



Our ref: PS107410-CLM-LTR-ARM RevB

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Libby Ure
Architect
NBRS Architecture
Level 3, 4 Glen Street
Milsons Point NSW 2061

Dear Libby

Review of Armidale High School contamination assessment for SEARs compliance

WSP Australia Pty Ltd (WSP) undertook a soil assessment at Armidale High School located on Butler Street, Armidale, NSW 2350 (the site). The assessment, reported in *Targeted soil contamination assessment, Armidale High School, Butler St, Armidale, NSW 2350* (WSP, 2018), was undertaken to determine the soil contamination condition in areas of the site where redevelopment has been proposed. A plan showing the site layout and sampling locations is included in Attachment A.

Subsequent to the completion of the assessment, WSP was provided with the Secretary's Environmental Assessment Requirements (SEARs) for redevelopment work, application number SSD 9095, which inform the environmental impact statement (EIS) being prepared as part of the development consent process. The SEARs are included in Attachment B. WSP has prepared this letter to comment on whether the assessment report fulfils the SEARs with respect to contaminated land.

1. CONTAMINATED LAND REQUIREMENTS

The SEARs for the project includes the following requirement for contamination:

15. Contamination

Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with [*State Environmental Planning Policy No 55 – Remediation of Land* (SEPP 55)].

SEPP 55 requires a consent authority to consider whether a site is contaminated and, if so, whether the site is or can be made suitable for the proposed use prior to granting consent for development (SEPP 55, clause 7).

2. REVIEW OF CONTAMINATION ASSESSMENT

The soil assessment (WSP, 2018) was scoped and undertaken with the objective of assessing the condition soil that will be disturbed by the redevelopment of the site. Based on this purpose, the majority of sampling locations were targeted to the footprints of proposed buildings and playing fields where subsurface work will occur. Within those footprints, some locations were targeted to potentially

Level 27, 680 George Street
Sydney NSW 2000
GPO Box 5394
Sydney NSW 2001

Tel: +61 2 9272 5100
Fax: +61 2 9272 5101
www.wsp.com

contaminated areas such as adjacent to buildings with external hazardous materials such as asbestos-containing cladding.

One location was not undertaken to target proposed construction areas but was located where previous sampling identified polycyclic aromatic hydrocarbons (PAHs) in soil. The purpose of this location was to confirm the detection of PAHs and determine if any risk was present to the ongoing use of the site.

The scope of the soil assessment was planned to provide preliminary waste classification of soil to be excavated and identify any potential health or environmental risks. WSP has reviewed of the scope with regards to fulfilling the SEARs, with the following findings:

- The sampling design was targeted, rather than systematic, and therefore there is no required sampling density. The footprints of the proposed buildings are approximately 6,000 m² for the main new building area in the centre of the site and 1,000 m² for the gymnasium extension. For a systematic (grid) sampling strategy these areas would equate to 15 and 6 samples, respectively, under the NSW EPA 1995 *Sampling Design Guidelines*. The assessment included 10 samples in the larger footprint area and 5 samples in the smaller footprint area. For a targeted assessment, this is considered appropriate to characterise the potential contamination.
- The potential sources of contamination identified at the site were fill material used to level the site, hazardous materials from the weathering of site structures, surface runoff from car parking areas and use of pesticides to maintain the site. These potential sources are considered to have been suitable assessed by the soil sampling undertaken. The potential for groundwater impact beneath the site, based on the results of soil sampling, is considered to be negligible.
- The findings of the soil sampling showed that asbestos and PAHs were present above the adopted criteria in samples of shallow fill material, indicating that the site requires remediation to make it suitable for ongoing use as a school. The remedial actions recommended were to remove shallow fill in the affected areas, the majority of which will be removed by the redevelopment works. Some PAH-impacted fill material was identified adjacent to a parking area in the south of the site where no redevelopment work is proposed; this soil is recommended to be excavated during the construction work and replaced with clean soil. Following the removal of these impacts, the site will be considered suitable from a contamination perspective.

Based on the review of the report, the requirements of SEPP 55 and the SEARs are considered to be fulfilled. The site can be made suitable for the proposed use with the recommended remedial actions. The remediation required does not require the development of a remedial action plan. It can be managed by inclusion of methodology and controls in the construction environmental management plan, which will be prepared by the contractor for the construction work.

