



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 12 October 2017.

For information about completing this form, go to Part IV.

Part I: Site audit identification

Site audit statement no. **0503-2108**

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 **Andrew Lau**

Company **JBS&G**

Address **Level 1, 50 Margaret Street**

Sydney **NSW**

Postcode **2000**

Phone **02 8245 0300**

Email **alau@jbsg.com.au**

Site details

Address **215 Badgerys Creek Road**

Bringelly NSW

Postcode **2556**

Property description

(Attach a separate list if several properties are included in the site audit.)

Part Lot 1 in DP 1282949

Local government area **Liverpool**

Area of site (include units, e.g. hectares) **7.7 hectares**

Current zoning **ENZ Environment and Recreation, ENT Enterprise and MU Mixed Use**

Regulation and notification

To the best of my knowledge:

~~the site is~~ the subject of a declaration, order, agreement, proposal or notice under the *Contaminated Land Management Act 1997* or the *Environmentally Hazardous Chemicals Act 1985*, as follows: (provide the no. if applicable)

Declaration no. _____

Order no. _____

Proposal no. _____

Notice no. _____

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

To the best of my knowledge:

~~the site has been notified to the EPA under section 60 of the *Contaminated Land Management Act 1997*~~

the site **has not** been notified to the EPA under section 60 of the *Contaminated Land Management Act 1997*.

Site audit commissioned by

Name **Paul Hedge**

Company **Western Parkland City Authority**

Address **Level 2, 10 Valentine Avenue**

Parramatta NSW

Postcode **2150**

Phone **0413 587 340**

Email Paul.Hedge@wpcasdney

Contact details for contact person (if different from above)

Name **As Above**

Phone

Email

Nature of statutory requirements (not applicable for non-statutory audits)

~~Requirements under the *Contaminated Land Management Act 1997*
(e.g. management order; please specify, including date of issue)~~

~~Requirements imposed by an environmental planning instrument
(please specify, including date of issue)~~

~~Development consent requirements under the *Environmental Planning and Assessment Act 1979* (please specify consent authority and date of issue)~~

~~Requirements under other legislation (please specify, including date of issue)~~

Purpose of site audit

A1 To determine land use suitability

Intended uses of the land:

- Commercial/industrial
- Mixed use – including residential with minimal access to soil and child care facilities
- Open space

OR

~~**A2** To determine land use suitability subject to compliance with either an active or passive environmental management plan~~

~~Intended uses of the land: _____~~

OR

(Tick all that apply)

~~**B1** To determine the nature and extent of contamination~~

~~**B2** To determine the appropriateness of:~~

- ~~an investigation plan~~
- ~~a remediation plan~~
- ~~a management plan~~

~~**B3** To determine the appropriateness of a **site testing plan** to determine if groundwater is safe and suitable for its intended use as required by the *Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017*~~

~~**B4** To determine the compliance with an approved:~~

- ~~**voluntary management proposal** or~~
- ~~**management order** under the *Contaminated Land Management Act 1997*~~

~~**B5** To determine if the land can be made suitable for a particular use (or uses) if the site is remediated or managed in accordance with a specified plan.~~

~~Intended uses of the land: _____~~

Information sources for site audit

Consultancies which conducted the site investigations and/or remediation:

Environmental Resources Management Australia Pty Ltd (ERM)

Titles of reports reviewed:

- *Aerotropolis Core Precinct, Review of Contamination Issues*. 17th June 2021, Rev 3, Final (Environmental Resources Management Australia Pty Ltd, 2021b);
- *Aerotropolis Core Precinct – Priority Area 1, Sampling and Analysis Quality Plan*. 6 July 2021, Rev 2, Final (Environmental Resources Management Australia Pty Ltd, 2021c); and
- *Detailed Site Investigation, First Building Area Bradfield City Centre, NSW*. 10 June 2022, Rev 4, Final (Environmental Resources Management Australia Pty Ltd, 2022).

Other information reviewed, including previous site audit reports and statements relating to the site:

