

City of Sydney

ABN 22 636 550 790

GPO Box 1591 Sydney NSW 2001 Australia

Town Hall House 456 Kent Street Sydney NSW 2000 Australia

Phone +61 2 9265 9333 Fax +61 2 9265 9222 TTY +61 2 9265 9276

council@cityofsydney.nsw.gov.au www.cityofsydney.nsw.gov.au



24 April 2012

Kerrie Symonds
Sydney Metropolitan Development Authority
PO Box 1198
Strawberry Hills NSW 2012

By email: Kerrie.symonds@smda.nsw.gov.au

PD File: S092295 and S103975
TRIM Ref: 2012/088726-21
DA Ref: R/2009/59 (MP08_0015)

**Subject: NORTH EVELEIGH AFFORDABLE HOUSING PROJECT
EARLY WORKS AND INFRASTRUCTURE WORKS
Request for Comments on Part 5A submission**

Dear Ms Symonds

Thank you for the opportunity to comment on the above-mentioned proposal to be carried out under Part 5A of the Environmental Planning and Assessment Act 1979. The following submission is made with reference to the letter from Jason Perica dated 22 March 2012 and the draft Review of Environmental Factors prepared by JBA Planning for the works.

In accordance with the Infrastructure SEPP (clause 42 (2)) the City provides the following comments and recommendations on the proposal and would like to stress the importance of incorporating these recommendations into the proposed works given the Sydney Metropolitan Development Authority's (SMDA) preference to dedicate the land, the subject of this submission, to the City.

The City's comments and recommendations on the proposed works are outlined below:

Issues	Comments/Recommendations
a. Heritage	a. <u>Archival recording of heritage buildings</u> A copy of the archival recording of the heritage buildings, including photographs and drawings to scale, should be deposited to the City of Sydney's Archives. The affected buildings include: the Reclamation Shed, Air Raid Shelters, Spring Store, and Timber Shed Extension. In addition, the outcome of further investigation of the Brick Retaining Wall along Wilson Street and any archaeological investigation reports should be provided to the City's Archives for heritage inventory catalogue upgrading.

city of villages

	<p>b. <u>Industrial heritage investigation and involvement of industrial heritage consultant</u></p> <p>It is unclear whether the remaining machinery associates to the North Eveleigh Workshops have been systematically investigated by professionals who are competent in industrial heritage. It appears that the Heritage Impact Statement for both the Concept Plan and current early work plan do not address any movable industrial items on the site or give due assessment. For instance, the remaining machinery (two sets of tankers) between the Reclamation Shed and Wilson Street, are not mentioned in the heritage report. An industrial heritage consultant should be involved in the archaeological investigation and salvage of significant industrial items before and during the site clearance and excavation work. The consultant may also provide advice on exhibiting salvaged items and interpretation plans so that the industrial character of the area can be retained. (It is noted that a catalogue of machinery items at south Eveleigh has been developed in the 1995 CMP (heritage conservation management plan)).</p> <p>c. <u>Further investigation of the rail tracks</u></p> <p>The extent of original rail tracks at the western part of North Eveleigh has not been fully identified. As the tracks are to be reinstated on the new road, it is important that the purpose and extent of the rail tracks and their western termination points are understood. A further study may predict any buried or removed tracks beyond the Timber Shed Extension and make the reinstatement / interpretation of the tracks more meaningful.</p> <p>d. <u>Salvage of structure timber and steel work</u></p> <p>Structural timber or steel work demolished from the existing buildings should be properly assessed and salvaged. The salvaged materials may be reused in the public spaces (pocket parks) to enhance the industrial theme of the precinct.</p>
<p>b. Urban Design</p>	<p>a. <u>Height of Railcorp access driveway</u></p> <p>Cross section C of the driveway access to the Railcorp substation indicates the road will be more than 3m above Iverys Lane. It is noted that the western side of the lane is within a heritage conservation area and the character of low scale traditional terrace housing is protected by the planning controls. The high retaining wall on the laneway and a driveway above will likely impact the visual and privacy amenity of terrace houses facing Holdsworth Street and should be revised. The driveway level should largely follow the existing ground and any height increases should be minimised.</p>

