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Your ref: PS110639

By email
johnw@fultontrotter.com.au

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Public

John Ward
Director
Fulton Trotter Architects
Level 3, 35 Spring Street, Bondi Junction
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Dear John

Samuel Gilbert Public School Redevelopment (SSD 9274) - Response to Submissions

Following completion of the Environmental Impact Statement (EIS) exhibition for the Samuel Gilbert Public School (SSD 9274) to the NSW Government Department of Planning and Environment (DPE), all submissions and Government agency advice have been posted on the DPE major projects website (majorprojects.planning.nsw.gov.au). A letter was issued by NSW EPA to the DPE on 17th December 2019. The following item relating to Contaminated Land was raised in the letter:

“(a) The need for a detailed assessment of potential site contamination, including information about groundwater and a detailed assessment of the footprint and surrounds of existing buildings following their relocation/demolition”

WSP response: - The development area (investigation area) is located on the existing school campus and comprises an area of approximately 0.85 hectares (ha). Table A of the NSW Sampling Design Guidelines 1995 recommends a total of 20 sampling locations for a site of this size. EIS Appendix U comprises of a combined Preliminary and Detailed Site Investigation (DSI) which included the collection of soil samples from 20 accessible locations. The DSI provides information on groundwater records in the immediate surrounds. During the DSI no sources of groundwater contamination were identified that would warrant further investigation of groundwater beneath the site. WSP acknowledge that sampling was not possible beneath the existing building footprint given that the school was operational at the time of the Investigation. An unexpected contamination finds protocol and inspection of soil beneath the building footprint (post demolition) can be included in a Construction Environmental Management Plan (CEMP) prepared by the Proponents appointed Contractor.

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Attachment A of the letter dated 19th December 2019 provided the following recommendations pertaining to contaminated land (Section 2.1): -

Recommendation 1 – *“The proponent be required (prior to commencing any work on the development site) to prepare and implement a procedure for identifying and dealing with unexpected finds of site contamination (including asbestos containing materials, lead-based paint and PCBs) and to include in that procedure details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved”*

WSP response: - A CEMP can be developed for the site detailing an unexpected finds protocol to be implemented should unexpected finds of potential contamination be identified during development and site use. The unexpected finds protocol will detail the persons responsible for implementing the procedure and the roles and responsibilities of personnel involved.

Recommendation 2 - *“The proponent be required to satisfy the requirements of the Protection of the Environment Operations (Waste) Regulation 2014 with particular reference to Part 7 ‘asbestos wastes’*

WSP response – We acknowledge the importance in implementing the requirements for the transport of asbestos containing waste. The CEMP prepared for the site can summarise the relevant requirements for transport of asbestos containing waste in accordance with Part 7 of *Protection of the Environment Operations (Waste) Regulation 2014*.

Recommendation 3 – *“The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the project.*

WSP response – Noted

Recommendation 4 – *“The proponent be required to undertake additional investigation prior to any construction, including the footprint of relocated and demolished structures and underground utilities with the scope of that additional investigation detailed in a sampling and analysis quality plan”*

WSP response – The potential for contamination to be present beneath the building footprint can be managed by an unexpected contamination finds protocol and inspection of soil beneath the building footprint which can be stipulated in a CEMP prepared by the Proponents appointed Contractor.

Recommendation 5 – *“The proponent be required consider the guidance material provided in the National Environment Protection (Assessment of Site Contamination) Measure as well as the following EPA documents when undertaking further site assessment –*

- *Technical Note: Investigation of Service Station Sites, 2014,*
- *NSW EPA Sampling Design Guidelines,*
- *Guidelines for the NSW Site Auditor Scheme (3rd edition) 2017, and*
- *Guidelines for Consultants Reporting on Contaminated Sites, 2011”*

WSP response – Noted.

Recommendation 6 – *“The proponent be required to ensure that the processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55) are followed in assessing the suitability of the land and any remediation required in relation to the proposed use”*

WSP response – The process outlined in SEPP55 has been followed in preparing the sampling approach for the DSI (EIS Appendix U).

Recommendation 7 – *“The proponent be required to ensure that the proposed development does not result in a change of risk in relation to any pre-existing contamination on the site so as to result in significant contamination”*



WSP response – Noted, a CEMP can identify management procedures to be adopted during the development to prevent potential contamination resulting in a change in risk at the site.

Recommendation 8 – *“The proponent be required to notify the EPA should any contamination of the development site be identified which meets the triggers in the Guidelines for the Duty to Report Contamination”*

WSP response – Noted.

Yours sincerely

A handwritten signature in black ink that reads 'Julie Porter.' The signature is written in a cursive, flowing style.

Julie Porter
Principal Environmental Engineer