



Reference: DOC21/945021

Date: 9 November 2021

Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Attention: Tahlia Alexander – Principle Planning Officer, Infrastructure Assessments

**New High School in Bungendore – SSD-14394209 – NSW Department of Education**

I refer to the Department of Planning, Industry and Environment's (DPIE) referral of State Significant Development SSD-14394209 for the development of a New High School in Bungendore received by the NSW Environment Protection Authority (EPA) on 17 September 2021. I also refer to correspondence from DPIE inviting the EPA to provide additional comment the proposal in light of the elevated lead levels identified by Transport for NSW in the adjoining Rail Corridor.

The EPA has further reviewed the Environmental Impact Statement (EIS) and associated documents and provides detailed comments in relation to the potential for contamination and noise impacts in Appendix A.

Thank you for discussing the matter with the EPA. If you have any questions or wish to discuss the matter further, please contact Claudine Jeffery or myself on (02) 6229 7002 or at [EPA.southopsregional@epa.nsw.gov.au](mailto:EPA.southopsregional@epa.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matthew Rizzuto'.

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## Appendix A

### Contamination

Transport for NSW has identified elevated levels of lead contamination in the soil in the area of Rail Line and Corridor that passes through the Bungendore Township. As such, due to the proximity of the Rail Line and Corridor to the proposal site, consideration should be given to the potential for lead contamination in areas adjacent to the Rail Line and Corridor.

The EPA notes that soil sampling has been undertaken at the proposal site as part of a preliminary site investigation (PSI). The sampling did not identify any contaminants of concern that exceeded the ecological investigative levels (EIL) or health investigative levels (HIL), other than a slight EIL exceedance of nickel, which was attributed to which was likely related to root zones and animal habitation zones. The EPA also notes that limited groundwater investigation was undertaken as part of the PSI.

The EIS identifies that there are several areas across the site, but commonly in the northern area, where topsoil and surface fill was present, potentially used to infill drainage lines. The EPA notes that the northern area of the site is proposed to be used as an agricultural plot which increases the exposure risk to any potential contaminants present. No soil samples were taken in this area as such the potential for contamination has not been appropriately assessed.

The EIS states that based on the results of the PSI, it is considered that the proposal site can be made suitable for the proposed development subject to further investigation and, if required, remediation. Should further investigation identify that remediation of the proposal site is required, the Remedial Action Plan should be developed in accordance with the *Consultants reporting on contaminated land: Contaminated land guidelines (2020)*.

**The EPA recommends that a Construction Environment Management Plan that incorporates an unexpected finds protocol be developed prior to construction commencing and implemented for the length of the construction activities.**

**The EPA also recommends further investigation to identify potential contamination be undertaken within the proposal site, with particular focus given to the agricultural area in the north.**

### Noise and Vibration

The EIS considers potential noise impacts during both the construction and operation phases of the proposal in accordance with the Interim Construction Noise Guidelines and Noise Policy for Industry (2017).

The EIS identifies a predicted impact on nearby sensitive receivers during construction of the proposal. The greatest noise impacts will be at the sensitive receivers located to the north, east and west of the proposal. While construction activities are predicted to exceed the noise management levels, the impacts are expected to be below the highly noise affected level, except for brief periods when the loudest plant will be operating at the northern boundary. The EIS outlines a series of recommended mitigation and measure to minimise noise impacts, including but not limited to:

- The use of non-tonal reversing beepers,
- The development of a complaint handling procedure,
- The use of respite periods during pneumatic/hydraulic hammering (if such activities are required)

**The EPA recommends that the proponent develop a Noise Mitigation and Management Plan prior to commencing construction works to minimise impacts on sensitivities receivers. The EPA recommends that the proponent also consider additional management strategies including community engagement and communication.**

The EPA notes there is a predicted impact on nearby sensitive receivers from the proposal during operation, particularly during outdoor activities. The EIS identifies that the impacts are likely to effect sensitive receivers located to the north of the proposal in the direct line of site to the outdoor areas.

**The EPA recommends that the proponent identify and implement all reasonable and feasible noise mitigation and management measures to minimise noise impacts at sensitive receivers during operations.**