

10 July 2015

Our ref: ENAURHOD01055AA-L01

NSW Public Works - Government Architect's Office
Level 18, McKell Building
2 - 24 Rawson Place
Sydney NSW 2000

Attention: Mark van Exter

Dear Mark

**Auditor Opinion - Revised Concept Design Plans for Proposed School Development
Burroway Road, Wentworth Point NSW**

I was engaged as a NSW EPA accredited Site Auditor by NSW Public Works – Government Architect's Office to conduct a non-statutory site audit regarding suitability of land for development of a proposed primary school on land known as Part No. 3 Burroway Road, Wentworth Point NSW (the site). The site is the western part of Lot 2 in DP 859608 and has an area of approximately 1.46 hectares and is located on the northern side of Burroway Road and to the east of the Olympic Park Ferry Terminal on Wentworth Point.

I provided Site Audit Statement No. NSW-0804-020, dated 17 June 2015, in support of an application for redevelopment of the site to provide a primary school and associated playing fields. In this Statement, I concluded that:

- the nature and extent of the contamination has been appropriately determined; and
- the contamination assessment is appropriate for future use of the site as a primary school; and
- the site can be made suitable for use as a primary school;

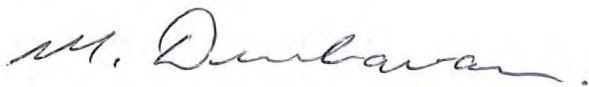
subject to conditions listed in the Statement (copy attached).

Development concept plans for the proposed primary school, dated 2 December 2014, were included in Appendix A of the Site Audit Report associated with the Statement (report reference ENAURHOD01055AA-R01, dated 17 June 2015). I was made aware by Government Architect's Office on 9 July 2015 that these plans had been revised and that current plans were issued on 8 July 2015. I was provided with a copy of the revised development concept plans for consideration regarding any need to revise the Site Audit Statement.

I carefully compared the two sets of plans and identified no difference that was material to the nature or extent or conclusions of the contamination assessment completed by EIS. Consequently, I consider that this revision of development concept plans does not warrant any change to Site Audit Statement No. NSW-0804-020 and confirm that this Statement is applicable to development concept plans for the proposed primary school issued 8 July 2015.

If you require clarification of any part of this letter, please contact me.

For and on behalf of Coffey

A handwritten signature in dark ink, appearing to read 'M. Dunbavan'.

Michael Dunbavan
NSW EPA Accredited Site Auditor

cc Mitch Delaney, EIS

Attachment: Site Audit Statement No. NSW-0804-020

NSW Site Auditor Scheme SITE AUDIT STATEMENT



A site audit statement summarises the findings of a site audit. For full details of the site auditor's findings, evaluations and conclusions, refer to the associated site audit report.

This form was approved under the Contaminated Land Management Act 1997 on 31st October 2012. For more information about completing this form, go to Part IV.

PART I: Site audit identification

Site audit statement no. NSW-0804-020.....

This site audit is a ~~statutory audit~~ **non-statutory audit*** within the meaning of the *Contaminated Land Management Act 1997*.

Site auditor details (as accredited under the *Contaminated Land Management Act 1997*)

Name Michael Dunbavan..... Company ... Coffey Environments Australia Pty Ltd

Address Level 19, Tower B, 799 Pacific Highway.....

..... Chatswood NSW..... Postcode ... 2067.....

Phone 02 9406 1206..... Fax 02 9406 1002.....

Site details

Address Part of 3 Burroway Road.....

..... Wentworth Point NSW..... Postcode ... 2127...

Property description (*attach a list if several properties are included in the site audit*)

..... Part Lot 2 in DP 859608.....

Local Government Area Auburn City Council.....

Area of site (e.g. hectares) ... 1.460 hectares... Current zoning ... R4 High Density Residential.

To the best of my knowledge, the site ~~is~~ **is not*** the subject of a declaration, order, agreement, proposal or notice under the *Contaminated Land Management Act 1997* or the *Environmentally Hazardous Chemicals Act 1985*.

Declaration/Order/Agreement/Proposal/Notice* no(s)

.....

**Strike out as appropriate*

Site audit commissioned by

Name Michael Mossman Company ... NSW Public Works

Address Government Architect's Office, Level 19, McKell Building

..... 2-24 Rawson Place, Sydney NSW Postcode ... 2000 ...

Phone 02 9372 8396 Fax 02 9372 8399

Name and phone number of contact person (if different from above)

..... as above

Purpose of site audit

☐ A. To determine land use suitability (*please specify intended use[s]*)

.....

