



Infrastructure Division
Brindabella Park
BP-2-A003
CANBERRA ACT 2600

ASSPED 216 /03

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 6 from Mr Lex Davidson dated 18 March 2003 to Defence for comment.

Mr Lex Davidson's submission makes a number of observations and suggestions for the Parliamentary Standing Committee on Public Works' (PWC) consideration. His concerns can be summarised as follows:

1. The location of Oval Avenue will have an adverse effect on he and his partner and suggests Defence have not considered alternative options including directing all traffic to Avoca Street;
2. Potential impacts of contamination both on and off site, the appropriateness of any standards set for the remediation process and the possibility that contamination of the Site will exist following remediation;
3. The cause of ground water contamination;
4. The development's impact on rare and protected species and the removal of mature trees on and off site;
5. Whether the Department of Defence (Defence) has the ability and authority to dispose of the Site. Mr Davidson believes that Defence chose the wrong development option of the three considered within the Statement of Evidence and that a fourth option, offering the land to the wider public, should also have been considered;
6. That Site workers did not have access to showers during the demolition/remediation works;
7. Mr Davidson expresses a view there is an ongoing lack or transparency in regard to contamination documentation.

DEFENCE RESPONSE

Comment 1

- The road layout, including Oval Avenue, reflects the historical layout of the Navy Stores as recommended by the heritage consultant and supported by Environment Australia.
- The road layout ensures that traffic is managed and integrated into the surrounding community, providing easy access to parklands and the proposed new community facility.
- The relocation of Oval Avenue to an existing intersection 44 metres to the east, as suggested by Mr Davidson, detrimentally affects block lengths, bus routes, street widths and vistas. It would also lead to increased headlight glare elsewhere.
- The proposal to direct all traffic to Avoca Street would create an enclave or 'gated' development which is against Randwick City Council's (Council) and the generally community's wishes.
- The change would have significant implications for the Site's adopted master plan that was approved by Council in 2001. Council considered this issue at length, including consulting with affected parties, and subsequently addressed the issue in their report to Council recommending the adoption of the Site's Development Control Plan (DCP) and draft amendment to the Randwick Local Environmental Plan (RLEP) on 11 March 2003. The report considered no modifications were necessary.

Comment 2

- The assessment of on-site contamination 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 on the site is being undertaken in accordance with all relevant Commonwealth and State Acts, Regulations, and Codes of Practice.
- 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 Department 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.
- All work is reviewed by an independent environmental consultant appointed by the NSW Labor Council. An Environmental/Community Liaison Officer also reports to Council.

Comment 3

- The remaining ground water contamination on the Site has occurred from a leaking sewer main, which is to be replaced during the development of 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 4

- There has been no destruction of the Site's rare and protected ecological community, Eastern Suburbs Banksia Scrub (ESBS). All vegetation clearance on the disposal site and Randwick Environmental Park (REP) has been reviewed and cleared either by Environment Australia, Council or NSW National Parks & Wildlife Service (NPWS).
- Vegetation clearing within the REP has generally been limited to the clearing of lantana, a noxious weed. In all instances, relevant permission and/or approvals have been obtained from Council, NPWS and/or Environment Australia;
- A Plan of Management has also been drafted to assist in the long term management and revegetation of the REP. This will protect all native vegetation whether classified as a threatened species or not. Part of the plan has been implemented through the removal of lantana, a noxious weed, which will assist in the natural regeneration of ESBS.
- A limited number of mature trees within the disposal site have been removed to allow site decontamination and remediation. Trees outside the Site, along Bundock Street, are the responsibility of Council and are expected to be removed for the construction of footpaths and services.

Comment 5

- The disposal of surplus Defence properties are undertaken under the auspices of the *Land Acquisitions Act 1997*, and in line with Commonwealth Property Disposal Policy.
- Defence reports to an Inter-Departmental Committee represented by Department of Finance and Administration, Prime Minister & Cabinet, Treasury and Defence, for its disposal strategies and financial management to ensure the optimal return to the Commonwealth.
- Independent reviews determined that 'value adding' through site remediation and the construction of trunk infrastructure would provide the optimal revenue return to Defence.
- Defence has expertise in land management and disposals both internally and externally. Many of the Defence public servants working within the Property Disposals Task Force (PDTF) have tertiary qualifications in environmental and project management or land economics. These internal skills are supplemented by external advice from specialist consultants as and when required. These specialists are often the same ones used by the most well-known and respected developers in Australia.
- State and local government authorities or entities may approach Defence to acquire a surplus Commonwealth site in line with Commonwealth Policy. No such body has expressed interest in acquiring the Randwick site.

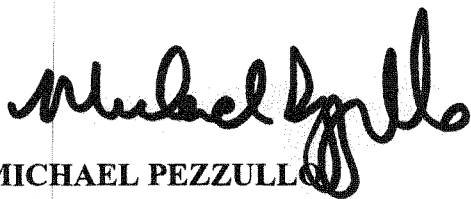
Comment 6

- The provision of showers for workers is the responsibility of the contractor. Under NSW OH&S legislation, contractors are required to provide a change room with showers as part of their site amenities. The Defence Site Office also contains showers. It is worth noting, though, that the contractor also provided a decontamination unit, despite this not being required under any legislation for the type of work being carried out.

Comment 7

- Defence has made all contamination documentation available to the community through:
 - briefings to the Randwick Community Centre, SOS Preschool and Moverly Green Childcare Centre; and
 - Invitations in the regular Site Newsletter to contact the Site Office to view documentation and/or obtain a copy of the Summary of Asbestos Results paper.
- A catalogue of all project documentation in regard to contamination assessments was also provided to the NSW Labor Council.

Yours sincerely



MICHAEL PEZZULLO
Assistant Secretary
Strategic Planning and Estate Development

4 April 2003