	<p>b. <u>Graded entry park</u></p> <p>The concept for the entry park is a graded / terraced park from Wilson Street. The role of the park as proposed is largely visual rather than available for use.</p> <p>Currently, the land is benched and generally flat within the North Eveleigh precinct and could potentially be made useable. The existing trees retain the soil and are important to the streetscape of Wilson Street, providing a green edge.</p> <p>Alternative design proposals should be considered for this pocket part so that the space can be used and tree retention is maximised – or at least to demonstrate / justify the current design approach.</p>
<p>c. Public Domain</p>	<p>a. <u>Future Open Space and Substation Access</u></p> <p>The design of the works must consider circulation to and from the future open space areas, including the location, level and layout of access paths.</p> <p>The proposal indicates that the temporary substation access road, proposed central road and surrounding future open space area will be raised above the current site levels. The design levels need further investigation to ensure that these spaces appropriately marry in to the surrounding neighbourhood and future park design. The area should be significantly lowered from the proposed design levels to ensure adequate site circulation is provided within the precinct and to surrounding areas.</p> <p>b. <u>Iverys Lane Access</u></p> <p>A pedestrian access way is proposed to link the site with Iverys Lane and regionally to Erskineville Station and McDonald Town Station. This circulation link is supported and should be further enhanced. The applicant is to consider providing disabled access and provisions for cyclists (rather than the stair access currently proposed).</p> <p>The footway on both sides of Iverys Lane is extremely narrow, (less than 700mm wide). The narrow footway forces pedestrians to walk on the roadway. The footway in Iverys Lane should be widened to provide an accessible route to the site. It is suggested the retaining structure proposed at the boundary of the site along Iverys Lane be set back to allow the eastern footway of Iverys Lane to be widened. A 1500mm wide footway is recommended as a minimum.</p> <p>c. <u>Disabled Access from Wilson Street</u></p> <p>The provision of disabled access from Wilson Street into the site has not been proposed as part of this application but as part of future works.</p>

It is considered critical that disabled access to the site from Wilson Street adjacent to the vehicle entry point is delivered as part of the early works (with the road).

A 1:14 ramp on the south side of the new roadway has been suggested by the applicant, however the impact of this continuous ramp and steep levels would impact negatively on the adjoining future park to the south. The design should be revised or further justification provided for the current proposal.

d. Accessibility & circulation

Further detail is to be submitted to Council to show the circulation routes and treatments through the whole precinct and how the site has been designed to link into the surrounding neighbourhood, transport links, village hubs and public domain (pedestrian and cycle network).

These routes need to be sign-posted and clearly delineated in design of this site and must be detailed in the construction submission.

e. Central Road

The interface between the site and the adjoining Carriageworks site is unclear. Further detail of this area is to be submitted to the City including the proposed extent of works (some work within the Carriageworks site may be required), levels, materials selection, bollard use and similar.

On street disabled parking spaces are not supported as currently shown and should be redesigned.

The footway design to both sides of the new road is to be consistent, with either a turf/planted verge with street trees or no verge with street trees to both sides of the roadway.

f. Material Selection

The material/finish for the footway, kerb and gutter is generally supported, however further construction level documentation is to be submitted to the City for approval prior to construction.

Street furniture selection and placement is to be approved by the City.

The kerb is to provide sufficient visual contrast between the footway and road to ensure equal access requirements are met.

g. Precinct Based Approach to Design

The *'Early Works and Infrastructure Works'* must be coordinated with the whole North Eveleigh development precinct. Specific issues that must be coordinated include, but are not limited to:

	<ol style="list-style-type: none"> I. Public Domain finishes and streetscape design are to be consistent across the precinct, and in accordance with the City's standards. A hierarchy of streets and associated finishes may be appropriate; II. The interface between this project site and adjoining sites, specifically existing streets, the Carriageworks site, future parks and access paths through the park and future roads; III. Future road junctions with the central access road; ensuring allowance for sufficient footway widths once future roads are built; locate bioretention / raingarden and planting to enable future roads to be built with little or no impact on planting implemented as part of the early / infrastructure works; IV. Street lighting able to be adapted to a future one-way road system; V. Circulation routes through the site and to adjoining areas, with particular focus on cycle movement and accessible paths.
<p>d. Traffic and Parking</p>	<ol style="list-style-type: none"> a. <u>Wilson Street access point</u> The Wilson Street entry to the site is to be a formal kerb return / road arrangement (not a driveway crossover). b. <u>One way loop</u> It is understood that a temporary two-way road is proposed as part of the Phase 1 works, but that the ultimate arrangement for the site is proposed to be a one-way loop. The applicant must provide a design, including cross-sections, to demonstrate that conversion is possible, and will be contained within the proposed road reservations. These plans must be submitted to, and approved by the City. c. <u>Swept Paths</u> The applicant must submit a set of swept path drawings to the City showing all vehicle movements and manoeuvres at the site. This must include, but not be limited to the following: <ul style="list-style-type: none"> • The largest vehicle entering and exiting the site at Wilson Street; • The largest vehicle entering and exiting the Railcorp private access driveway; • The largest vehicle performing a turning movement at the end of the new road adjacent to the Carriageworks site.

