

Venues NSW
GPO Box 150
SYDNEY NSW 2001

99553.03.R.001.Rev2
22 October 2021
PMO

Attention: Ms Julie Shires

Dear Sirs

**SSD 9835 Sydney Football Stadium Redevelopment Section 4.55 Modification
Precinct Village and Car Park (MOD 7) – Contamination**

1. Introduction

This letter provides information on contamination on the Precinct Village and Car Park project site off Driver Avenue, Moore Park. The advice has been requested by Venues NSW (VNSW).

VNSW is proposing to introduce a village community space, event plaza and multi-level car park to complement the Sydney Football Stadium (SFS) and adjoining Moore Park and Centennial Parklands. The proposed development will facilitate the permanent closure of the EP2 on-grass parking areas within Moore Park opposite the MP1 car park and enable its use for open space purposes consistent with the Moore Park Masterplan.

The Precinct Village and Car Park is proposed to be located on the land west of the SFS, currently approved under SSD 9835 as the MP1 Car Park. It will extend to Moore Park and Driver Avenue and will adjoin the existing UTS, Rugby Australia and NRL Central buildings, all of which are to be retained and do not form part of the project site. A Location Plan is provided at Figure 1.

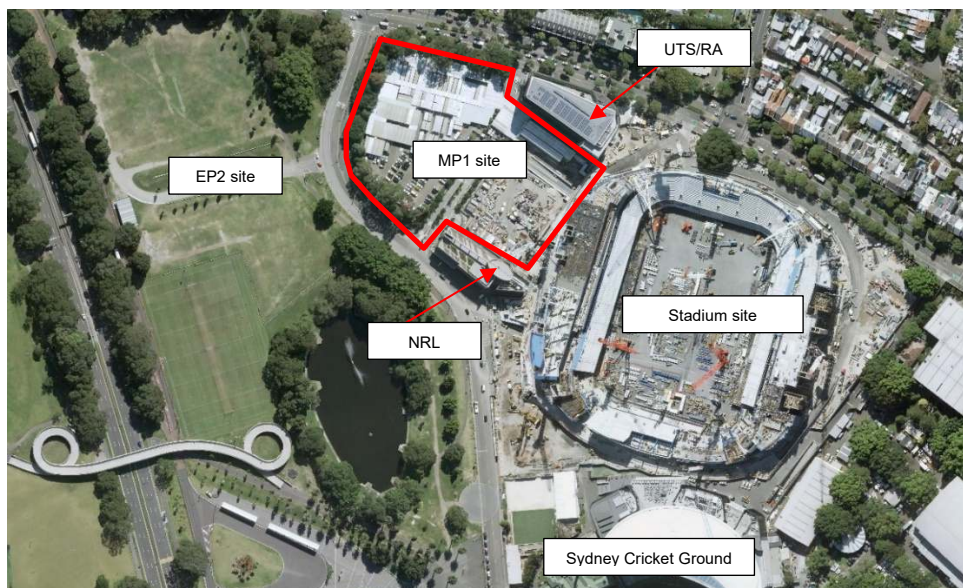


Figure 1: Location Plan

The Precinct Village and Car Park has been designed to align with the conditions and commitment established within SSD 9835, particularly relating to delivering a LEED Gold rated sustainable precinct, and will include:

- Up to a maximum of 1,500 space multilevel carpark below ground level with the following access arrangements:
 - 1 x egress point onto Moore Park Road to be used on event days only;
 - 1 x two-lane access point from Driver Ave to be used on event and non-event days; and
 - dedicated area within the car park for operation/servicing vehicles.
- Reconfiguration of the currently approved drop off requirements for the elderly and mobility impaired.
- Free flow level pedestrian access to and from the SFS concourse from Driver Ave and Moore Park Road.
- Electric car charging provision.
- A versatile and community public domain, comprising:
 - provision for 4 x north-south orientated tennis courts on non-event days with the potential to become an event platform on event days;
 - children's playground;
 - 1,500m² cafe / retail / restaurants with associated amenities in a single storey pavilion (6 metre) low level;
 - customer service office and ticket window; and
 - vertical transport provisions.
- Utilities provision augmentation.

2. Consideration of Contamination

Douglas Partners has been involved with the SFS project which has included contamination assessments, the preparation of a Remediation Action Plan (RAP), waste classification assessments, and site validation. An Unexpected Finds Protocol has also been developed for the site and forms part of the approved Construction Environmental Management Plan. A long-term Environmental Management Plan (EMP) will be prepared at the completion of the SFS project.

