

17 January 2019

Paul Jerogin
Manager, Remediation & Environmental Services
Lendlease
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Exchange Place, 300 Barangaroo Avenue
Barangaroo, NSW, 2000

Dear Paul,

Re: IAA 1: Site Auditor Update Randwick Campus Redevelopment, Randwick

1. Introduction

Jason Clay (the auditor) of Senversa Pty Ltd (Senversa) has been engaged by Lendlease Building as a NSW Environment Protection Authority (EPA) accredited site auditor to undertake a site audit, as defined by the *Contaminated Land Management Act 1997 (CLM Act)* for a site identified as 'the 'Randwick Campus Redevelopment', located at Eurimbla Avenue, Randwick, NSW 2031.

It is understood that the Randwick Campus redevelopment is likely to be undertaken in two stages and is proposed to include development of a new multi-storey Acute Services Building (SSD9113); and a proposed Stage 2 development site to the north of the Acute Services Building.

2. Background, Regulatory Setting and Purpose of This Letter

2.1 Existing Environmental Reports

Douglas Partners Pty Ltd (Douglas Partners) has been engaged as the environmental consultant for the site, and has produced the following reports in this capacity:

- Douglas Partners (2018a), *Report on Preliminary Site Investigation for Contamination, Randwick Campus Redevelopment, Hospital Road and High, Magill and Botany Streets, Randwick*. Ref: 72505.12, 2 February 2018.
- Douglas Partners (2018b), *Report on Detailed Site Investigation, Randwick Campus Redevelopment, Bound by High, Magill, Hospital and Botany Streets, Randwick*. Ref: 72505.14, 25 August 2018. This is hereafter referred to as 'the DSI'.
- Douglas Partners (2018c), *Remediation Action Plan, Randwick Campus Redevelopment, Bound by HIGH, Magill, Hospital and Botany Streets, Randwick*. Ref: 72505.14, 4 September 2018. This is hereafter referred to as 'the RAP'.



2.2 Council Involvement

Demolition and remediation works for the site were the subject of a Development Application to Randwick City Council (referenced DA/208/2018) in 2018. Development approval was granted with a number of conditions relating to site contamination. Following consultation between Randwick City Council; Lendlease Building; and the auditor, clarification was obtained on some of the conditions. Randwick City Council subsequently confirmed the tasks completed in **Table 1** below would be sufficient to meet the conditions that relate to contamination.

Table 1: Randwick City Council Contamination Pathway

Step	Details	Timing
Step 1 – Building Hazardous Materials Survey	Complete Hazmat Survey of all buildings to be demolished and preparation of Hazardous Material Management Plan to inform demolition works.	Prior to demolition Works
Step 2 – Post Demolition Hazardous Materials Clearance	Site Clearance Certificates provided by Independent Occupational Hygienist after completion of demolition works.	Post demolition works
Step 3 – Data Gap Sampling and Analysis Quality Plan (SAQP)	A SAQP will be prepared to document the sampling program to address data gaps in the initial site investigations. The SAQP will be issued to a NSW accredited site auditor (auditor) for review and preparation of an interim audit advice.	Post demolition works
Step 4 – Data Gap Site Investigation & Preparation of Detailed Site Investigation Report (DSI)	Consultant to complete site investigations and sampling program. The results of this program and past investigation data will be consolidated into a DSI report. This report will assess the site conditions, the type of land development proposed and make conclusions on whether or not the site is suitable for the proposed development and where site remediation is or is not required. The DSI report will be issued to the auditor for review and preparation of an interim audit advice.	Post demolition works and pre-building works
Step 5a – Spoil Management Plan	Should the site be determined to be not contaminated (Step 4) then management of site spoil will be documented in a Spoil Management Plan. All waste spoil to be disposed offsite will be classified and disposed in accordance with the NSW Waste Classification Guidelines.	Post demolition works and pre-building works (CC)

Should remediation be required at the site, the actions detailed in **Table 2** would also be required.