3. CLOSURE

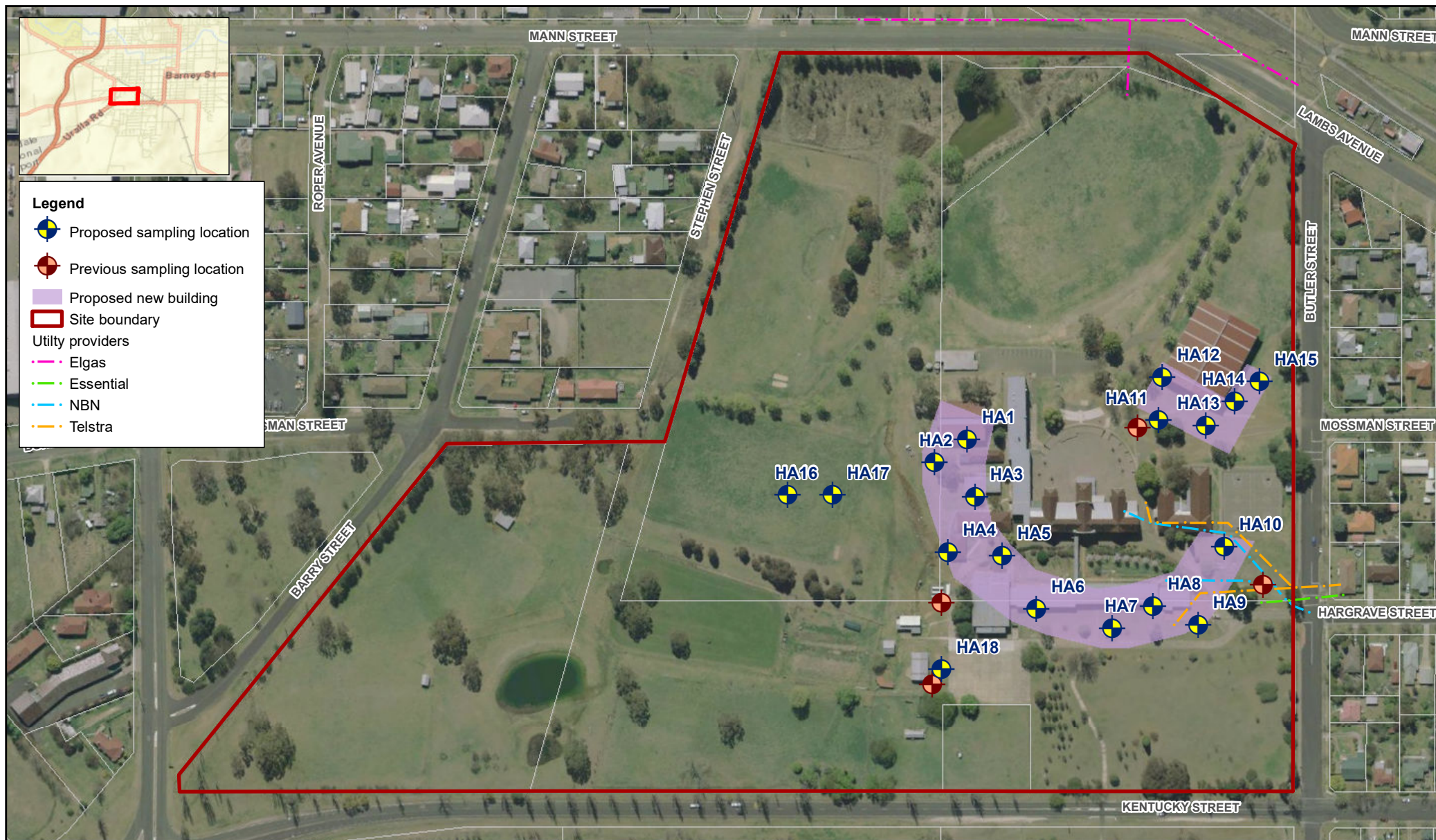
This letter has been prepared as a supplement to the soil assessment (WSP, 2018) and should be read in conjunction with that report and its limitations.