OR

☒ B(i) To determine the nature and extent of contamination, and/or

☒ B(ii) To determine the appropriateness of an **investigation/remedial action/management plan***, and/or

☒ B(iii) To determine if the land can be made suitable for a particular use or uses ~~by implementation of a specified remedial action plan/management plan*~~ (*please specify intended use[s]*)

..... Primary School

Information sources for site audit

Consultancy(ies) which conducted the site investigation(s) and/or remediation

..... GHD Pty Ltd (2009 to 2013) and Environmental Investigation Services (2014 and 2015)

Title(s) of report(s) reviewed

- Environmental Investigation Services: Report to NSW Public Works – Government Architects Office on Sampling, Analysis and Quality Plan for Proposed Primary School Development at Part of 3 Burroway Road, Wentworth Point, NSW (Part of Lot 2 in DP859608). Reference E27299Krpt-SAQP, dated 18 August 2014.
- Environmental Investigation Services: Report to NSW Public Works – Government Architects Office on Additional Detailed Environmental Site Assessment for Proposed Primary School Development at Part of 3 Burroway Road, Wentworth Point, NSW (Part of Lot 2 in DP859608). Reference E27299Krpt-SAQP, dated 22 May 2015.

Other information reviewed (including previous site audit reports and statements relating to the site) ...

- GHD: Report for Homebush Bay West Contamination Assessment, Preliminary Site Investigation. Revision 0, dated November 2009 (GHD 2009).
- AECOM Australia Pty Ltd: Geotechnical Assessment, Wentworth Point. Dated 28 November 2012 (AECOM 2012)
- GHD: Additional Contamination Assessment, Homebush Bay West, Stage 1 Area. Revision 2, dated November 2012 (GHD 2012).
- GHD: Report for Roads and Maritime Services, Wentworth Point, Homebush Bay West, Ground Gas Monitoring, Final, dated 22 March 2013 (GHD 2013a).

***Strike out as appropriate**

- GHD: Report for Roads and Maritime Services, Wentworth Point, Homebush Bay West, Ground Gas Monitoring, Rev. No. 1, dated 12 September 2013 (GHD 2013b).
- GHD: Report for Roads and Maritime Services, Wentworth Point, Homebush Bay West, Interim Site Management Plan, Rev. No. 5, dated 12 September 2013 (GHD 2013c).
- GHD: Report for Roads and Maritime Services, Wentworth Point Burroway Road Site, Homebush Bay West, Conceptual Remediation Action Plan, Rev. No. 2, dated 12 September 2013 (GHD 2013d).

Site Audit Statement (No. 0503-0912, Andrew Lau) issued on 9 July 2010 relevant to the Stage 1 and Stage 2 areas on Wentworth Point (associated Site Audit Report was not available).....

.....

Site audit report

Title Site Audit Report for Proposed Primary School, Burroway Road, Wentworth Point NSW

Report no. ...ENAU RHOD01055AA-R01.. Date 17 June 2015.....

PART II: Auditor's findings

Please complete either Section A or Section B, **not** both. (*Strike out the irrelevant section.*)

Use Section A where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land use(s).

Use Section B where the audit is to determine the nature and extent of contamination and/or the appropriateness of an investigation or remedial action or management plan and/or whether the site can be made suitable for a specified land use or uses subject to the successful implementation of a remedial action or management plan.

Section A

☐ I certify that, in my opinion, the site is **SUITABLE** for the following use(s) (*tick all appropriate uses and strike out those not applicable*):

- ☐ Residential, including substantial vegetable garden and poultry
- ☐ Residential, including substantial vegetable garden, excluding poultry
- ☐ Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry
- ☐ Day care centre, preschool, primary school
- ☐ Residential with minimal opportunity for soil access, including units
- ☐ Secondary school
- ☐ Park, recreational open space, playing field
- ☐ Commercial/industrial
- ☐ Other (*please specify*)

subject to compliance with the following environmental management plan
(*insert title, date and author of plan*) **in light of contamination remaining on the site:**

.....
.....
.....

OR

☐ I certify that, in my opinion, the site is **NOT SUITABLE** for any use due to the risk of harm from contamination.

Overall comments

.....
.....
.....
.....

Section B

Purpose of the plan¹ which is the subject of the audit ... The purpose of this audit is to provide an independent expert opinion regarding contamination in the context of redevelopment of the site to provide a primary school and associated playing fields.

.....

I certify that, in my opinion:

☒ **the nature and extent of the contamination HAS/~~HAS NOT~~ been appropriately determined**

AND/OR

☒ **the investigation/remedial action plan/management plan* IS/~~IS NOT~~ appropriate for the purpose stated above**

AND/OR

☒ **the site CAN BE MADE SUITABLE for the following uses** (*tick all appropriate uses and strike out those not applicable*):

- ☐ ~~Residential, including substantial vegetable garden and poultry~~
 - ☐ ~~Residential, including substantial vegetable garden, excluding poultry~~
 - ☐ ~~Residential with accessible soil, including garden (minimal home-grown produce contributing less than 10% fruit and vegetable intake), excluding poultry~~
 - ☒ ~~Day care centre, preschool, primary school~~
 - ☐ ~~Residential with minimal opportunity for soil access, including units~~
 - ☐ ~~Secondary school~~
 - ☐ ~~Park, recreational open space, playing field~~
 - ☐ ~~Commercial/industrial~~
 - ☐ ~~Other (please specify)~~
-

~~if the site is remediated/managed* in accordance with the following remedial action plan/management plan* (insert title, date and author of plan)~~

subject to compliance with the following condition(s):

1. The primary school approved for construction is consistent with the concept design which includes raising site surface levels by at least 0.5m through placement of construction fill, support of main school buildings on piled foundations and design and installation of gas protection measures as part of school buildings.
2. A Construction Environment Management Plan (CEMP) must be prepared and implemented prior to demolition. An Asbestos Management Plan (AMP) and an Unexpected Finds Procedure must be incorporated into the CEMP.
3. The stockpile of waste soil identified by EIS samples SP01, SP02 and SP03 must be disposed off-site to an appropriately licensed landfill.
4. Imported fill material used to raise the surface level across the site must be validated as consistent with future use of the site as a primary school.

