

29/04/2025

Paul Hunter  
NSW Department of Education  
8 Central Avenue  
Eveleigh, NSW 2015

Dear Paul,

**Subject: P25011 - Bungendore North Campus High School, Majara Street, Bungendore.**

## Introduction

This letter has been prepared to support a Review of Environmental Factors (REF) for the NSW Department of Education (DoE) for the construction and operation of the new Bungendore North Campus High School (the activity). In addition, new demountable classrooms will be established.

The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37A of the T&I SEPP.

This document has been prepared in accordance with the *Department of Planning, Housing, and Infrastructure (dphi) Guidelines for Division 5.1 assessments (the Guidelines)*, the *Addendum Division 5.1 guidelines for schools*, and the *Addendum October 2024* (Consideration of environmental factors for health services facilities and schools).

The purpose of this letter is to support the REF submission for Bungendore North Campus High School and be read in conjunction with the report titled ‘*Detailed Site Investigation (Contamination), New Bungendore High school in Bungendore*’ dated 7 May 2024 (reference P24017\_DSI\_20240507) previously provided to support a State Significant Development Application (now not proceeding).

## Objective

The objective of this letter was to assess whether the site may have changed since the 2024 investigation was completed and provide advice to support a Review of Environmental Factors (REF) for the NSW Department of Education (DoE) for the construction and operation of the Bungendore North Campus High School.

## Scope of Work

The scope of work for the assessment was as follows:

- Review the previous contamination assessment from May 2024.

- Visit the site to assess whether the site has changed and whether there may have been activities that could introduce contamination since the previous sampling.
- Confirm the suitability of the proposed land use and recommend relevant mitigation measures where necessary.
- Prepare a brief letter report presenting the results of the gap analysis.

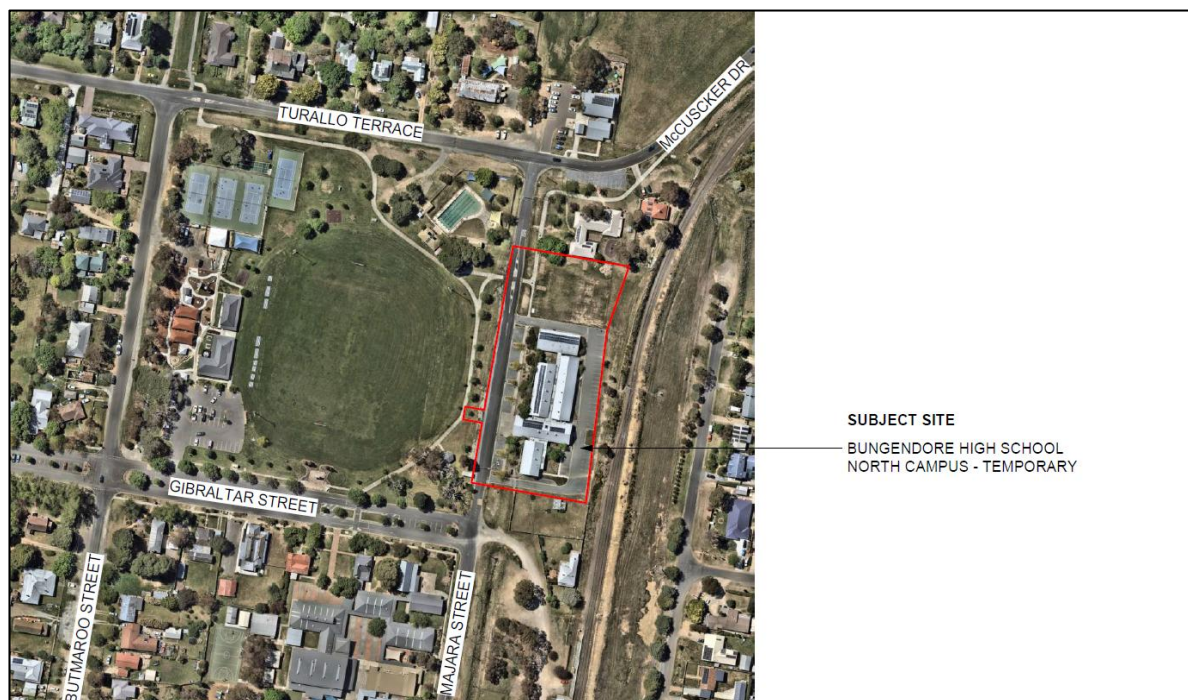
## Site Description

The project site, and land to which the REF applies (the site) includes Nos. 4-6, and 10 Majara Street, part Lot 1 DP 1276279 (Majara Street road reserve) and part Lot 1 DP 1276282 **Figure 1**.