Yours sincerely

Amy Valentine
Principal Environmental Engineer, Contaminated
Land Management

ATTACHMENT A

SITE PLAN



ATTACHMENT B
SECRETARY'S
ENVIRONMENTAL
ASSESSMENT REQUIREMENTS

Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act*
Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 9095
Proposal Name	Armidale High School Redevelopment
Location	Butler Street Armidale
Applicant	School Infrastructure NSW
Date of Issue	Re-issued 27 March 2018
General Requirements	The Environmental Impact Statement (EIS) must be prepared in accordance with, and meet the minimum requirements of clauses 6 and 7 of Schedule 2 the <i>Environmental Planning and Assessment Regulation 2000</i> (the Regulation). Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development. Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include: - adequate baseline data; - consideration of potential cumulative impacts due to other development in the vicinity (completed, underway or proposed); and - measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment. The EIS must be accompanied by a report from a qualified quantity surveyor providing: - a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000) of the proposal, including details of all assumptions and components from which the CIV calculation is derived; - an estimate of the jobs that will be created by the future development during the construction and operational phases of the development; and - certification that the information provided is accurate at the date of preparation.
Key Issues	The EIS must address the following specific matters: 1. Statutory and Strategic Context Address the statutory provisions contained in all relevant environmental planning instruments, including: - State Environmental Planning Policy (State & Regional Development) 2011; - State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017; - State Environmental Planning Policy (Infrastructure) 2007; - State Environmental Planning Policy No.55 – Remediation of Land; - State Environmental Planning Policy No. 64 – Advertising Signage; and - Armidale Dumaresq LEP 2012.

	<i>Permissibility</i> Detail the nature and extent of any prohibitions that apply to the development. <i>Development Standards</i> Identify compliance with the development standards applying to the site and provide justification for any contravention of the development standards. 2. Policies Address the relevant planning provisions, goals and strategic planning objectives in the following: • NSW State Priorities; • draft New England North West Regional Plan; • draft Future Transport Strategy 2056 and supporting plans; • Crime Prevention Through Environmental Design (CPTED) Principles; • Healthy Urban Development Checklist, NSW Health; • Armidale Dumaresq LEP 2012; • New England Development Strategy 2010; and • Armidale Development Control Plan 2012. 3. Operation • Provide details of the existing and proposed school operations, including staff and student numbers, school hours of operation, and operational details of any proposed before/after school care services and/or community use of school facilities; • Provide a detailed justification of suitability of the site to accommodate the proposal; • Provide details of how the school will continue to operate during construction activities of the new primary and secondary school, including proposed mitigation measures. 4. Built Form and Urban Design • Provide detailed site and context analysis, including a building envelope study, to justify the proposed site planning, built form and design approach. • Develop in discussion with the Government Architect NSW a design report that establishes design guidelines and development parameters, and includes diagrams, illustrations and drawings to clarify the design intent of the proposal that clearly demonstrates how design quality will be achieved through future stage(s) in accordance with Schedule 4 Schools – Design Quality Principles of State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017. • Provide a detailed site-wide landscape strategy, including opportunities to retain existing trees on the site. • Detail how services, including but not limited to waste management, loading zones, and mechanical plant are integrated into the design of the development. • Provide a visual impact assessment that identifies any potential impacts on the surrounding built environment. 5. Environmental Amenity • Assess amenity impacts on the surrounding locality, including solar access, acoustic impacts, visual privacy, view loss, overshadowing and wind impacts. • Identify any proposed use of the school outside of school hours (including weekends) and assess any resultant amenity impacts on the immediate locality and proposed mitigation measures.
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- Detailed outline of the nature and extent of the intensification of use associated with the increased floor space, particularly in relation to any proposed increase in staff and student numbers.
- Detail amenity impacts including acoustic impacts. High level of environmental amenity for any surrounding residential land uses must be demonstrated.
- Detail any proposed use of the school grounds out of school hours (including weekends) and any resultant amenity impacts on the immediate locality and proposed mitigation measures.

6. Staging

Provide details regarding the staging of the proposed development.

