



DOC20/436109

9 June 2020

Mr William Hodgkinson
Principal Planning Officer
Key Sites and Industry
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Hodgkinson

**Light Horse Interchange Business Hub Eastern Creek (SSD 9667)
EPA comment on Response to Submissions Addendum Report**

I am writing to you in reply to the invitation to the Environment Protection Authority (EPA) to provide comment on the Response to Submissions Addendum Report for above project.

The EPA reviewed the *Response to Submissions Addendum Report for Light Horse Interchange Business Hub*, prepared by Urbis, dated 25.05.20, and the *Remediation Action Plan – Proposed Light Horse Interchange Business Hub*, prepared by Environmental Earth Sciences, dated 07.04.20.

The *Response to Submissions Addendum Report* stated that it will accept the condition regarding engagement of a Site Auditor if the Department of Planning, Industry and Environment determines it is necessary. The EPA recommends that the applicant engage an independent site auditor to ensure contaminated soil and groundwater is appropriately managed (including any unexpected contamination finds or unexploded ordnance finds) and so that there is confidence the site is suitable for the proposed use. The EPA recommends the following conditions be applied in relation to Contamination:

1. The applicant must ensure any site investigations undertaken, and the subsequent report/s, are prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the *Contaminated Land Management Act 1997*. The reports must be prepared by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist contaminated Site Assessment and Management (CPSS CSAM) scheme.
2. The applicant must engage a NSW EPA-accredited **Site Auditor** throughout the duration of works to ensure that any work required in relation to soil or groundwater contamination is appropriately managed.
3. Prior to commencing with the remediation, the applicant must submit to the Planning Secretary, an Interim Audit Advice or a Section B Site Audit Statement that certifies that the **Remediation Action Plan** is appropriate and that the site can be made suitable for the proposed use. In addition:

Phone 131 555
Phone 02 9995 5555
(from outside NSW)

Fax 02 9995 6900
TTY 133 677, then
ask for 131 155

PO Box 668
PARRAMATTA
NSW 2124

4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW
2150 AUSTRALIA

info@epa.nsw.gov.au
www.epa.nsw.gov.au
ABN 43 692 285 758

- (a) The applicant must adhere to the management measures accepted by the Site Auditor.
 - (b) Any variations to the approved Remediation Action Plan must be approved in writing by the Site Auditor.
4. If work is to be completed in stages, the applicant must submit to the Secretary any **Interim Audit Advice/s** issued by the Site Auditor to confirm satisfactory completion of each stage.
5. The applicant must obtain a Section A1 Site Audit Statement – *or* a Section A2 Site Audit Statement accompanied by an Environmental Management Plan – from a NSW EPA-accredited Site Auditor and submit it to the Planning Secretary and relevant Council for information no later than one month before the commencement of operation. Contaminated land must not be used for the purpose approved under the terms of this consent until a **Site Audit Statement** determines the land is suitable for that purpose and any conditions on the Site Audit Statement have been complied with.

Should you require clarification of any of the issues please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au.

Yours sincerely



Benn Treharne
A/Unit Head, Regulatory Operations – Metro South
Environment Protection Authority