As shown at **Figure 2**, the Bungendore North Campus High School will utilise the former Council administration building and car park located at 10 Majara Street. Demountable buildings are proposed to be placed north of the existing building. Public domain upgrades will feature in part Lot 1 DP 1276279 and part Lot 1 DP 1276282.

The site is located between Mick Sherd Oval (to the west) and the rail corridor (to the east). The site is located approx. 170m north of the Bungendore Train Station and Bungendore Primary School. The Bungendore Primary School, located on the corner of Gibraltar Street and Majara Street currently accommodates Bungendore High School on a temporary basis.

**Figure 1** Aerial Photograph of the Site



Source: TKD, 2025

## Proposed Activity Description

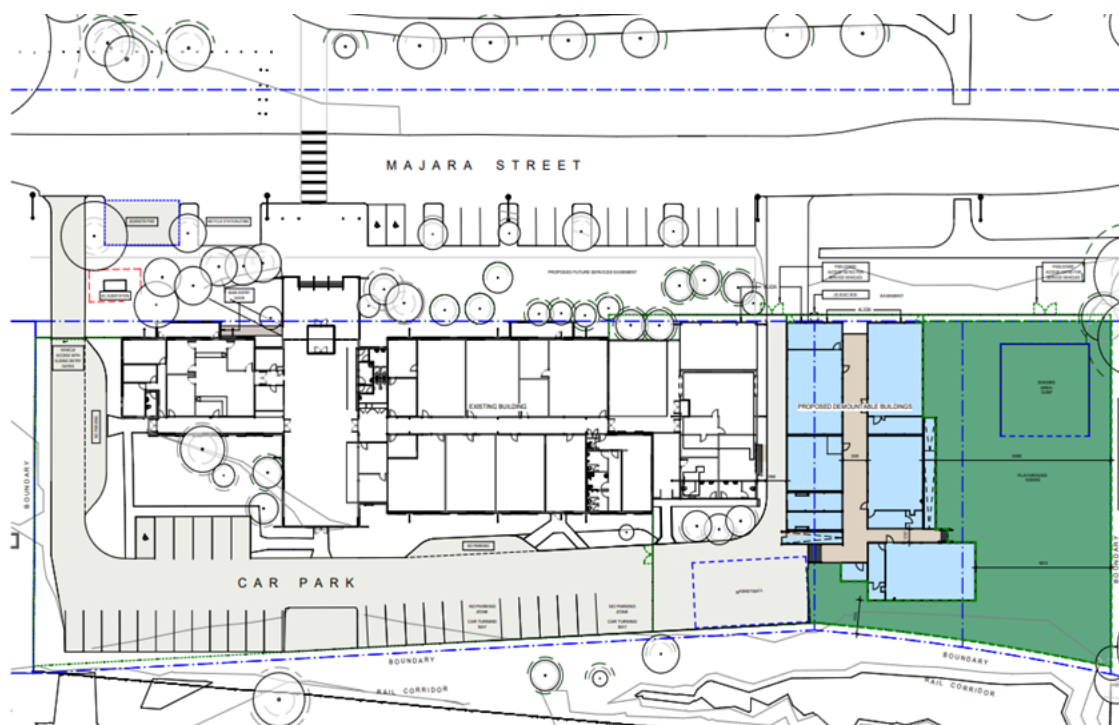
The proposed activity is for the construction and operation of the new Bungendore North Campus High School. The high school will accommodate the operational needs of the high school on a temporary basis (together with the existing high school located within the grounds of Bungendore Public School) as students as enrolments continue to grow. These facilities will be utilised until such time the permanent high school at Birchfield Drive is established.

