 4, followed by blocks 2 and 5. The diagram at Appendix D shows the proposed demolition stages and indicative timing of the demolition works.

In order to ensure that the works are carried out in a safe and environmentally sensitive manner, a Construction Management Plan will be prepared.

## 6.0 Conclusion

The information contained in this preliminary assessment is to assist the Director General in determining the level and scope of any requirements for an environmental assessment to accompany a project application for initial demolition works at Frasers Broadway.

Having regard to the above and in accordance with provisions in Part 3A of the EP&A Act, it is requested that the Director General issue the environmental assessment requirements for the Project Application.