- *Unexploded Ordnance (UXO) Consultancy Services, RAAF Receiving Station Site Bringelly, NSW*. V1.01, 13 January 2011. G-tek Australia Pty Limited (G-tek 2011)
- *Bringelly RAAF Receiving Station, Infrastructure Assessment Report, April 2011*. Rev no. 2, 8/2/11. GHD Pty Ltd (GHD 2011)
- *RAAF Bringelly Receiving Station, NSW, Heritage Assessment*. 0121954, 18 April 2011. Environmental Resources Management Pty Ltd (ERM 2011)
- *Bringelly RAAF Receiving Station, Bringelly, NSW. Stage 1 Overarching Report – Summary Outcomes of Due Diligence Investigations*. Final Report, August 2011. Sweet (Australia) Pty Ltd (Sweett 2011)
- *Hazardous Building Materials Assessment, Former RAAF Bringelly Receiving Station*. 107623154 018 Rev 0, August 2011. Golder Associates Pty Ltd (Golder 2011a)
- *Detailed Site Investigation, Former RAAF Bringelly Receiving Station*. 107623154 021 R Rev 0, October 2011. Golder Associates Pty Ltd (Golder 2011b)
- *Remedial Action Plan, Former RAAF Bringelly Receiving Station*. 117623154-036-R-Rev3, April 2014. Golder Associates Pty Ltd (Golder 2014)
- *215 Badgerys Creek Road, Bringelly, NSW, Detailed Site Investigation Report*. P19.114-RPT-DSI_0, 13/12/2019. Western Environmental Pty Ltd (Western Environmental 2019)
- *Sydney Metro Greater West Technical Paper 8: Contamination*. Rev 3, June 2020. M2A Pty Ltd (M2A 2020a)
- *Sydney Metro Western Sydney Airport Technical Paper: Non-Aboriginal heritage*. Draft Revision 5, July 2020. Artefact Heritage Services (Artefact Heritage 2020)
- *Sydney Metro – Western Sydney Airport, Technical paper 5: Aboriginal Heritage*. Rev 2, July 2020. M2A Pty Ltd (M2A 2020b)
- *Western Sydney Aerotropolis Constraints and Land Capability Assessment – Stage 1 Report*. September 2020. Aurecon Australasia Pty Ltd (Aurecon 2020)
- *Aerotropolis Core Precinct, Targeted Site Investigation*. Final, 21 May 2021 (Environmental Resources Management Australia Pty Ltd, 2021a).

Site audit report details

Title **Site Audit Report 0503-2108, First Building Area Bradfield City Centre,**

215 Badgerys Creek Road Bringelly NSW

Report no. **60627/145,274 (Rev 0)**

Date **11 July 2022**

Part II: Auditor's findings

Please complete either Section A1, Section A2 or Section B, not more than one section. (Strike out the irrelevant sections.)

- Use **Section A1** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **without the implementation** of an environmental management plan.
- Use **Section A2** where site investigation and/or remediation has been completed and a conclusion can be drawn on the suitability of land uses **with the implementation** of an active or passive environmental management plan.
- Use **Section B** where the audit is to determine:
 - (B1) the nature and extent of contamination, and/or
 - (B2) the appropriateness of an investigation, remediation or management plan¹, and/or
 - (B3) the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or
 - (B4) whether the terms of the approved voluntary management proposal or management order have been complied with, and/or
 - (B5) whether the site can be made suitable for a specified land use (or uses) if the site is remediated or managed in accordance with the implementation of a specified plan.

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

Section A1

I certify that, in my opinion:

The **site is 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):~~
-

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:

- The site investigation works (ERM 2021b and ERM 2022) are considered to have met the requirements of the *Contaminated Sites: Guidelines for the NSW Site Auditor Scheme* (3rd Edition) (EPA 2017).
- The soil investigations identified isolated elevated concentrations of heavy metals above the adopted EILs in shallow fill or natural material which are considered representative of natural background conditions.
- Similarly, concentrations of heavy metals exceeding the adopted GILs detected in groundwater samples are not considered to be indicative of anthropogenic impacts and do not require further assessment.
- Concentrations of contaminants of potential concern have not been identified at levels to indicate impacts in sediments. The lack of surface water in drainage lines within the site indicates that there is low risk of migration of contaminants of potential concern.
- While ACM was not identified in conduits or in fill material surrounding service lines during the investigation works, development of a Construction Environmental Management Plan including an unexpected finds protocol shall be required to manage any potential unexpected finds in fill materials including potential asbestos conduits that may be encountered during earthworks within the site.

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- Consideration of aesthetic issues including staining, odours, anthropogenic contaminants and presence of asbestos has been adequately addressed in the assessment of soils at the site.
- Assessment of contaminant source pathway receptor linkages has not identified any complete or potentially complete linkages for human health or ecological receptors.
- Based on the information provided, the site is considered suitable for the proposed land use (i.e. commercial/industrial, mixed use – including residential with minimal access to soil and child care facilities, and open space) as defined in NEPC 2013.

Section A2

~~I certify that, in my opinion:~~

~~Subject to compliance with the **attached** environmental management plan² (EMP), the site is 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):~~
-

~~EMP details~~

~~Title~~

~~Author~~

~~Date~~

~~No. of pages~~

~~EMP summary~~

~~This EMP (attached) is required to be implemented to address residual contamination on the site.~~

~~The EMP: (Tick appropriate box and strike out the other option.)~~

- ~~requires operation and/or maintenance of **active** control systems³~~
- ~~requires maintenance of **passive** control systems only³.~~

² Refer to Part IV for an explanation of an environmental management plan.