d. Turning Area

The applicant must provide a turning area at the end of the proposed road adjacent to the Carriageworks site to suit the temporary two-way road arrangement. If the road is to be dedicated to Council, the applicant will need to ensure the turning area is all provided within land that will be dedicated to Council. If the road is not dedicated then this could occur within the land adjacent to the Carriageworks building.

If the latter is proposed the applicant will need to provide information with their swept paths to show what impacts this will have on the parking and the operation of the Carriageworks building.

At the northern side of the eastern end of the new road, the lack of a proper kerb will cause pedestrian safety problems. The City does not accept bollards in such locations. The design of the turning area must be reviewed to address these comments.

e. Pedestrian crossings

Raised speed tables are proposed across the central road to align with pedestrian access points. The raised thresholds are not formalised into pedestrian crossings creating confusion between motorists and pedestrians, as to who has right of way. This creates safety issues that are not acceptable, and do not meet Roads & Maritime Services (RMS) or City guidelines. The raised thresholds are not supported and should be deleted from the application.

Pedestrian access from Wilson Street and across the new road should be aligned so that a formalised raised pedestrian crossing could be considered and accepted in accordance with RMS requirements. The location of kerb blisters and pedestrian crossing points are to be reviewed to consider the location of future road junctions to ensure minimal disruption during the construction of future stages.

The construction of a raised crossing is to form part of the developer's works, at the developer's cost and be completed prior to the issue of 'Certificate of Completion' for the works.

f. Construction Management Plan – Traffic

A Construction Management Plan (CMP) is to be submitted to and approved by the City prior to start of construction.

The following City requirements for traffic are to be incorporated in the submitted CMP;

- I. The adjacent streets have load limits that prevent trucks from using them unless they have a direct destination in those particular streets.

	<p>Construction trucks for this site must use the closest direct link to the nearest State Road – ie. trucks must use City Road into Golden Grove Street and then into Wilson Street and vice versa. No other residential street is to be used by trucks.</p> <ol style="list-style-type: none"> II. The approved truck route plan shall form part of the contract and must be distributed to all truck drivers. III. All vehicles must enter and exit the site in a forward direction. IV. All Traffic Control Plans associated with this Construction Traffic Management Plan must comply with Australian Standards and RMS Traffic Control at Work Sites Guidelines. V. The applicant must provide the City with details of the largest truck that will be used during the demolition, excavation and construction, as part of the CMP application and prior to the start of any work on site, and must obtain approval from the City’s Construction & Regulation unit for the use of this vehicle. VI. NOTE: No dog trailers are to be used without approval from the City’s Construction & Regulation unit. VII. The developer must obtain a permit from the City’s Construction & Regulation unit regarding the placing of any plant/equipment on public ways. VIII. No queuing or parking is permitted in any public road. IX. All vehicles associated with the development shall be parked wholly within the site. All site staff associated with the works are to park in a designated off street area. No staff are to park on the street. X. All loading and unloading must be within the development site or at an approved “Works Zone”. XI. The applicant must comply with development consent for hours of construction. XII. Traffic Controllers are NOT to stop traffic on the public street(s) to allow trucks to enter or leave the site. They MUST wait until a suitable gap in traffic allows them to assist trucks to enter or exit the site. The Roads Act does not give any special treatment to trucks leaving a construction site - the vehicles already on the road have right-of-way. XIII. Trucks are at no time allowed to reverse into the site from the road for safety reasons (unless specific approval is obtained from the City’s Construction & Regulation unit).
--	--