¹ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

5. Potential exposure pathways require on-going control and must be subject to a long-term Environmental Management Plan.
6. Prior to occupation of the Primary School, a Site Audit Statement must be issued regarding the suitability of the site for future use as a Primary School.

Overall comments

Thus, I consider that amendment of the remediation strategy to have no specific Remediation Action Plan for the school site is consistent with meeting the objectives of the GHD Conceptual RAP (GHD 2012d) for the Homebush Bay West area.

I consider that GHD's recommendation for placement of a geotextile marker layer "under the capping layer where hard surface is not built" is not warranted for the site, and would be a very costly item for no substantial reduction in health risk. Placement of a marker layer along a buried services corridor may be appropriate for more reliable management of excavated materials during maintenance or new installation

PART III: Auditor's declaration

I am accredited as a site auditor by the NSW Environment Protection Authority under the *Contaminated Land Management Act 1997* (**Accreditation No. ...0804.....**).

I certify that:

- I have completed the site audit free of any conflicts of interest as defined in the *Contaminated Land Management Act 1997*, and
- with due regard to relevant laws and guidelines, I have examined and am familiar with the reports and information referred to in Part I of this site audit, and
- on the basis of inquiries I have made of those individuals immediately responsible for making those reports and obtaining the information referred to in this statement, those reports and that information are, to the best of my knowledge, true, accurate and complete, and
- this statement is, to the best of my knowledge, true, accurate and complete.

I am aware that there are penalties under the *Contaminated Land Management Act 1997* for wilfully making false or misleading statements.

Signed  Date 17/6/2015.....

Michael Dunbavan

PART IV: Explanatory notes

To be complete, a site audit statement form must be issued with all four parts.

How to complete this form

Part I identifies the auditor, the site, the purpose of the audit and the information used by the auditor in making the site audit findings.

Part II contains the auditor's opinion of the suitability of the site for specified uses or of the appropriateness of an investigation, or remedial action or management plan which may enable a particular use. It sets out succinct and definitive information to assist decision-making about the use(s) of the site or a plan or proposal to manage or remediate the site.

The auditor is to complete either Section A or Section B of Part II, **not** both.

In **Section A** the auditor may conclude that the land is *suitable* for a specified use(s) OR *not suitable* for any beneficial use due to the risk of harm from contamination.

By certifying that the site is *suitable*, an auditor declares that, at the time of completion of the site audit, no further remediation or investigation of the site was needed to render the site fit for the specified use(s). Any **condition** imposed should be limited to implementation of an environmental management plan to help ensure the site remains safe for the specified use(s). The plan should be legally enforceable; for example a requirement of a notice under the *Contaminated Land Management Act 1997* (CLM Act) or a development consent condition issued by a planning authority. There should also be appropriate public notification of the plan, e.g. on a certificate issued under s.149 of the *Environmental Planning and Assessment Act 1979*.

Auditors may also include **comments** which are key observations in light of the audit which are not directly related to the suitability of the site for the use(s). These observations may cover aspects relating to the broader environmental context to aid decision-making in relation to the site.

In **Section B** the auditor draws conclusions on the nature and extent of contamination, and/or suitability of plans relating to the investigation, remediation or management of the land, and/or whether land can be made suitable for a particular land use or uses upon implementation of a remedial action or management plan.

By certifying that a site *can be made suitable* for a use or uses if remediated or managed in accordance with a specified plan, the auditor declares that, at the time the audit was completed, there was sufficient information satisfying guidelines made or approved under the CLM Act to determine that implementation of the plan was feasible and would enable the specified use(s) of the site in the future.

For a site that *can be made suitable*, any **conditions** specified by the auditor in Section B should be limited to minor modifications or additions to the specified plan. However, if the auditor considers that further audits of the site (e.g. to validate remediation) are required, the auditor must note this as a condition in the site audit statement.

Auditors may also include **comments** which are observations in light of the audit which provide a more complete understanding of the environmental context to aid decision-making in relation to the site.

In **Part III** the auditor certifies his/her standing as an accredited auditor under the CLM Act and makes other relevant declarations.

Where to send completed forms

In addition to furnishing a copy of the audit statement to the person(s) who commissioned the site audit, statutory site audit statements must be sent to:

EPA (NSW)

Contaminated Sites Section
PO Box A290, SYDNEY SOUTH NSW 1232
nswauditors@epa.nsw.gov.au

AND

the **local council** for the land which is the subject of the audit.