

From: Lindsay McGavin <LMcGavin@tweed.nsw.gov.au>
Sent: Wednesday, 14 August 2019 8:45 AM
To: Rebecca Carpenter <Rebecca.Carpenter@planning.nsw.gov.au>
Subject: SCC 49 Elouera Terravce, Bray PArk

Hi Rebecca,

Please see below additional comments regarding the site compatibility certificate.

Thanks

Lindsay

Contaminated Land Assessment

The following is noted from Council records:

GIS – 800m to the Oconnors Dip.

GIS – Adjacent lot 21 DP1170438 is indicated within the potential contaminated land layer (power station). This aspect has not been addressed in the Contamination Report.

GIS – The lots are not noted in the coastal quaternary Geology layer.

GIS Topo – Nil indicated.

GIS aerials – 1962, 1970 & 1987 – broad acre farming / cropping

ECM File S18L/644 - 1982 subdivision – makes mention of sugar cane operations.

ECM File PF1860/310 – Nil identified.

ECM general PN 107697 – Nil identified.

A Stage 1 Preliminary Assessment Proposed Residential Subdivision and Seniors Living, Environmental Engineering Solutions, May 2019 has been submitted. The report is not considered suitable for the following reasons:

- The number of soil samples taken does not comply with Table A Minimum Sampling Points Required (72 v 42), *NSW EPA Sample Design Guidelines, Sept. 1995*. Part 1.2 of the Guideline indicates this is the 'ABSOLUTE' minimum number required to detect hot spots.
- As the minimum number of samples have not been taken (ie sufficient number to locate hot spots) the exceedance of HIL A at BH8 for lead should not be statistically written off (95% confidence level).
- The Report fails to adequately address the HIL exceedances for total recoverable hydrocarbons (TRH) at BH7A and BH16A. These areas require remediation, and the results suggest the site is actually contaminated. Further, as both individual samples taken for TRH exceeded HIL A levels, further site investigation for TRH hot spots may be required.
- No testing or assessment of sub slab contaminants has been undertaken.
- The Report under Part 4.2 indicates dieldrin contamination in two locations and suggests this material has been removed historically. This issue requires further investigation / validation.
- The report indicates that various chemicals were applied to the land for agricultural purposes. It does not appear to identify or specifically test historical chemical storage areas (individual samples/sheds etc).

- Further investigation into the adjacent land (lot 21 DP1170438) nominated as potentially contaminated in Council's GIS records.

The conclusion of the Report is not supported:

On the basis of the results, and noting the exceptions described above, the subject land is considered suitable from an environmental perspective for the proposed residential and seniors housing development.

In this instance a detailed contaminated land investigation is required and possibly a remediation action plan. Council would likely require a contaminated land auditor review of any future development application.

Lindsay McGavin

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Development Assessment and Compliance



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