	<p>XIV. Pedestrians may be held only for very short periods to ensure safety when trucks are leaving or entering BUT pedestrians must NOT be stopped in anticipation of a truck movement - ie. at all times pedestrians have right-of-way on the footpath, not trucks.</p> <p>XV. Physical barriers to control pedestrian or traffic movements need to be determined by the City's Construction & Regulations unit prior to commencement of work.</p> <p>XVI. Any temporary adjustment to a Bus Stop or Traffic Signals will require the applicant to obtain approval from the State Transit Authority (STA) and RMS respectively prior to commencement of works.</p> <p>XVII. The developer must apply to the City's Construction & Regulations unit to organise approvals for cranes and barricades etc.</p> <p>XVIII. The developer must apply to the City's Building Compliance unit to organise approvals for hoarding prior to commencement of works.</p> <p>XIX. The developer must apply to the City's Work Zones Co-ordinator to organise appropriate approvals for the Work Zones.</p> <p>XX. The CMP relates to traffic and parking impact only. It is not an approval of the applicant's Traffic Control Plans. WorkCover requires that Traffic Control Plans must comply with Australian Standards 1742.3 and must be prepared by a Certified Traffic Controller (under RMS regulations).</p> <p>XXI. The provision of any information in the CMP will not exempt the developer from correctly fulfilling all other conditions relevant to the development consent for the above site.</p>
<p>e. Road Network and Geometric Road Design</p>	<p>a. Detailed design and construction documentation for the proposed public road system shall include all necessary liaison with public utility authorities, the RMS, Council, and its nominated consultants in order to achieve design approvals and construction compliance.</p> <p>b. The design and construction of all road works shall be undertaken in accordance with the City's Development Specification for Civil Works (Design and Construction). Detailed plans and construction specifications for the works shall be prepared and certified as complying with the City's specifications prior to the issue of a Construction Certificate. The detailed plans and supporting documentation shall include as a minimum the following information:</p>

	<ul style="list-style-type: none"> I. General subdivision plan with contour details, clearly indicating the extent of work; II. Typical road cross sections showing road and footway widths, footpath grade, pavement configuration, batter slopes, retaining wall, kerb and gutter types; III. Plan and longitudinal section of the public road showing services; IV. Drainage plan and schedule of drainage elements; V. Drainage profiles and longitudinal section; VI. Road longitudinal sections involving gutter, kerb, center line and building alignments VII. Road cross sections and kerb returns; VIII. Road pavement structure , kerb and gutter, drainage works, traffic and pedestrian signage, and any necessary minor works and matching adjustments; IX. Minimum 500 mm wide road restoration detail; X. Footpaths, pedestrian and bicycle facilities, street lights and street trees and other associated verge works; XI. Adjustments/upgrades to utility services as required; XII. Intersection layout details including line marking, pavement marking and signposting; XIII. Standard engineering and structural details plan; XIV. Erosion and sedimentation control plans; XV. Compliance with all relevant Council requirements including, road opening permits, public liability insurance and compliance with Council' Quality Assurance for design(design certification report and check lists 1-9 from Council's Development Specification for Civil Works),Quality System requirements involving construction inspection and supervision procedures; XVI. Drainage pit lids throughout the public domain shall be heel guard and bicycle safe, finished flush with the adjacent pavement to avoid trip hazards and be clear of obstructions for easy opening and cleaning. Drainage pit lids shall be in accordance with Council Standards. <p>c. Infrastructure documentation must be fully coordinated with the Public Domain Plan and must be submitted to the City's Public Domain unit for review and approval</p>
--	--