³ Refer to Part IV for definitions of active and passive control systems.

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Purpose of the EMP:

Description of the nature of the residual contamination:

Summary of the actions required by the EMP:

How the EMP can reasonably be made to be legally enforceable:

How there will be appropriate public notification:

Overall comments:

Section B

Purpose of the plan⁴ which is the subject of this audit:

I certify that, in my opinion:

(B1)

- ~~The nature and extent of the contamination **has** been appropriately determined~~
- ~~The nature and extent of the contamination **has not** been appropriately determined~~

AND/OR (B2)

- ~~The investigation, remediation or management plan **is** appropriate for the purpose stated above~~
- ~~The investigation, remediation or management plan **is not** appropriate for the purpose stated above~~

AND/OR (B3)

- ~~The site testing plan:
 - ~~is~~ appropriate to determine
 - ~~is not~~ appropriate to determineif groundwater is safe and suitable for its intended use as required by the *Temporary Water Restrictions Order for the Botany Sands Groundwater Resource 2017*~~

AND/OR (B4)

- ~~The terms of the approved voluntary management proposal* or management order** (strike out as appropriate):
 - ~~have~~ been complied with
 - ~~have not~~ been complied with.~~

*voluntary management proposal no. _____

**management order no. _____

AND/OR (B5)

- ~~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~~~~

⁴ For simplicity, this statement uses the term 'plan' to refer to both plans and reports.

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- 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 plan (attached):

*Strike out as appropriate

Plan title	
Plan author	
Plan date	No. of pages

SUBJECT to compliance with the following condition(s):

Overall comments:

Part III: Auditor's declaration

I am accredited as a site auditor by the NSW Environment Protection Authority (EPA) under the *Contaminated Land Management Act 1997*.

Accreditation no. **0503**

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 11 July 2022

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

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

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

The auditor is to complete either Section A1 or Section A2 or Section B of Part II, **not** more than one section.

Section A1

In Section A1 the auditor may conclude that the land is *suitable* for a specified use or uses 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 investigation or remediation or management of the site was needed to render the site fit for the specified use(s). **Conditions must not be** imposed on a Section A1 site audit statement. Auditors may 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.

Section A2

In Section A2 the auditor may conclude that the land is *suitable* for a specified use(s) subject to a condition for implementation of an environmental management plan (EMP).

Environmental management plan

Within the context of contaminated sites management, an EMP (sometimes also called a 'site management plan') means a plan which addresses the integration of environmental mitigation and monitoring measures for soil, groundwater and/or hazardous ground gases throughout an existing or proposed land use. An EMP succinctly describes the nature and location of contamination remaining on site and states what the objectives of the plan are, how contaminants will be managed, who will be responsible for the plan's implementation and over what time frame actions specified in the plan will take place.

By certifying that the site is suitable subject to implementation of an EMP, an auditor declares that, at the time of completion of the site audit, there was sufficient information satisfying guidelines made or approved under the *Contaminated Land Management Act 1997*

(CLM Act) to determine that implementation of the EMP was feasible and would enable the specified use(s) of the site and no further investigation or remediation of the site was needed to render the site fit for the specified use(s).

Implementation of an EMP is required to ensure the site remains suitable for the specified use(s). The plan should be legally enforceable: for example, a requirement of a notice under the 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*.

Active or passive control systems

Auditors must specify whether the EMP requires operation and/or maintenance of active control systems or requires maintenance of passive control systems only. Active management systems usually incorporate mechanical components and/or require monitoring and, because of this, regular maintenance and inspection are necessary. Most active management systems are applied at sites where if the systems are not implemented an unacceptable risk may occur. Passive management systems usually require minimal management and maintenance and do not usually incorporate mechanical components.

Auditor's comments

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.

Section B

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 the appropriateness of a site testing plan in accordance with the *Temporary Water Restrictions Order for the Botany Sands Groundwater Source 2017*, and/or whether the terms of an approved voluntary management proposal or management order made under the CLM Act have been complied with, and/or whether the site can be made suitable for a specified land use or uses if the site is remediated or managed in accordance with the implementation of a specified 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. The condition must not specify an individual auditor, only that further audits are required.

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.

