

Mr Rodger Roppolo
Department of Planning and Environment
PO Box 32
PARRAMATTA NSW 2150

16 February 2023

Dear Mr Roppolo,

RE: Notice of Exhibition – Open Water Surf Facility – Modification 2 (SSD-7942-MOD 2)

Thank you for referring the above MOD application to Sydney Olympic Park Authority (SOPA). SOPA have reviewed the documents and have the following comments.

1. Stormwater

The submitted designs mark-up a proposed relocation of the stormwater swale on the northern Hill Road corner of the site. Whilst the documents submitted include a statement from a stormwater engineer that states that the proposed amendments will likely have a negligible impact (if any) on site stormwater runoff quantity and/or quality (when compared with the approved scheme), there is lack of detail on how the proposed relocation of the drainage swale will interface with SOPA's stormwater infrastructure assets. This needs to be resolved before relocation of the stormwater swale can be supported

2. Landscaping

The Statement of Support document notes the proposal includes 'minor ancillary changes to soft landscaping along the Hill Road and carpark ring road boundaries' (s3.1.2). There does not appear to be a landscape plan included with the documents to detail what these 'minor ancillary changes' might be. As this change relates to the interface with SOPA land, the look and feel of the interface needs to be agreed with SOPA. Such landscaping details should be provided and agreed to by SOPA.

3. Remediation Action Plan

In relation to the Remediation Action Plan, the Modification includes reducing the approved capping over asbestos contaminated areas from 300mm plus 200mm top soil to only 300mm in total for the public lawn and landscape areas. It is noted that to mitigate the potential for reduced durability, the alternative design proposes leveling off of the landscape areas to a maximum slope of 1:3. This will increase the durability of the proposed capping. Sandstone blocks are proposed to be strategically used to reduce slope gradients of turf and planted areas. These measures will help to increase durability of the surfaces from erosion.

Despite the above, the key remediation principal for the asbestos waste is based on a cap and contain system and therefore the integrity of the capping is critical in minimising risks. A 300mm capping profile is much shallower than standard capping applications (NSW EPA prescribes 1M of capping above asbestos waste) and while SOPA recognises that the Site Auditor has endorsed the RAP and that a Long-Term Environmental Management Plan will be developed and implemented as a condition of lease, the durability of the events lawn and

landscaped areas may not be sufficient to prevent a breach of the capping which would result in exposure of the public to asbestos waste. The events lawn and landscaped areas will be used by families and children who may dig into turf or landscape areas exposing wastes and planted areas can expose asbestos wastes as trees and shrub grow and bringing asbestos materials to the surface.

SOPA recommends that the proponent give consideration to a deeper capping layer on the area of the events lawn and landscaped areas and / or the use of a more durable solution that will further reduce this risk.

SOPA notes that the post remediation controls for the long-term management of asbestos beneath the capping layers will be prescribed in a Long Term Environmental Management Plan. This plan will need to include regular reporting to ensure procedures are implemented. Given the Long Term Environmental Management Plan will be required to be implemented as a condition of SOPA's lease, SOPA recommends that **Condition E23** be amended to include:

Condition E23: Prior to the issue of an Occupation Certificate, a Long-Term Environmental Monitoring and Management Plan prepared by a suitably qualified and experienced contamination expert shall be submitted to SOPA's Director, Environment and Planning and the EPA for information. The Plan must:

- *be developed in consultation with SOPA.*

Should you require any clarification in relation to this submission, please contact Rupert Luxton on 0400 768 486 or at rupert.luxton@sopa.nsw.gov.au.

Yours sincerely,



Vivienne Albin
Senior Manager, Planning