	<p>prior to commencing construction.</p> <p>The City's acceptance of the completed Public Domain Works and issue of the final 'Certificate of Completion' will be subject to demonstration of compliance with the approved drawings, the Development Specification for Civil Works (design and construction), applicable standards and Certified 'Works as Executed' drawings, warranties and other certified documentation as appropriate.</p> <p>Note: All design documentation shall be completed in accordance with the relevant standards and specifications as adopted by the City from time to time. All engineering plans and calculations shall be checked, signed and certified by a suitably qualified practicing professional Engineer.</p>
<p>f. Alignment Levels</p>	<p>a. Prior to the lodgement of the first Project Application for Phase 1 works or start of construction of the '<i>Early Works and Infrastructure Works</i>', alignment levels for all roads and footpaths (existing and proposed) must be submitted to and be approved by the City. The submission must be prepared by a Registered Surveyor, must be in accordance with the City of Sydney's Public Domain Manual and must include the interface between the public, proposed public and private property areas including adjacent Phase 2 building envelopes.</p> <p>These alignment levels, as approved by the City, are then to be incorporated into the plans submitted with the application for the buildings.</p>
<p>g. Bioretention /rain gardens</p>	<p>a. <u>Drainage and water Quality</u></p> <p>The rain gardens proposed at A1.1 and A1.5 are very small. These should be enlarged to maximise the benefits of the rain gardens given that the proposed pits will take up a significant area.</p> <p>The bioretention/raingardens should be consolidated into large planted beds where possible. Small areas of planting, or singular trees between parking bays, are prone to damage and prove unsuccessful in the long term. The layout, location and size of the bio-retention/raingardens should to be reviewed to eliminate the small plant beds.</p> <p>Plant species and swale details are to be approved by the City.</p> <p>The documentation provided is unclear about the location of the proposed connection into the City's stormwater system in Iverys Lane. The submission must clarify if the connection is proposed at the northern or southern end of Iverys Lane.</p>

<p>h. Street Trees</p>	<p>a. <u>Proposed Street Tree Plantings</u></p> <p>Street trees are proposed along the southern side of the new road, which is supported.</p> <p>Street trees are to be planted on both sides of the new central roadway in the footway at the back of kerb. The northern footway is shown 3m wide and therefore provides ample room for street tree planting.</p> <p>Street tree species selection is to be approved by the City, and selected in accordance with the City's Street Tree Master Plan 2011.</p> <p>b. <u>Existing Street Tree Protection</u></p> <p>No existing street trees in Wilson Street are approved for removal.</p> <p>Street trees must be protected in accordance with the Australian Standard 4970 Protection of Trees on Development Sites and Council Guidelines and the City's standards, to be advised by the City's Tree Management unit.</p> <p>Excavations within 3 metres of any existing Council street trees must be undertaken using non-destructive methods (such as an Airspade) to ensure no tree roots greater than 40mm diameter are damaged, pruned or removed. Work must be supervised by a qualified Consultant Arborist, who holds the Diploma in Horticulture (Arboriculture), Level 5 under the Australian Qualification Framework.</p> <p>Consent from Council must be obtained prior to the undertaking of any tree pruning including tree roots greater than 40mm diameter. Only minor pruning works will be approved by Council.</p>
<p>i. Lighting</p>	<p>a. Details of the proposed lighting are to be submitted and approved by the City prior to a Construction Certificate being issued.</p> <p>b. Lighting design documentation must comply with the City's Draft Interim Sydney Lights Design Codes and lighting policies.</p> <p>c. The lighting of public areas within the development must comply with AS 1158.3.1:2005 Category P2.</p> <p>d. Lighting upgrades are required along major pedestrian and vehicular traffic routes connecting the proposed development and the commercial strip along King Street and Abercrombie Street, Sydney University and the two nearby railway stations.</p>

	<p>This may be achieved by upgrades on existing Ausgrid Street lighting network. Lighting improvements have recently been implemented along Wilson Street, except for the intersections at Fitzroy Street and Forbes Street that are outstanding. The following Streets may require lighting upgrades:</p> <ul style="list-style-type: none"> ▪ Leamington Lane ▪ Iverys Lane ▪ Queens Street ▪ Fitzroy Street ▪ Forbes Street and ▪ Golden Grove Street <p>e. Street lights are to be located on one side of the new central roadway if possible.</p>
<p>j. Footpath Damage Bank Guarantee</p>	<p>a. A Footpath Damage Bank Guarantee for a sum to be determined by Council for the site frontages must be lodged with Council in accordance with the City of Sydney’s adopted Schedule of Fees and Charges. The Footpath Damage Bank Guarantee must be submitted as an unconditional bank guarantee in favour of Council as security for repairing any damage to the public domain in the vicinity of the site.</p> <p>The guarantee must be lodged with Council prior to work commencing, including preparatory, remediation and demolition work.</p>
<p>k. Stormwater Management Plan</p>	<p>a. It is proposed to convey the site runoff and external catchment runoff with a pipe and overland system through Iverys Lane. Additional flow (particularly overland) generated by the development must also be assessed to ensure that the properties adjacent to the laneway are not adversely affected.</p> <p>b. Holdsworth Street/ Leamington Lane already experience severe flooding. Directing additional runoff to these areas will worsen flooding. This issue must be assessed and mitigation measures proposed accordingly as part of the Construction Certificate stage submission.</p> <p>c. It is noted that the Stormwater Management Plan for the site proposes that overland flow will be directed to a local pond. The overland flow from the site / pond must be conveyed safely through a defined path to a public drainage system. A flood assessment is required to prove that any proposal to direct overland flow does not adversely impact any other properties or development.</p> <p>d. Furthermore, if the pond is located outside the Phase 1 development site, the submission must document whether this arrangement will remain beyond Phase 1, or else document the future scenario. It is therefore not acceptable to direct overland flows into this pond</p>