Specifically, the project involves the following:

- Use of the former Council administration building as part of the new Bungendore North Campus High School,
- New demountable classrooms,
- Landscaping, outdoor play areas, shade structure and basketball court,
- On site staff parking which utilises the existing car park and access from Majara Street, and
- Public domain upgrades to part Lot 1 DP 1276279 (Majara Street Road reserve) and part lot 1 DP 1276282 to enable kiss and drop from Majara Street and pedestrian connectivity to surrounding areas.

Refer to the Review of Environmental Factors (REF) for the detailed scope of works and operational details.

**Figure 2** provides an extract of the proposed Overall Campus Plan.



Source: TKD, 2025

## Evaluation of Environmental Impacts

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 are low and will not have significant impact on the locality, community and/or the environment.
- Potential impacts can be appropriately mitigated or managed to ensure that there is no significant impact on the environment.

## Previous Environmental Investigations

The detailed site investigation was completed to assess the suitability of the site from a contamination perspective.

The site is in close proximity to the existing Bungendore Public School which is located to the south, enabling the creation of an education-style precinct.

Douglas Partners completed an investigation in 2022; however, several data gaps were identified, and Lanterra was engaged to undertake a supplementary investigation to fill these gaps so a statement of suitability (from a contamination perspective) under the SSDA for use of the site as a high school could be made.

The scope of work for the investigation was:

- A review of previous investigations across the site.
- A suitably qualified environmental consultant identified the proposed sample locations on site, and a Telstra Accredited Service Locator cleared each location of underground services.
- A suitably qualified and experienced contractor was engaged to drill boreholes across the site with the aid of a backhoe.
- Undertake intrusive investigation across the identified areas for further environmental investigation within the site, including constructing forty (40) boreholes for soil sampling.
- Undertake soil and water analysis at a National Association of Testing Authorities (NATA) accredited laboratory for the analyses of contaminants of potential concern (COPCs).
- Assess laboratory results obtained from the investigation against the applicable land use criteria, particularly the proposed high school.

**Figure 1, Appendix A**, shows the locations where samples were collected by Douglas Partners and Lanterra.

Visual observations made during the drilling of boreholes and collection of samples indicated the following:

- Fill was observed across the site to a maximum depth of 1.5 m in borehole BH14, which was located outside the area that is the subject of the REF. Natural material, comprising of pale brown to yellow-orange sandy silt to sandy clayey silt was encountered in each borehole.
- Anthropogenic material, comprising of brick and possible asbestos containing material was observed in the area around boreholes BH26 and BH27. It is noted that these locations were situated to the north of the Community Centre building.
- No olfactory indicators of contamination were noted.

The following samples were submitted to the laboratory for the analysis of the following COPCs:

- Twenty-seven (27) samples were analysed for Total Recoverable Hydrocarbons (TRH)
- Twenty-seven (27) samples were analysed for Benzene, toluene, ethylbenzene and xylenes (BTEX)
- Twenty-seven (27) samples were analysed for Polycyclic Aromatic Hydrocarbons (PAH)
- Six (6) samples were analysed for Organochlorine and Organophosphate Pesticides (OCP/OPP)
- Six (6) samples were analysed for Phenols
- Six (6) samples were analysed for Polychlorinated Biphenyls (PCB)

- Twenty-seven (27) were analysed for Heavy Metals (arsenic, cadmium, chromium, copper, lead, mercury, nickel and zinc).

The results of the laboratory analyses were as follows:

- Concentrations of TRH, BTEX, PAH, OCP/OPP, PCB, Phenols and heavy metals were below the adopted assessment criteria for the protection of human health and ecological receptors.
- Asbestos was detected in sample BH27 0.0-0.1 where a fragment of cement sheeting was found. This was found outside the area which is subject to the REF.
- No asbestos fines or fibrous asbestos (AF/FA) was identified in any analysed samples.

Based on the results of the investigation, the following conclusions and recommendations were made:

- Based on the investigation's results, remediation of approximately 200 m<sup>2</sup> where the asbestos containing materials were detected in the soil. The impacted area is located to the north of the Bungendore Community Centre building and outside the REF area.
- The site was considered suitable for the new Bungendore North Campus High School.
- It was recommended that a construction environmental management plan (CEMP), which includes an unexpected finds protocol (UFP) to manage any unexpected occurrences of contamination should they be encountered during the site's development, be prepared prior to any construction work commencing.

