

22 September 2020  
Ref: E31040Blet-ARAP-rev1

Canterbury South Public School  
c/- NBR Architecture

Attention: Macella Salzmann  
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**ADDENDUM TO REMEDIATION ACTION PLAN (ARAP)  
DEFERMENT NOTICE FROM THE PLANNING PANEL  
PROPOSED ADDITIONS TO CANTERBURY SOUTH PUBLIC SCHOOL  
OFF HIGH STREET, CANTERBURY, NSW**

## **1 INTRODUCTION**

Environmental Investigation Services (EIS, now JK Environments Pty Ltd, JKE) were commissioned to prepare a Remediation Action Plan (RAP) (Ref: E31040KBrpt-RAP, dated 17 September 2020) for the proposed additions to Canterbury Public School, off High Street, Canterbury, NSW.

This letter forms an addendum to the RAP (ARAP) and should be read in conjunction with the EIS RAP. This letter has been prepared in response to the Deferment Notice from the Planning Panel.

EIS (now JKE) has previously undertaken a hazardous building materials assessment, Stages 1 and 2 Environmental Site Assessment (ESA) between 2017 and 2018 for the proposed development at the site. A RAP was subsequently prepared in 2018. The previous investigations identified contamination issues at the site which require remediation as outlined in the RAP.

## **2 CLARIFICATIONS TO RAP**

### **2.1 Remediation Strategy**

The EIS RAP identified soil contamination at the site which requires remediation. Considering the proposed development details; NEPM 2013 hierarchy; and environmentally sustainable practices, the preferred methods for remediation will be, cap and containment method (Option 3) of remediation will be implemented until all areas of contained fill across the site are exhausted. Noting this option would include the implementation of a long-term Environmental Management Plan (EMP) for the site for ongoing management of the capping. Any further contaminated excavated material shall be removed from site (Option 4).



JKE understand that School Infrastructure NSW (SINSW) are in acceptance of the above remediation options outlined in the EIS RAP.

## **2.2 RAP Procedures – Validation, Contingency and Site Management**

The EIS RAP outlines the remediation details (Section 7) and provides a validation plan (Section 8) for the site. The EIS RAP also includes a contingency plan (Section 9) and site management plan for remediation works (Section 10). The RAP adequately covers the procedures required for site remediation, validation, contingency and site management. The above approach is consistent with the requirements of State Environmental Planning Policy No.55 – Remediation of Land (1998); National Environmental Protection (Assessment of Site Contamination) Measure 1999 as amended (2013), other guidelines made under or with regards to the Contaminated Land Management Act (1997).

## **2.3 Acid Sulfate Soil (ASS) Risk**

A review of the ASS risk maps undertaken for the EIS Stage 1 2017 ESA indicated that the site is located within a Class 5 ASS risk area. Works in Class 5 area that could pose an environmental risk in terms of ASS include works within 500m of adjacent Class 1,2,3,4 land which are likely to lower the water table below 1m AHD on the adjacent land.

We have assessed the risk posed to the environment by disturbance of ASS during the development as relatively low for the following reasons:

- The ASS risk map prepared by the Department of Land and Water Conservation indicates that the site is located within an area of no known occurrence of ASS;
- The boreholes drilled for the EIS Stage 2 ESA indicate the site is underlain by a residual soil profile over sandstone bedrock. ASS are not usually associated with residual soil profiles; and
- The site is located at approximately 11-26m AHD. ASS are not usually associated with soil horizons above 5m AHD.

Considering the information reviewed and the above points, an ASS management plan (ASSMP) is not considered necessary for the proposed development.

## **3 LIMITATIONS**

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If you have any questions concerning the contents of this letter please do not hesitate to contact us.

Kind Regards

A handwritten signature in black ink, appearing to be 'VB' with a stylized flourish.

Vittal Boggaram  
Principal Associate