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Project 216255.01  
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R.003.Rev2  
PG:jl

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## **Advice on Remediation Action Plan Requirement The Gables New Primary School Fontana Drive, Gables**

### **1. Introduction**

#### **1.1 General**

This Advice on Remediation Action Plan Requirement letter has been prepared by Douglas Partners Pty Ltd (DP) on behalf of NSW Department of Education (the Applicant) to assess the potential environmental impacts that could arise from the development of The Gables New Primary School at Lot 301 DP 1287967 on Fontana Drive, Gables (the site).

This letter has been prepared to provide advice on the requirement for a Remediation Action Plan (RAP) in relation to the proposed Box Hill (The Gables) new public school at Lot 301 Fontana Drive, Gables as requested.

This report accompanies a Review of Environment Factors (REF) that seeks approval for the construction and operation of a new primary school at the site, which involves the following works:

- Construction of school buildings, including learning hubs, a school hall and an administration and library building;
- Construction and operation of a public preschool;
- Delivery of a sports court and fields;
- Construction of car parking, waste storage and loading area;
- Associated site landscaping and open space improvements; and
- Associated off-site infrastructure works to support the school, including (but not limited to) services, driveways and pedestrian crossings.

For a detailed project description, refer to the Review of Environmental Factors prepared by Ethos Urban.

## 1.2 Statement of significance

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed development, it is determined that:

- The extent and nature of potential impacts from the proposed development are low from an environmental engineering perspective, and will not have significant adverse effects on the locality, community and the environment if the comments and recommendations in this letter are followed; and
- Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community by following the comments and recommendation in this report.

## 2. Background and assessment

Under Chapter 4, Clause 4.6 of State Environmental Planning Policy (Resilience and Hazards) 2021, *a consent authority must not consent to the carrying out of any development on land unless—*

- (a) It has considered whether the land is contaminated, and*
- (b) If the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

Douglas completed a detailed site investigation (DSI), in consideration of the proposed redevelopment. The results were documented in *Report on Detailed Site Investigation (Contamination), Box Hill (The Gables) New Public School, The Gables Public School, Sydney*, dated 14 November 2024 (Douglas, 2024). The DSI was undertaken with reference to NSW EPA and NEPM (2013). Concentrations of the contaminants of potential concern (CoPC) in all analysed soil samples were within the adopted site assessment criteria, and asbestos was not detected in the analysed soil samples.

Based on the results, the DSI report concluded that the site is suitable for the proposed primary school development subject to implementation of the following recommendations:

- An unexpected finds protocol (UFP) should be prepared and implemented during site works to address any potentially impacted fill (including asbestos contamination); and
- Additional assessment as required to provide a final waste classification for surplus soils requiring off-site disposal.

With no identified soil contamination, the report did not conclude that active remediation is required in order for the site to be suitable for the proposed development. The recommendations provided are therefore limited to typical construction practices. If any previously undetected contamination is found, the procedures in the recommended unexpected finds protocol for the identification, assessment and, if needed, remediation will be implemented.

In this regard, it is Douglas' opinion that a RAP is not required for the project.

The limitations provided in DP (2024) are also applicable to the advice in this letter.

### 3. Mitigation measures

The mitigation measures for the REF deliverables for the proposed development at the site relevant to this letter are summarised in Table 1.

**Table 1: Summary of Risk Mitigation Measures**

<b>Project Stage</b> <b>Design (D)</b> <b>Construction (C)</b> <b>Operation (O)</b>	<b>Mitigation Measures</b>	<b>Relevant Section of Report</b>
C	If any previously undetected contamination is found, the procedures in the recommended unexpected finds protocol for the identification, assessment and, if needed, remediation will be implemented.	Section 2

Please contact the undersigned if you have any questions on this matter.

Yours faithfully

**Douglas Partners Pty Ltd**



**Cathy Li**

Environmental Engineer

Reviewed by



**Paul Gorman**

Principal