

14124_IA53_SRAP rev4.docx

16 June 2017

Mr Sean Porter
Development Manager Communities
Lend Lease (Maryland Development Company)
Level 2, 88 Phillip Street
PARAMATTA NSW 2150

Via email: sean.porter@lendlease.com
c/-: jamie.clouten@cidsa.com.au

Dear Sean / Jamie,

**Re: Auditor Interim Advice No. 53 – Review of revised Specific Remedial Action Plan (Rev 4),
Central Precinct, Llandilo, NSW**

A. Introduction

Lend Lease (Maryland Development Company) (MDC) appointed Kylie Lloyd of Zoic Environmental Pty Ltd (Zoic), as NSW EPA accredited Contaminated Site Auditor (accreditation 0302) to provide Auditor Services for the property development known as Central Precinct Development, which is proposed to be redeveloped into low density residential land use ensuring that any areas excluded from historical audits have been appropriately assessed and fill imported as part of the development meets the current guidelines.

The purpose of the required Site Auditor Services is to provide a Site Audit Report (SAR) and Site Audit Statement (SAS) with conclusions on the site's suitability for the low density residential land within the Central Precinct Development, following NSW DECC (2006) Contaminated Sites Guidelines for the NSW Site Auditor Scheme (2nd edition).

B. Scope of Audit and Nature of Interim Advice

NSW DEC (2006) describes the site assessment and audit process as:

- (i) *Consultant is commissioned to assess contamination.* The contaminated site consultant designs and undertakes the site assessment and, where required, all remediation and validation activities to achieve the objectives specified by the owner or developer; and
- (ii) *Site auditor reviews the consultant's work.* The site owner or developer commissions the site auditor to review the consultant's work. The auditor prepares a site audit report and a site audit statement at the conclusion of the review, which are given to the owner or developer.

Therefore, the contaminated land consultant and other relevant parties should be satisfied that the work to be conducted conforms to all appropriate regulations, standards and guidelines and is suitable based on the site history and the proposed land use.



C. Background

In 1993 the NSW Government endorsed the release of the 1535 hectare former ADI St Marys property for Urban Development. As the property straddles the boundary between two local government areas (Blacktown and Penrith), the NSW Government decided a regional environmental plan should be prepared to cover the development of the property. State Regional Environmental Plan SREP30 was gazetted and zones the land for a combination of urban, employment, regional open space and regional park land uses. The SREP30 identified six development precincts known as Western Precinct, Central Precinct, North and South Dunheved Precincts, Ropes Creek Precinct and Eastern Precinct.

The former ADI St Marys property was assessed as a number of Sectors. The Central Precinct Development is an approximately 133 hectare area that is being redeveloped for residential land use and associated regional open space and covers North Western Sector, Central Sector West and Southern Sector West. The Central Precinct Development has been the subject of a number of environmental investigations and historical Site Audit Statements by Chris Kidd to confirm suitability for residential land use and is the third residential area to be released within the former ADI St Marys property.

It is noted that a commercial development known as the Dunheved Commercial Area falls within Southern Sector East, that the masterplan is yet to be developed for the Dunheved Commercial Area but that the Dunheved Commercial Area will require filling.

D. Historic Site Audits

Historical Site Audit Statements were completed for the former ADI St Marys Property in 1999 by Mr Chris Kidd to confirm suitability for residential land use. The following Site Audit Statements cover the Central Precinct Development:

- Site Audit Statement (SAS) CHK001/1 – the surrounding development site has been signed off as suitable for residential including substantial vegetable gardens and poultry;
- Site Audit Statement (SAS) CHK001/4 – Site 6 – located within the Regional Park signed off as suitable for residential including substantial vegetable gardens and poultry with some conditions in relation to metallic debris;
- Site Audit Statement (SAS) CHK001/5 – Site 23 – located within the Regional Park signed off as suitable for residential including substantial vegetable gardens and poultry with some conditions in relation to metallic debris;
- Site Audit Statement (SAS) CHK001/6 – existing buildings, paved areas and stockpile footprints signed off as suitable for continued commercial/industrial use; and
- Site Audit Statement (SAS) CHK001/7 – concrete stockpile. Signed off as suitable for continued use as a concrete stockpile only.

Based on the previous Site Audit completed for this area (CHK001/1) the current development site (i.e. land surrounding the previously inaccessible sealed roads, building and stockpile footprints) is considered suitable for the proposed land use and therefore no further investigations, remediation or management are proposed.

Both previous audits (CHK001/6 and CHK001/7) refer to the Development Site and have conditions which have triggered the requirement for the Environmental Site Assessments (ESA) and subsequent remediation/management works.

The majority of ESA works have now been completed in previously inaccessible areas (paved roads, building), with just the stockpile footprints left to investigate. The preparation of the revised SRAP Rev 3 was required to enable the management and remediation of materials that have been moved from the Development Site as they exceed the adopted residential land use criteria. The



SRAP Rev 3 has also been prepared with reference to relevant Australian Standards and guidelines made or approved by the NSW EPA.

The Auditor has previously provided comments on working versions of the SRAP;

- IA 24, dated 15 June 2016 comments on JBS&G draft SRAP June 2016;
- IA25, dated 18 July 2016 provides Auditor endorsement that the SRAP Rev 0, was suitable for implementation of remedial works at the site;
- IA31, dated 17 August 2016. The Auditor provided conditional endorsement that the revised JBS&G SRAP (Rev 2) dated 17 August 2016 was suitable for implementation of remedial works required at the site. The revision of the SRAP was required as the Central Precinct Development was proposed to be assessed against mixed uses (low density residential, as well as commercial / industrial for roadways).
- IA51, dated 14 June 2017 includes comments on JBS&G SRAP Rev3 dated 8 June 2017 to address changes in the remedial strategy to include use of the Dunheved Precinct.

E. Current Interim Advice

In preparing this interim audit advice (IA51), the Auditor has reviewed the following reports related to land contamination assessment:

- JBS&G, revised Specific Remedial Action Plan (SRAP) for Central Precinct, Llandilo NSW, (16 June 2017, ref: R09 50628-104041 Rev 4).

F. Auditor Concurrence

JBS&G provided a revised version of the SRAP (Rev 4) dated 16 June 2017 incorporated all items listed in IA51 identified in Section D above.

As such the Auditor concludes that this revised Specific Remediation Action Plan (Rev 4) dated 16 June 2017, is suitable for implementation of the remainder of the remedial works required within the Central Development Precinct.

G. Closure

This interim audit advice does not constitute a SAS or a SAR, but rather is provided to assist the Client in the assessment and management of contamination issues at the site. The information provided herein should not be considered pre-emptive of the final site audit conclusions. It represents the Auditor's opinion based on the review of currently available Site information.

Should you have any queries or wish to discuss any points, please do not hesitate to contact me.

Yours sincerely,

Kylie Lloyd
Contaminated Site Auditor (NSW EPA Acc. 0302)
Zoic Environmental Pty Ltd