

2/12/2025

Ref: 19611-ER-2-1

Bridge Housing Limited
Level 9 59 Goulburn St
Sydney NSW 2000
Attention: Sam Johnson (sam.johnson@tsariley.au)

Project: SSD 71454960 Modification Design at 195–213 Fitzgerald Avenue and 40–64 Yorktown Parade, Maroubra NSW

1 Introduction

Alliance Geotechnical Pty Ltd (Alliance) was engaged by Bridge Housing Limited (the client), c/o TSA Riley, to provide environmental consulting services (the Services) for 195–213 Fitzgerald Avenue and 40–64 Yorktown Parade, Maroubra NSW (the site).

Alliance understands that:

- The site is the subject of State Significant Development (SSD) consent (ref: 71454960) for redevelopment, comprising
 - demolition of all existing structures; and
 - construction of:
 - affordable housing consisting of five residential flat buildings, each three storeys high, as well as two buildings that are part three and part four storeys.
 - a single level basement car park in the north of the site accessed from Fitzgerald Avenue will also be constructed;
- The client is seeking modifications under Section 4.55 of the Environmental Planning and Assessment Act 1979 (NSW) to the SSD consent regarding condition C21 to be amended to:
 - “Upon completion of the remediation works and prior to the commencement of ~~construction of the Development, but not including demolition~~ *above ground construction works (excluding demolition, basement and substructure works)*, a Site Audit Report and a Site Audit Statement, prepared in accordance with the NSW Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme 2017, which demonstrates the site is suitable for its approved land use, must be submitted to the Planning Secretary for information”,

to meet the operational and management requirements of the client as the developer and the community housing provider for the redevelopment; and
- The client requires an opinion on whether the site can be made suitable for the proposed land use scenario prior to above ground construction (*excluding demolition, basement and substructure works*), to facilitate the Minister for Planning’s decision making on the modification being sought.

2 Objectives

Alliance understands the objective of this project was to provide an opinion on whether the site can be made suitable for the proposed land use scenario prior to above ground construction (*excluding demolition, basement and substructure works*) for the purpose of the redevelopment scheme considered in Alliance (2024)¹.

3 Scope of Work

Alliance undertook the following scope of work to address the project objective:

- a desktop review of:
 - Alliance 2024 'Remedial Action Plan, 195–213 Fitzgerald Avenue and 40–64 Yorktown Parade, Maroubra NSW', dated 18 October 2024, ref: 17716.2-ER-1-2 Rev 2;
 - Ramboll 2024, 'Interim Site Auditor Advice Letter No 1 for Remedial Action Plan, 195–213 Fitzgerald Avenue and 40–64 Yorktown Parade, Maroubra NSW', dated 16 October 2024, ref: 318002077; and
- data assessment and reporting.

4 Desktop Review

4.1 Alliance (2024)

Based on the assessment undertaken of site history information, fieldwork observations and data, and laboratory analytical data, in the context of the proposed land use scenario and objectives of that project, it was concluded that the remediation objective can be achieved and the site made suitable for the proposed land use scenario, subject to the:

- Implementation of the strategies, methodologies, plans and procedures set out in Alliance (2024), if required, following the completion of the supplementary contamination assessment (SCA) set out in Alliance (2024); and
- Preparation of a site remediation and validation report (if required).

4.2 Ramboll (2024)

In Ramboll (2024), the Site Auditor concluded that

- Alliance (2024) provided an adequate framework (the SCA proposed within) for defining the extent of remediation required following removal of site structures and surfacing;
- the proposed remediation strategies of excavation and off-site disposal, or treatment of surface soils for removal of asbestos containing materials (ACM), are appropriate to address potential contamination that may be identified; and

¹ Alliance 2024 'Remedial Action Plan, 195–213 Fitzgerald Avenue and 40–64 Yorktown Parade, Maroubra NSW', dated 18 October 2024, ref: 17716.2-ER-1-2 Rev 2

- the RAP provides an adequate framework that should be able to ensure that the site is suitable for the proposed land uses if adequately implemented. Successful validation will be required to confirm this.

4.3 Discussion

Alliance has considered the relevant information in Alliance (2024) and Ramboll (2024), and provides the following comments:

- No unacceptable land contamination risks have been identified at the site;
- If plausible unacceptable land contamination risks are present in the footprint of the proposed basement, those risks would be remediated by basement excavation works and offsite disposal of those excavated soils;
- Alliance (2024) includes conceptual methodologies for remediation of plausible unacceptable land contamination risks, should the proposed SCA works identify them; and
- The conceptual remedial methodologies do not rely on above ground structure design (e.g. construction of a membrane to mitigate vapour intrusion into a building, or construction of hardstand to act as a 'capping layer' between site users and below ground land contamination).

5 Conclusions and Recommendations

Based on the findings of the desktop review, Alliance makes the following conclusions:

- The site can be made suitable for the proposed land use scenario prior to above ground construction (*excluding demolition, basement and substructure works*), subject to:
 - Implementation of the strategies, methodologies, plans and procedures set out in Alliance (2024), if required, following the completion of the SCA proposed in Alliance (2024); and
 - Preparation of a site remediation and validation report (if required) prior to above ground construction commencing; and

Based on these conclusions, Alliance recommends:

- The Minister for Planning should consider approving the proposed modification to condition C21 in SSD, specifically:
 - “Upon completion of the remediation works and prior to the commencement of ~~construction of the Development, but not including demolition~~ *above ground construction works (excluding demolition, basement and substructure works)*, a Site Audit Report and a Site Audit Statement, prepared in accordance with the NSW Contaminated Land Management - Guidelines for the NSW Site Auditor Scheme 2017, which demonstrates the site is suitable for its approved land use, must be submitted to the Planning Secretary for information”.

In the event that the proposed development scheme changes from that which was considered in Alliance (2024), then the opinion in this letter must be reviewed, which may result in a different outcome.

6 Closing

Should you require clarification on the content of this letter, please contact the undersigned.

The advice in this letter must be read in conjunction with the attached 'Important Information About This Report'.

For and on behalf of Alliance Geotechnical Pty Ltd

Sam Willis
Senior Project Scientist

Attachments
Important Information About This Report

Important Information About This Report

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The findings presented in this report are based on specific data and information made available during the course of this project. To the best of Alliance's knowledge, these findings represent a reasonable interpretation of the general condition of the site at the time of report completion.

No warranties are made as to the information provided in this report. All conclusions and recommendations made in this report are of the professional opinions of personnel involved with the project and while normal checking of the accuracy of data has been conducted, any circumstances outside the scope of this report or which are not made known to personnel and which may impact on those opinions is not the responsibility of Alliance.

Logs, figures, and drawings are generated for this report based on individual Alliance consultant interpretations of nominated data, as well as observations made at the time fieldwork was undertaken.

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Should additional information that may impact on the findings of this report be encountered or site conditions change, Alliance reserves the right to review and amend this report.