Due to the presence of asbestos being identified to the north of the Bungendore Community Centre, a remedial action plan (RAP) outlining the remediation strategy for the asbestos contamination soil was prepared in May 2024. The RAP was reviewed by Mr Loek Munnichs who is a NSW EPA accredited Contaminated Land Auditor who supported the proposed remedial strategy. However, as the location of the asbestos impact is outside the site boundary, the advice provided by the Auditor is not relevant.

## Site Visit

A suitably qualified environmental consultant from Lanterra visited the site on 10 February 2025. The purpose of the investigation was to visually assess the site for any changes since the contamination assessment was completed in 2024 and to determine whether there were new activities that could introduce contamination to the site.

Observations made during the site visit are presented below:

- A temporary fence secured the site. The fence extended from Gibraltar Street to the southern boundary of the Community Centre building and to the opposite side of Majara Street. Since the previous investigation was completed in 2024, the extent of the boundary fence has decreased, where the former fence line was located closer to the adjacent Mick Sherd Oval.
- No other buildings were located on the site other than the former council building. The site sheds that were present on Lots 13 and 14 DP1139067 in 2024 had been removed by 10 February 2025.
- No visual or olfactory indications of contamination were noted during the site visit.

## Mitigation Measures

While extensive sampling has been completed in accordance with the appropriate guidelines, each sample only represents the condition of soil at a specific condition and does not guarantee that soil between samples is free of contaminants. To manage this risk, it was recommended that a CEMP, which includes an UFP, be prepared and implemented before any construction work commences.

Mitigation Number	Timing	Mitigation Measure	Reason for Mitigation Measure
C01	Construction	Contractor to provide a CEMP, which includes an UFP, be prepared and implemented before any construction work commences.	To reduce risk of contamination disturbance.

## Conclusions

Based on the results of this gap analysis, the following conclusions are made:

- The site area has been reduced from the original contamination assessment completed in 2024. As a result, the small area affected by asbestos in the soil is now outside the site boundary of the Bungendore North Campus High School.
- The concentrations of other COPCs were below the adopted criteria, and the site was considered suitable for the Bungendore North Campus High School.
- Observations made during the site visit on 10 February 2025 did not identify any activities that may have introduced contamination to the site since the completion of the contamination assessment by Lanterra in 2024.

Based on the outcomes of the previous environmental investigation, the site is considered suitable for the Bungendore North Campus High School. No further contamination assessment is required, however, should the site boundary be altered, then these conclusions should be reviewed and revised, if necessary.

As the site has been the subject of a contaminated land audit, this gap analysis letter should be submitted to the Auditor for comment.

Subject to implementing the requirements set out in the Mitigation Measures section of this report, the site is suitable for the new Bungendore North Campus High School.

Should you have any questions regarding this letter, then please do not hesitate to contact the undersigned.