The site history on the PV&C site is similar to the SFS site and is described in the Detailed Site Investigation for the SFS project (Ref. 86529.00.R.006B.Rev1 dated 28 May 2019). While this report does not cover the PV&C site specifically, the history of the two sites is similar and the contamination risk profile can also be considered similar. This should provide confidence that the site will be able to be made suitable (if it is not already) for the proposed development.

The types of contamination on the SFS site, which are anticipated to be similar on the Precinct Village and Car Park site, include ash-impacted fill and sporadic inclusions of asbestos-containing material (ACM). From a site suitability and waste disposal perspective, the methodology to manage potential contamination risks with the project include:

1. Detailed Site Investigation to confirm the contamination status of the site and assess whether the procedures in the existing RAP are required to be followed, are sufficient, or whether an amended RAP is required. This would need to be prepared in accordance with SEPP 55 and other related documents (NSW EPA, NEPM etc.) in order to meet standard industry requirements. As the site conditions are expected to be similar to the SFS site, it would be preferable for this work to be mandated as a condition of consent rather than a pre-approval requirement in case aspects of the development which impact contamination considerations change during the planning approval process;
2. Remediation in accordance with the approved RAP, as modified to reflect the findings of the future Detailed Site Investigation and the proposed PV&C works, if remediation is required;
3. Waste classification of all materials to be removed to ensure this work is undertaken lawfully;
4. Validation of the remediation works if such works are required; and
5. Preparation of a long-term Environmental Management Plan (EMP) which will outline management protocols that will need to be followed during the operation of the site, if such management is required.

The PV&C project proposes to introduce public domain and open space, recreational facilities (tennis courts) and retail facilities onto the site, situated on top of an underlying carpark structure. The construction of the project and specifically the underlying carpark will necessitate the removal of existing fill materials from some areas and the capping of the majority of the site with concrete hardstand. Collectively the removal of fill and the introduction of the capping will reduce the potential of exposure and long-term risks to site users. Furthermore, the construction of the proposed public domain and open space on top of the carpark will include the importation of suitable soil to facilitate the proposed landscaping and tree planting. Similarly, the construction of tennis courts and retail uses on top of the carpark roof will limit the exposure of PV&C users to contamination.

The underlying carpark is the only component of the PV&C project that may come into contact with existing contaminated soil and/or groundwater. However, this risk is largely mitigated as the carpark walls will ultimately function as a barrier.

If the contamination risks on this site are similar to those on the SFS site as suggested, then the remediation approach is likely to be to cap and contain the ash and ACM-impacted fill, that does not need to be removed, beneath the finished structure. The proposed carpark structure should be suitable for this purpose.

Assuming remediation is required, SEPP 55 defines the two types of remediation as Category 1 and Category 2. Category 1 remediation requires development consent whereas Category 2 remediation typically does not.

Venues NSW has confirmed that:

- The development is State Significant Development (SSD) not designated development.
- The development is not proposed on land that is critical habitat identified under the Threatened Species Act, 1995.
- There are no threatened species, populations, ecological communities or habitats located on the site.
- The site is not located within an area of environmental significance.
- The Sydney LEP 2021, as the principal LEP, nor any other applicable EPI requires consent for remediation works.

On this basis, the remediation works (if required and assuming they will be similar to the stadium site) are likely to be considered Category 2 works.

It is likely that the excavated fill removed from the site will need to be disposed of to a licenced landfill based on the conditions encountered on the SFS site. This will be able to be undertaken lawfully following appropriate waste classification in accordance with NSW EPA requirements.

Existing conditions D53 and D54 currently provide a framework for ensuring that contamination on the site is appropriately managed. Condition D53 requires a Site Audit Statement signed by a NSW EPA-accredited Site Auditor to be issued certifying that all parts of the site are suitable prior to occupation of the stadium or any of the public domain areas within the site. Condition D54 also provides that the Planning Secretary must provide written confirmation that the requirements of the issued Site Audit Statements have been complied with prior to occupation of the stadium structure or the public domain areas (either in whole or part).

It is noted that a NSW EPA-accredited Site Auditor is involved on the SFS project and is required to prepare a Site Audit Statement confirming that the site is suitable for its intended use – this includes the MP1 carpark site which now forms the PV&C site. This requirement should also provide confidence that future investigations and, if required, remediation and validation, are undertaken in an appropriate manner to ensure the site is suitable for its intended use. This site audit requirement is a condition of the current consent (Conditions D53 and D54) and would have been actioned even without the PV&C project.

The conditions of consent for both the Stage 1 and Stage 2 SSD approvals are not proposed to be modified by the PV&C modification and accordingly will continue to apply to the site.

We trust this information meets your present requirements. Do not hesitate to contact the undersigned if you have any questions.

Yours faithfully,
Douglas Partners Pty Ltd



Peter Oitmaa
Principal