Table 2: Additional Randwick City Council Requirements if Contamination is Identified

Step	Details	Timing
Step 4b – Preparation of Remediation Action Plan (RAP)	Should the site be determined to be contaminated (Step 3) and require remediation then a RAP will be prepared.	Post demolition works and pre-building works (CC)
Step 5 – Section B Site Audit Statement	The RAP will be issued to the auditor for review and preparation of a Section B Site Audit Statement.	Post demolition works and pre-building works (CC)



Step	Details	Timing
Step 6 – Preparation of A Validation Report	A Validation Management Plan will be prepared and issued to the auditor for review and preparation of an interim audit advice (IAA). Remediation works will be supervised by an environmental consultant and all validation activities (sampling, waste classification & disposal etc.) will be completed and a Validation Report prepared.	Post Building Work & Pre Occupation Certificate (OC)
Step 7 – Section A Site Audit Statement	The Validation Report will be issued to the auditor for preparation of a Section A Site Audit Statement. The Section A Site Audit Statement will be included in the Occupation Certification	Post Building Work & Pre Occupation Certificate

2.2 EPA and DPE Involvement

A State Significant Development Application was also submitted (referenced SSD 9133), which is currently being assessed by the Department of Planning and Environment (DPE). During the course of this assessment, DPE sought comment from the EPA, and the EPA subsequently issued a letter on 28 September 2018 (referenced DOC18/621287-02), which included the following pertinent recommendations to DPE regarding the development:

3. *The proponent be required to consult with Safework NSW concerning the handling of any asbestos waste that may be encountered during the course of the project.*
4. *The proponent be required to ensure that following demolition of any existing structures, road pavement and infrastructure, electricity substations/transformers and in ground utilities, further investigation is undertaken of soil and groundwater, including within the footprint and immediate surrounds of those demolished structures, infrastructure, substations/transformers and utilities prior to undertaking any construction.*
5. *The proponent be required to ensure that following excavation a Site Validation Assessment report is prepared to determine pre-construction contamination conditions of the site including any fill material imported to the site.*
6. *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 and validation:*
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.
7. *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.*
8. *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.*
9. *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.*
10. *The proponent be required to engage a site auditor accredited under the Contaminated Land Management Act should additional site investigations reveal further contamination of soil or groundwater –*



(a) to review the adequacy of contamination assessment reports, any remediation action plan and unexpected finds procedure, and

(b) to provide a Section A Site Audit Statement (SAS) and accompanying Site Audit Report (SAR) certifying the suitability of the development site for the proposed use.

In addition, Lendlease Building received the following comment from DPE:

... The Department understands that remediation of the site was approved under a separate development consent issued by Council. As such, to satisfy the provisions of the SEPP 55 the Department requires that a Site Audit Statement - Section B prepared by an EPA accredited site auditor be provided prior to determination of the application, certifying the site can be made suitable for the proposed hospital use.

3. Current Position

The purpose of this IAA is to inform the approval authorities that an EPA accredited site auditor (Jason Clay: auditor number 0801) has been commissioned and that a (currently) non-statutory audit is underway. The auditor is currently reviewing the existing information and will bear this in mind when auditing documents to be produced in future (including any additional sampling/ remedial/ validation plans).

The auditor understands that DPE would like the auditor to produce a Section B Site Audit Statement (SAS) on an Remedial Action Plan prior to approving SSD9113. Further investigation is required to update the current RAP to the level of completeness to support a section B Site Audit Statement. The auditor agrees with the EPA's September 2018 recommendation that a Section A SAS be provided only; this can be a prerequisite of occupancy rather than development consent. In the auditor's opinion the DPE should give consideration to conditioning the provision of a Section A SAS prior to occupancy, rather than requiring a Section B on a Remedial Action Plan prior to development consent. This would have the same eventual effect without causing unnecessary delay to the development.

I am mindful of the EPA's September 2018 recommendations and note that some of them have been met or are in the process of being met. I will ensure that the EPA's recommendations are taken into account and complied with in the future works. If I am, for some reason, disengaged or have issue with the execution of the recommendations, I will inform the EPA and approving authority.

4. Conclusion

The auditor concludes that the site can be made suitable for the proposed hospital use if the processes outlined in **Table 1** and **Table 2** above is followed.



5. Closure

Senversa appreciates the opportunity to provide this update and trust it meets with your needs. If you have any questions, please do not hesitate to contact me.

Yours sincerely,

On behalf of **Senversa Pty Ltd**

Jason Clay

Senior Principal
EPA Accredited Site Auditor 0801

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