7. Transport and Accessibility

The EIS shall include a Traffic Transport and Accessibility Impact Assessment, which details, but is not limited to the following:

- accurate details of the current daily and peak hour vehicle, public transport, pedestrian and cycle movement and existing traffic and transport facilities provided on the road network located adjacent to the proposed development;
- an assessment of the operation of existing and future transport networks including the bus network and their ability to accommodate the forecast number of trips to and from the development;
- details of estimated total daily and peak hour trips generated by the proposal, including vehicle, public transport, pedestrian and bicycle trips based on surveys of the existing and similar schools within the local area;
- details of any proposed school bus routes along bus capable roads (i.e. travel lanes of 3.5 metres minimum) and supporting infrastructure (bus stops, bus bays etc);
- the adequacy of public transport, pedestrian and bicycle networks and infrastructure to meet the likely future demand of the proposed development;
- the impact of the proposed development on existing and future public transport infrastructure within the vicinity of the site in consultation with Roads and Maritime Services and Transport for NSW and identify measures to integrate the development with the transport network;
- an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity;
- identification of suitable infrastructure required to ameliorate any impacts on traffic efficiency and to maximise road safety at affected intersections;
- the proposed access arrangements (normal and emergency as well as interim access arrangements during any required upgrade works), including car and bus pick-up/drop-off movements on Butler Street, estimated service vehicle movements, and parking areas for all car user groups (e.g. visitor parking, disabled parking and car share);
- sustainable travel initiatives for staff, students and visitors, particularly for the provision of a Green Travel Plan and wayfinding strategies;
- safe pedestrian and bicycle connections, including pedestrian crossings and refuges and speed control devices and zones;
- include a consideration of the railway pedestrian crossing facility in Lambs Avenue/Mann Street;
- details of any upgrading or road improvement works required to accommodate the proposed development;
- details of travel demand management measures to minimise the impact on general traffic and bus operations and to encourage sustainable travel choices and details programs for implementation, including the preparation of a Green Travel Plan;
- the impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other

	approved developments in the vicinity, and the need/associated funding for upgrading or road improvement works, if required. Traffic modelling is to be undertaken using, but not limited to, SIDRA network modelling for current and future years; • prioritisation of active transport initiatives through provision of walking and cycling infrastructure) e.g segregated paths, bicycle parkin, etc) to and within the site, considering connections and availability of public transport; • proposed number of on-site car parking spaces and corresponding compliance with existing parking codes and justification for the level of car parking provided on-site; • proposed bicycle parking provision, including end of trip facilities, in secure, convenient, accessible areas close to main entries incorporating lighting and passive surveillance; • proposed number of on-site car parking spaces and corresponding compliance with existing parking codes and justification for the level of car parking provided on-site; • details of emergency vehicle access arrangements; • an assessment of road and pedestrian safety adjacent to the proposed development and the details of required road safety measures; • an assessment of cumulative on-street parking impacts of car and bus pick-up/drop-off, staff parking and any other parking demands associated with the development during weekdays and special events; • measures to maintain road and personal safety in line with CPTED principles; • in relation to construction traffic: - o an assessment of road safety at key intersection and locations subject to heavy vehicle construction traffic movements and high pedestrian activity; - o details of construction program detailing the anticipated construction duration and highlighting significant and milestone stages and events during the construction process; - o details of the anticipated daily and peak hour construction vehicle movements to and from the site, so as to not impact current traffic operations on the road network; - o details of access arrangements of construction vehicles, construction workers to and from the site, emergency vehicles and service vehicle; - o details of temporary cycling and pedestrian access during construction; - o details of proposed construction vehicle access arrangements at all stages of construction; and - o traffic and transport impacts during construction, including cumulative impacts associated with other construction activities, and how these impacts will be mitigated for any associated traffic, pedestrian, cyclists, parking and public transport, including the preparation of a draft Construction Traffic Management Plan to demonstrate the proposed management of the impact. → Relevant Policies and Guidelines: • <i>Guide to Traffic Generating Developments (Roads and Maritime Services)</i> • <i>EIS Guidelines – Road and Related Facilities (DoPI)</i> • <i>Cycling Aspects of Austroads Guides</i> • <i>NSW Planning Guidelines for Walking and Cycling</i> • <i>Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development</i> • <i>Standards Australia AS2890.3 (Bicycle Parking Facilities).</i>
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8. Noise and Vibration

Identify and provide a quantitative assessment of the main noise and vibration generating sources during construction and operation, including consideration of any public-address system, school bell and use of any school hall for concerts etc. (both during and outside school hours). Outline measures to minimise and mitigate the potential noise impacts on surrounding occupiers of land.

