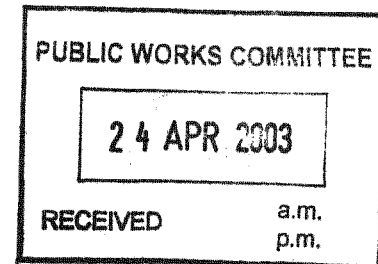


ASSPED 214/2003

The Secretary
Parliamentary Standing Committee on Public Works
Parliament House
CANBERRA ACT 2600



Dear Ms Courto

RANDWICK BARRACKS SITE REMEDIATION AND INFRASTRUCTURE DEVELOPMENT

You referred Submission No 4 from Mr Paul Adam dated 20 March 2003 to Defence for comment.

Mr Adam makes a number of observations and suggests that it may be appropriate for the Committee to determine whether the Defence proposal is the best approach in consideration of the broader public interest. His concerns/observations relate to the following:

1. Whether the proposed remediation works are additional to works already completed;
2. Defence appears to regard the 'best use' of the property as the one that provides the highest short term revenue, rather than the use which is the best long term public benefit. He suggests that consideration should have been given to converting the entire site to public open space rather than it being developed;
3. Remediation of on-site and off-site asbestos contamination and the appropriateness of standards set for this process; and
4. The staged disposal of blocks may lead to the various developers having differing approaches to built form, which may eventually result in an unsatisfactory, 'hodge podge' appearance of development across the disposal site.

DEFENCE RESPONSE

Comment 1

- The works outlined in the Defence submission are separate to the works already progressed. The proposed remediation works for review by the PWC include soil decontamination, vegetation removal (where absolutely necessary for decontamination, construction or services work), earthworks and site re-contouring, demolition of surplus structures and capping of redundant services.

Comment 2

- Defence is complying with the Government's decision to dispose of surplus or inefficiently utilised Defence properties. In keeping with ecologically sustainable development principles and triple bottom line accountability, non-revenue considerations have meant that disposal revenues to the Commonwealth are generally 'optimised' rather than 'maximised'. The revenue from Defence disposals is returned to Consolidated Revenue.

generally

- The planning process for the disposal of the Randwick site involved extensive liaison with state and municipal authorities and community groups (refer para 83 & 84 of Defence Evidence). Their collective requirements dictated the planning and future land use requirements contained in the approved Master Plan for the site (attachment 2 to Defence Evidence). A significant outcome of this consultative process is that approximately 30% of the site will be developed for community use including a community centre and Environmental Park.

Comment 3

- A Site specific Asbestos Management Policy has been developed to manage all asbestos-related issues on Site. This Policy adopts all relevant codes of practice and identifies strict management procedures for the site works including boundary air monitoring.
- A minimum of five air monitors are used during any remediation works and are located close to the work area and on the boundary fences. During the demolition of the asbestos cement clad Naval Stores, air monitoring was undertaken 24 hours a day. The results of the air monitoring are analysed in AirSafe's laboratory – formally accredited by the National Association of Testing Authorities (NATA). In addition to this, personal air samplers were worn by demolition personnel during roof sheet removal works. The results from these personal samplers were analysed in Noel Arnold & Associates' laboratory which is also NATA accredited. All results have been less than the detection limit; indicating no measurable concentrations of asbestos fibres were obtained.
- On-site contamination surveys were undertaken as part of the environmental processes conducted in 2000 under the *Environmental Protection (Impact of Proposals) Act 1974*. The types of contaminants and their locations were identified and documented within the Notice of Intent (NOI) raised as part of this process. The NOI is a public document and was prepared in close consultation with Commonwealth and State environmental authorities.
- All work on the Site is being undertaken in accordance with all relevant Commonwealth and State Acts, Regulations, Codes of Practice and guidelines.
- In the Master Plan for the Site, Council requires remediation to “...*the maximum standard for residential and other sensitive land uses ... where no standard exists the Site is to be remediated to an asbestos free level or to a level where no unacceptable risk remains as confirmed in writing by the relevant State and/or Commonwealth Government Authority*”. Following a review of the Site Audit Report, the NSW Dept of Health has formally advised that “*the risk to people's health, if indeed a risk exists at all, is so small that it need not be considered further*”. This advice was accepted by Council and allowed the residential development of Stage 1A to proceed.
- The assessment of contamination on-site and the management of remediation have been, or are being undertaken by appropriately qualified environmental consultants and occupational hygienists. All testing and reporting is reviewed by an Environment Protection Authority (EPA) accredited Site Auditor prior to the issue of a Site Audit Statement under the *Contaminated Land Management Act* certifying that an area is suitable for its intended use.
- Additionally, the NSW Labor Council, WorkCover and ComCare have reviewed project documentation, remediation processes and works in progress raising no issues which have prevented works from proceeding on-site.
- Contamination, if and when found, is managed in accordance with a site specific management plan, re-assessed and signed-off by the Site Auditor.
- All work is reviewed by an independent environmental consultant appointed by the NSW Labor Council. An Environmental/Community Liaison Officer also reports to Council.

- The remaining ground water contamination on the Site has occurred due to a leaking sewer main that is to be replaced during the provision of trunk infrastructure across the Site. The contaminant has been unequivocally identified as dry cleaning fluid from a source to the north of the Site and has been brought to the attention of Council. All other possible known sources of groundwater contamination have been removed.
- The Department of Defence has not made any provisions for possible future claims by local residents against the Commonwealth asserting that off site contamination (beyond the Randwick site boundaries) is directly attributable to Defence practices in earlier times. Any claims that may arise would be managed by the Commonwealth as a separate matter due to the complexities associated with such claims. The issue will be complicated by the bulk of the Randwick suburb having been built at a time when asbestos, lead paints and other contaminants were commonly used in the building (and many commercial) industries.
- Defence has no jurisdiction to investigate possible off-site contamination.

Comment 4

- The Master Plan and Development Control Plan (DCP) for the Site were developed and accepted by Council following a period of extensive consultation with government and community groups. The built form parameters for the Site, which received a high commendation from the Mayor of Randwick Council, are prescribed in both of these documents and their purpose is to manage the urban design of the site and ensure consistency through to the end development.
- The construction of dwellings on the site can only proceed if Council approves the proposed built form put forward in the developer's Development Applications. If the proposed buildings are not in keeping with the Master Plan and DCP, Council will refuse Development Consent.

Yours sincerely



MICHAEL PEZZULLO
Assistant Secretary
Strategic Planning and Estate Development

4 April 2003