Sincerely

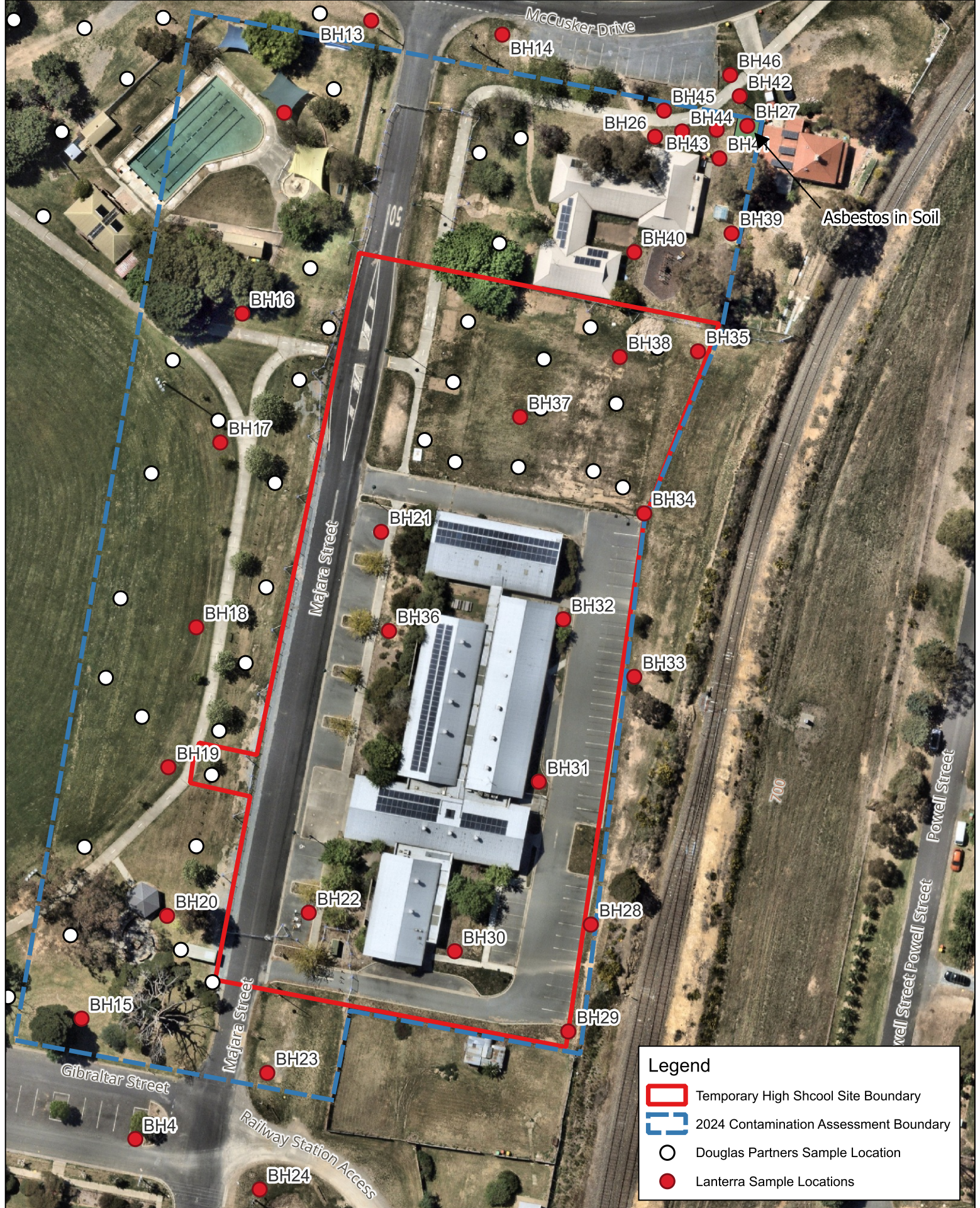


Chris Gunton  
Principal Environmental Scientist  
0432 324 348

## **Appendix A**

### Figures





Legend

Temporary High Shcool Site Boundary

2024 Contamination Assessment Boundary

Douglas Partners Sample Location

Lanterra Sample Locations

N

lanterra consulting

Unit 13/71 Leichhardt Street, Kingston, ACT2604

ABN 30 629 182 823

0

15

30 m

FIGURE 1: Site Location Plan

PROJECT No:	P25011
PROJECT:	Temporary Bungendore High School Gap Analysis
LOCATION:	Majara Street, Bungendore
CLIENT:	Colliers
Image Source:	Nearmap December 2023
Coordinate System:	GDA 2020 MGA Zone 55



## **Appendix B**

### Site Photographs

**Client Name**

Colliers

**Site Location**

Temporary Bungendore High School

**Project No.**

P25011

**Photo No.**

1.

**Date**

10/02/2025

**Description**

Photograph looking east at the southern extent of the former Council Building which is to be converted to the temporary Bungendore High School



**Photo No.**

2.

**Date**

10/02/2025

**Description**

Photograph looking southeast at the former Council Building which is to be converted to the temporary Bungendore High School





**Client Name**

Colliers

**Site Location**

Temporary Bungendore High School

**Project No.**

P25011

**Photo No.**

3.

**Date**

10/02/2025

## Description

Photograph looking east at the northern extent of the former Council Building which is to be converted to the temporary Bungendore High School



**Photo No.**

4.

**Date**

10/02/2025

## Description

Location of asbestos impacted soil north of the Community Centre Building which is outside the proposed temporary Bungendore High School