→ Relevant Policies and Guidelines:

- *Noise Policy for Industry 2017 (EPA);*
- *Interim Construction Noise Guideline (DECC);*
- *Assessing Vibration: A Technical Guideline 2006;*
- *Development Near Rail Corridors and Busy Roads – Interim Guideline (Department of Planning 2008).*

9. Ecologically Sustainable Development (ESD)

- Detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design and ongoing operation phases of the development.
- Include a description of the measures that would be implemented to minimise consumption of resources, water (including water sensitive urban design) and energy.
- Demonstrate that the development has been assessed against a suitably accredited rating scheme to meet industry best practice.

10. Social Impacts

Include an assessment of the social consequences of the schools' relative location.

11. Heritage

The EIS should identify any listed or potential heritage items within the redevelopment area. If any listed or potential heritage items, including archaeological resources, are likely to be affected, a Heritage Impact Statement (HIS) must be prepared in accordance with the guidelines in the NSW Heritage Manual.

12. Aboriginal Cultural Heritage

- Identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development, which may include the need for surface survey and test excavation. The identification of cultural heritage values should be guided by the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (DECCW, 2011) and consultation with the Office of Environment and Heritage regional officers.
- Where Aboriginal cultural heritage values are identified, consultation with Aboriginal people must be undertaken and documented in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW). Detail the significance of cultural heritage values for Aboriginal people who have a cultural association with the land.
- Assess impacts on Aboriginal cultural heritage values and demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented. Please note the Due Diligence assessment process is not appropriate to address the requirements for Aboriginal Cultural Heritage assessment.

	13. Utilities • Prepare an Infrastructure Management Plan in consultation with relevant agencies, detailing information on the existing capacity and any augmentation requirements of the development for the provision of utilities including staging of infrastructure. • Prepare an Integrated Water Management Plan detailing any proposed alternative water supplies, proposed end uses of potable and non-potable water, and water sensitive urban design. 14. Contributions Address Council's Section 94 Contribution Plan and/or details of any Voluntary Planning Agreement, which may be required to be amended because of the proposed development. 15. Contamination Assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable for the proposed use in accordance with SEPP 55. → Relevant Policies and Guidelines: • <i>Managing Land Contamination: Planning Guidelines - SEPP 55 Remediation of Land (DUAP).</i> 16. Construction Hours Identify proposed construction hours and provide details of the instances where it is expected that works will be required to be carried out outside the standard construction hours. 17. Drainage Detail drainage associated with the proposal, including springs, stormwater and drainage infrastructure. → Relevant Policies and Guidelines: • <i>Guidelines for development adjoining land and water managed by DECCW (OEH, 2013).</i> 18. Flooding Assess any flood risk on site (detailing the most recent flood studies for the project area) and consideration of any relevant provisions of the NSW Floodplain Development Manual (2005), including the potential effects of climate change, sea level rise and an increase in rainfall intensity. 19. Waste • Identify, quantify and classify the likely waste streams to be generated during construction and operation and describe the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. • Identify appropriate servicing arrangements (including but not limited to, waste management, loading zones, mechanical plant) for the site. 20. Biodiversity Biodiversity impacts related to the proposal and the preparation of a Biodiversity Assessment are to be addressed in accordance with the requirements of the Biodiversity Conservation Act 2016.
Plans and Documents	The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents. In addition, the EIS must include the following: • Architectural drawings (dimensioned and including RLs);

	• Artist impressions; • Site Survey Plan, showing existing levels, location and height of existing and adjacent structures / buildings and boundaries; • Site Analysis Plan; • Stormwater Concept Plan; • Sediment and Erosion Control Plan; • Shadow Diagrams; • View Analysis / Photomontages; • Landscape Plan (identifying any trees to be removed and trees to be retained or transplanted); • Acoustic Report; • Geotechnical and Structural Report; • Accessibility Report; • Arborist Report; • Salinity Investigation Report (if required); • Acid Sulphate Soils Management Plan (if required); • Waste Management Plan; • Fire Safety Measures Schedule; • Schedule of materials and finishes; • Green Travel Plan; and • Draft Construction Environmental Management Plans and relevant sub plans.
Consultation	During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular, you must consult with: • Armidale Regional Council; • NSW Government Architect; • Transport for NSW (TNSW); and • Roads and Maritime Services (RMS). Consultation with TNSW and RMS should commence as soon as practicable to agree the scope of investigation. The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.
Further consultation after 2 years	If you do not lodge a development application and EIS for the development within two years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.
References	The assessment of the key issues listed above must consider relevant guidelines, policies, and plans as identified.