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17<sup>th</sup> November 2023

Waverley Council

cc: Jeremy Bryden Via Email: j<u>eremy@blare.com.au</u>

## SUBJECT: Interim Audit Advice #5

## SITE: 669 – 683 Old South Head Road, Vaucluse, NSW

To Whom It May Concern,

I have been appointed by the proponent as the NSW EPA Accredited Site Auditor for the project.

I understand the subject site is being considered for development. The proposed development includes a multi story seniors living complex with two level basement parking.

The development will result in accessible soils for landscaping and gardening. On that basis the proposed land use is consistent with the National Environmental Protection (Assessment of Site Contamination) Measure 1999 (2013) Residential A conceptual site model.

Geo-Environmental Engineering (GEE) was appointed by the proponent to conduct contamination assessment of the land in accordance with the steps outlined in the State Environmental Planning Policy (Resilience and Hazards) 2021. The reports prepared by GEE to date include:

- Preliminary and Detailed Site Contamination Investigation, Proposed Seniors Living Development, 669 – 683 Old South Head Road, Vaucluse NSW. Geo-Environmental Engineering, 16<sup>th</sup> Nov. 2023. Ref: E23026VAU-RO2F.
- Remedial Action Plan, Proposed Seniors Living Development, 669-683 Old South Head Road, Vaucluse NSW. Geo-Environmental Engineering, 16<sup>th</sup> Nov 2023. Ref: E23026VAU-R03F.

I have conducted a review of the reports and provided interim audit advice throughout the project. The site has been residential since the 1930s therefore the potential for significant contamination of the land is very low. GEE correctly identified lead and asbestos as potential contaminants originating from the buildings, and petroleum, polyaromatic hydrocarbons, metals, PCBs and pesticides as potential contaminants associated with some minor filling across the land.

Soil sampling across the land identified lead in soil at concentrations exceeding health-based investigation levels for the proposed residential land use. GEE established the contamination to be limited to the topsoil covering.

GEE prepared a Remediation Action Plan (RAP) to remove the topsoil from the site post demolition. The RAP has been prepared in accordance with the guidelines approved under s105 of the Contaminated Land Management Act. The RAP adequately outlines the remediation methodology, health and environmental controls to minimise impacts during remediation, and validation strategy to verify remediation and confirm the site is suitable for the proposed land use.

I can confirm the RAP is practicable and if implemented will render the site suitable for the proposed land use. At completion, a Section A Site Audit Statement shall be prepared confirming the remediation of the land was conducted in accordance with the RAP and that the site is suitable for the proposed residential land use.

Please do not hesitate to contact me on 9979 1722.

Yours sincerely

Geo-Logix Pty Ltd

David Gregory
NSW EPA Contaminated Site Auditor #1501

This interim advice is limited to Audit review of the subject reports. It does not constitute a site audit report or statement, nor does it pre-empt the conclusions to be drawn at the end of the site audit process.