	<p>without adequate legal arrangements (ie. easements and positive covenants in favour of Council).</p> <p>e. The proposed bioretention solution to address the stormwater quality issues may not be adequate to removing gross pollutants. The pipe drainage should include gross pollutant traps (GPTs) to capture gross pollutants.</p> <p>f. On site detention (OSD) requirement are to be provided in accordance with Sydney Water's final detail design documentation approval.</p>
I. Subdivision Certificate	<p>Subdivision of the site will require a separate application to obtain consent from the Consent Authority / future land owner and subsequent issue of a Subdivision Certificate. Note that the City must be appointed as the Principal Certifying Authority (PCA) for works on land to be dedicated to the City, in accordance with the Environmental Planning and Assessment Act 1979.</p>
m. Easements	<p>Existing and proposed easements are to be depicted on a plan and accompanied with an appropriate Section 88B of the Conveyancing Act 1919, to Council's satisfaction.</p>
n. Proposed Dedication	<p>a. <u>Timing – Adjoining Building Works</u></p> <p>The road infrastructure is proposed to be constructed as part of Phase 1 with buildings to follow as Phase 2.</p> <p>The City will not accept dedication of new roads while the site is undergoing construction. For this reason the dedication of the road infrastructure is to be deferred until all the buildings have been constructed.</p> <p>b. <u>Timing – Traffic Arrangement</u></p> <p>Section 116 of the Roads Act sets out some requirements for conversion of a dedicated road from two-way to one-way, including approval by the City and RMS, community consultation and media advertising. As such dedication of the road network to the City will not be accepted until the final arrangement (proposed one-way loop) has been completed.</p> <p>The one-way section has been described by the applicant as necessary to achieve the on-street parking levels required by the consent. An additional (approximately) 14 parking spaces will be created by the conversion from two-way to one-way. The dedication of the road will not be accepted until the on-street parking levels required by consent have been achieved, and all associated kerb and gutter, signage, public domain works have been complete.</p> <p>The proposed substation access road is to be a temporary structure intended for demolition to allow the construction of the final circulation road and is to remain in private ownership (not dedicated to the City).</p>

	<p>c. <u>Standard of Work</u></p> <p>All works to land proposed to be dedicated to Council are to be in accordance with City’s standards and requirements including;</p> <ul style="list-style-type: none"> ▪ Development Specification for Civil Works (design and construction) ▪ Public Domain Manual ▪ Sydney Streets Design Code (note; this site is considered a ‘special precinct’ and approved variation from standard details may be acceptable). ▪ Parks Technical Manual (note; approved variation from standard details may be acceptable as approved by the City). ▪ Street Tree Masterplan 2011. <p>The land proposed for dedication to Council, including roads, public domain and parks, will require certified engineering and landscape architectural design plans and documentation to be approved by Council prior to construction. Prior to acceptance of the land all associated works are to be completed in accordance with the approved plans and to the satisfaction of Council and ‘as-built documentation’ and certifications are to be submitted to the City.</p>
<p>o. Health Compliance Site Remediation</p>	<p>a. <u>Land Contamination</u></p> <p>The site must be remediated in accordance with the NSW EPA Site Auditor’s (Rod Harwood, Environmental Strategies Pty Ltd) recommendation contained within the Site Audit Statement (Section B) reference No 107, dated May 2011 and the Report on Remedial Action Plan prepared by Consulting Earth Sciences dated 18/12/2009.</p> <p>Any variations to the proposed and Site Auditor approved Remediation Action Plan shall be approved in writing by the Accredited Site Auditor and the Consent Authority prior to the commencement of such work.</p> <p>Prior to the exportation of waste (including fill or soil) from the site the material should be classified in accordance with the provisions of the Protection of the ‘Environment Operations Act1997 and the NSW EPA Environmental Guidelines Assessment, Classification and Management of Non- Liquid Wastes’. The classification of the material is essential to determine where the waste may be legally taken. The Protection of the Environment Operations Act 1997 provides for the commission of an offence for both the waste owner and the transporter if the waste is taken to a place that cannot lawfully be used as a waste facility for the particular class of waste. For the transport and disposal of industrial, hazardous or Group A liquid waste advice should be sought from the EPA.</p>