Part III

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

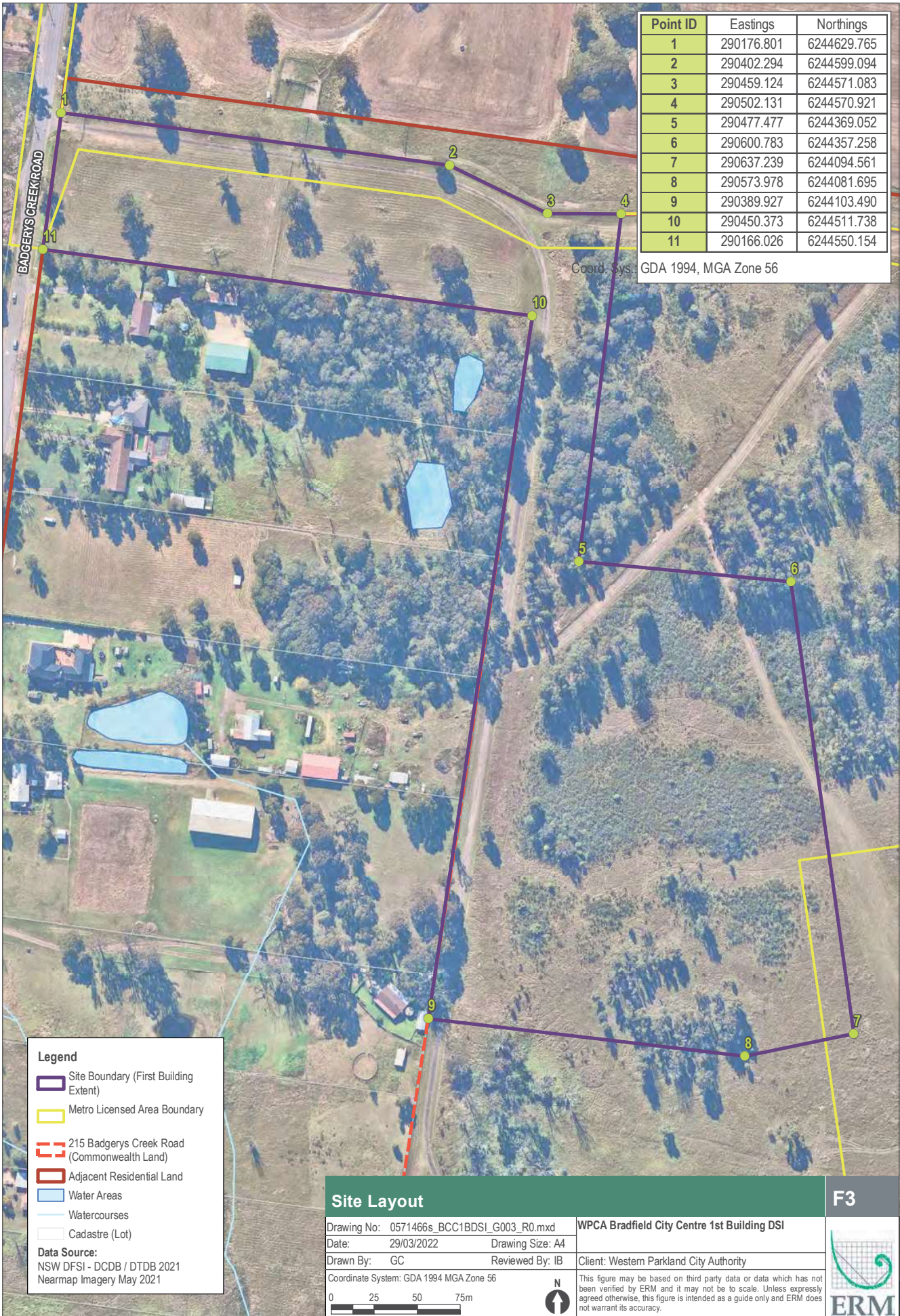
Where to send completed forms

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

- the **NSW Environment Protection Authority**:
nswauditors@epa.nsw.gov.au or as specified by the EPA

AND

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



Point ID	Eastings	Northings
1	290176.801	6244629.765
2	290402.294	6244599.094
3	290459.124	6244571.083
4	290502.131	6244570.921
5	290477.477	6244369.052
6	290600.783	6244357.258
7	290637.239	6244094.561
8	290573.978	6244081.695
9	290389.927	6244103.490
10	290450.373	6244511.738
11	290166.026	6244550.154

Coord. Sys. GDA 1994, MGA Zone 56

Legend

- Site Boundary (First Building Extent)
- Metro Licensed Area Boundary
- 215 Badgerys Creek Road (Commonwealth Land)
- Adjacent Residential Land
- Water Areas
- Watercourses
- Cadastre (Lot)

Data Source:
NSW DFSI - DCDB / DTDB 2021
Nearmap Imagery May 2021

Site Layout

Drawing No: 0571466s_BCC1BDSI_G003_R0.mxd		F3
Date: 29/03/2022	Drawing Size: A4	
Drawn By: GC	Reviewed By: IB	Client: Western Parkland City Authority
Coordinate System: GDA 1994 MGA Zone 56		
<p>This figure may be based on third party data or data which has not been verified by ERM and it may not be to scale. Unless expressly agreed otherwise, this figure is intended as a guide only and ERM does not warrant its accuracy.</p>		

