

ASSPED 215 /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 5 from The Spot Precinct dated 24 March 2003 to Defence for comment.

The Spot Precinct's submission makes a number of observations and suggestions for the Committee's consideration as follows:

1. The Defence statement of Evidence lacks sufficient detail to clearly explain how the Site will be remediated;
2. Insufficient attention to detail could lead to significant cost increases;
3. Remediation activities must be subject to separate Development Applications;
4. Asbestos removal processes are exacting and must be followed to ensure the safety of surrounding residents. An appropriate Asbestos Risk Assessment Plan, formulated in consultation with the surrounding residents, is required prior to the commencement of any work;
5. Separate Development Applications, Risk Assessments and Remediation Plans are required for all contaminants potentially affecting the water table. All ground water requires correct treatment prior to further development;
6. There is inadequate information on the existing vegetation, wetlands, flora and fauna. Further studies are required, and Plans of Management must be raised or reviewed;
7. Defence should make a financial contribution to funding public transport to the site;
8. A toll free contact number should be provided on a 24 hour, 7 days per week basis, site signage should be prescriptive as to the nature and phases of work, information bulletins should be mailed to residents and a web site should be considered.

DEFENCE RESPONSE

Comment 1

- The Statement of Evidence contains sufficient information to enable the Committee to make an informed decision on a project. Any information requiring further explanation can be expanded upon in the course of hearing. Before compiling its Report and Recommendations, the Committee will have sufficient information to make informed decisions.

Comment 2

- The budget sought by Defence takes into account all known factors, and is based on industry best practice. In any project, unforeseen situations can occur and the management of these unforeseen elements is through the use of project contingency funds, separately identified within the budget. Unallocated contingency funds are returned to Defence. Should an unforeseen situation exceed the contingency allocation, additional funds can be sought through the Department of Finance.
- The removal of contaminants is the critical risk area within the proposed project. The allocation of funds to this element of the project has been conservative and costs are most unlikely to exceed the available funds. If necessary, other elements of the project, such as trunk infrastructure, can be reduced in scope to ensure the successful removal of contaminants.

Comment 3

- Separate Development Applications are not required for remediation of the Site as this activity has already been approved under a Notice of Intent by Environment Australia. Nonetheless, Council have placed a deferred commencement condition on all Development Applications on the Site requiring a Site Audit Statement for each area and all remediation works are to be carried out in accordance with the requirements of the *Contaminated Land Management Act 1997*, environmental planning instruments applying to the Site, Environment Protection Authority and PlanningNSW guidelines, Council's *Contaminated Land Policy 1999* and the *Protection of the Environment Operations Act 1997*.
- A total of seven development applications have been lodged with the Randwick City Council (Council) since the adoption of the Master Plan in November 2001. Four of the development applications are for the subdivision of the Site and the construction of road and services. Other development applications have been lodged for the construction of the new community facility and the embellishment of the Randwick Environmental Park (REP) and the dry excavation of sediment from the wetland detention basin.
- All Development Applications have been documented in accordance with the adopted Master Plan for the Site. Following submission to Council, they are placed on public exhibition for an extended period of time, in some instances up to four weeks longer than the required statutory period. The extension of the exhibition period is at the discretion of Council. During the exhibition period, statements and submissions are invited from the community.

Comment 4

- Asbestos removal will be undertaken in accordance with best practice, relevant federal and state legislation and recognised OH&S practices. Asbestos removal has occurred across the Site precinct over recent years, and the practices employed have been scrutinised by the relevant authorities such as WorkCover as well as various union bodies such as the NSW Labor Council. The practices employed have been found to meet or exceed all required standards, and the surrounding residents were not and will not be placed at risk.
- 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.
- Copies of all air monitoring results were provided to Council.

Comment 5

- 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.

Comment 6

- Extensive and structured studies of both flora and fauna were conducted in the course of obtaining environmental clearance for these proposed works. These studies were conducted in accordance with *the Environment Protection (Impact of Proposals) Act 1974*, and in close consultation with both state and federal environmental bodies. The resulting Notice of Intent (NOI) is a public document, and development planning has been undertaken in accordance with the Recommendations made within that document.
- The existing NOI will be reviewed, and any further studies required will be commissioned. A Plan of Management for the REP has recently been completed and is scheduled to go on exhibition in the near future following a review by the NSW National Parks and Wildlife Service, Dept of Land and Water Conservation and Dr Paul Adam.

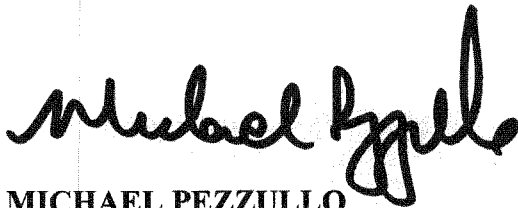
Comment 7

- The Spot Precinct submission notes that there will be approximately 1000 additional dwellings constructed on the sites. These will all attract municipal rates, which should cover any additional public transport services deemed necessary. This matter is seen as a matter for Council to address.

Comment 8

- The Master Plan considered Council and the broader community's responses to Defence proposals for the Site submitted during the previous five years. Extensive consultation was also undertaken with Council who in turn consulted with representatives of key community groups in the preparation of the final Master Plan, adopted in November 2001. A further public information session was held on 13 October 2001 during the Master Plan advertising and assessment period, providing yet another opportunity for the community to make submissions to Council.
- Signs posted in several locations along the Site boundary fence contain phone numbers for the Environmental/Community Liaison Officer, the Project Site Office and a 24 hour hotline number to phone in case of an emergency.
- Defence regularly hand delivers a Neighbourhood Newsletter to surrounding residents, Randwick Community Centre, Randwick and Moverly Green Childcare Centres, SOS Preschool and Council prior to the commencement of significant site works. The newsletter provides a detailed outline of the works proposed and the safety and environmental safeguards established to protect both works and surrounding residents. Eight newsletters have been issues since site works commenced in November 2001.
- Defence has also had successful briefings with the Randwick Community Centre, SOS Preschool, Moverly Childcare Centre, Dr Paul Adam and the NSW Labor Council.
- A Site specific website www.defencesiterandwick.com exists. Community consultation is seen as an essential element of this project.

Yours sincerely



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Strategic Planning and Estate Development

4 April 2003