	<p>b. <u>Site Audit Statement</u></p> <p>Prior to the built form of the development taking place a Site Audit Statement (Section A) must be obtained from the Site Auditor clearly confirming that the site <u>is suitable</u> for the proposed land use. Where the Site Audit Statement is subject to conditions that require ongoing review by the Auditor or Council these should be discussed with the Consent Authority before the Site Audit Statement is issued.</p> <p>c. <u>Hazardous Materials - Asbestos removal</u></p> <p>A detailed hazardous materials assessment of all structures proposed to be demolished should be obtained for approval prior to any demolition works taking place.</p> <p>All demolition works involving the removal and disposal of asbestos cement must only be undertaken by contractors who hold a current WorkCover Asbestos or "Demolition Licence" and a current WorkCover "Class 2 (Restricted) Asbestos Licence and removal must be carried out in accordance with National Occupational Health and Safety Commission (NOHSC): "Code of Practice for the Safe Removal of Asbestos" and the City of Sydney Asbestos Policy.</p> <p>Prior to the exportation of waste (including fill or soil) from the site, the waste materials must be classified in accordance with the provisions of the Protection of the 'Environment Operations Act 1997 and the NSW DECC Waste Classification Guidelines, Part1: Classifying Waste (April 2008)'. The classification of the material is essential to determine where the waste may be legally taken. The Protection of the Environment Operations Act 1997 provides for the commission of an offence for both the waste owner and the transporters if the waste is taken to a place that cannot lawfully be used as a waste facility for the particular class of waste. For the transport and disposal of industrial, hazardous or Group A liquid waste advice should be sought from the EPA.</p> <p>Asbestos to be disposed of must only be transported to waste facilities licensed to accept asbestos. No asbestos products are to be reused on the site (i.e. packing pieces, spacers, formwork or fill etc).</p>
<p>p. Construction Regulation</p>	<p>The following requirements apply:</p> <p>a. Compliance with the Local Government Act, including the need to obtain approval for any activity that may occur in, on or over the public way / City property.</p> <p>b. A Construction Management Plan is to be submitted to the consent authority/City for approval prior to any</p>

	<p>works commencing.</p> <p>The plan should in particular outline the level of community consultation that is to be implemented prior to and during the works, the potential level of noise impact that will impact upon neighbouring noise sensitive receivers, the acoustic controls that will be implemented in order to reduce those impacts and the community complaints process that will be followed should a complaint concerning offensive noise be received. Reference should be made to the noise criteria contained within the City of Sydney Construction Hours/Noise Code 1992.</p> <p>The plan should also outline environmental management controls that will be implemented onsite in order to minimise airborne dust emissions and potential pollution of land and stormwater from sediment run off and dewatering activities.</p> <p>c. A Road Opening Permit must be obtained prior to works being undertaken on the public way.</p> <p>d. Compliance with development consent conditions and subsequent approvals and instructions from the City.</p> <p>e. <u>Construction hours</u></p> <p>The submitted Review of Environmental Factors states construction hours will be 07.00am to 7.00pm Monday to Friday and 07.00am to 5.00pm on Saturdays. The general hours approved by the City for development sites located outside the CBD area are however as follows:</p> <p>07.30 to 5.30 Monday to Friday, 07.30 to 3.30pm on Saturdays with no Sunday or Public Holiday working.</p> <p>Note: that the specific construction hours for the works will be approved through a separate application to City's Construction Regulation unit based on the works to be undertaken at the site.</p> <p>f. Adherence to the requirements within the Protection of the Environment Operations Act - ie. noise, land or airborne pollution.</p>
--	---

If you would like further information or clarification on the issues and recommendations made in this letter please contact Alphonsus Rajaratnam on 9246 7553 or email arajaratnam@cityofsydney.nsw.gov.au

Yours sincerely



Pam Urquhart
Public Domain Manager