

Mr John Hann
Chair
Independent Planning Commission
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Sydney NSW 2000

Arcadis Australia Pacific Pty Ltd
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21/11/2019

SSD-10154 QANTAS FLIGHT TRAINING CENTRE - APPLICANT BRIEFING SUPPLEMENTARY INFORMATION

Dear John,

Reference is made to the Development Application for State Significant Development (**SSD-10154**) for the Qantas Flight Training Centre and the presentation by the proponent's team to the appointed Independent Planning Commission (**IPC**) members and site walk on 19 November 2019.

Arcadis provide the following advice in relation to the draft Remediation of Land State Environmental Planning Policy (SEPP55) as exhibited between 31 January to 13 April 2018.

Arcadis reviewed the Draft SEPP55 changes and cross referenced the relevant Arcadis - Assessment Reports and Management Plans for compliance against each proposed change (refer Table appended here).

Arcadis prepared the following Assessment Reports and Management Plans for the site (297 King St, Mascot NSW 2020):

Arcadis (2019). Environmental Site Assessment (ESA), January 2019.

Arcadis (2019). Acid Sulfate Soil Investigation (ASS), February 2019.

Arcadis (2019). Acid Sulfate Soil Management Plan (ASSMP), February 2019.

Arcadis (2019). Remediation Action Plan (RAP), February 2019.

Arcadis (2019). Asbestos Management Plan (AMP), March 2019.

Arcadis (2019). Environmental Management Plan (EMP), April 2019.

Arcadis (2019). Construction Environmental Management Plan (CEMP), September 2019.

Arcadis notes that a RAP has been prepared, however, the site is not being remediated and potential human exposure to impacted soil and groundwater is to be managed under a CEMP during the construction phase as approved by the NSW EPA Accredited Site Auditor.

The existing Reports and Plans show compliance with the Draft SEPP55 changes, with the following single exception:

- The CEMP Section 12, details the hours of operation (in compliance with guidelines / standards) but also includes the following statement:


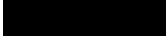
Arcadis understands Qantas are seeking approval for construction to be undertaken between the hours of 6:00am to 8:00pm Monday to Sunday due to the critical nature of the project.

It is requested that this correspondence is considered an amendment to SSD-10154 as submitted and before the IPC for determination.

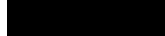
Yours sincerely,



James Van Der Helm
Senior Environmental Scientist



Loek Munnichs
Principal Environmental Scientist



Inclusions / attachments.

- Arcadis SEPP55 review table.

Background

The remediation has been classified as “category 2”. A significant modification to the notification protocol currently in use for category 2 has been proposed. Note that this change has not been endorsed yet. Changes to the notification protocol for Category 2 remediation are summarised below:

Draft SEPP55 Proposed Section Change / Update	Draft SEPP55 - Change Detail	Draft SEPP55 - Arcadis Reports and Plans	Compliant with the Draft SEPP55
In addition to notifying the council in advance of works commencing, with property and works information, a timeline of works and the completion of works, an applicant will need to provide:	A remediation plan certified by a certified (EPA recognised) contaminated land consultant, indicating that the contaminated land consultant has reviewed all the relevant data relating to site contamination and is satisfied that the plan is sufficient to support the remediation method selected and to establish the appropriate remediation category (supported by site data). Relevant certified consultants include:	Arcadis prepared the following Assessment Reports and Management Plans for the site (297 King St, Mascot NSW 2020): Arcadis (2019). Environmental Site Assessment (ESA), January 2019. Arcadis (2019). Acid Sulfate Soil Investigation (ASS), February 2019. Arcadis (2019). Acid Sulfate Soil Management Plan (ASSMP), February 2019. Arcadis (2019). Remediation Action Plan (RAP), February 2019. Arcadis (2019). Asbestos Management Plan (AMP), March 2019. Arcadis (2019). Environmental Management Plan (EMP), April 2019. Arcadis (2019). Construction Environmental Management Plan (CEMP), September 2019.	Yes
	Environment Institute of Australia and New Zealand’s (EIANZ) Certified Environmental Practitioner Scheme (CEnvP) and CEnvP Site Contamination Specialist (CEnvP – SC)	Arcadis Certified Environmental Practitioner Scheme (CEnvP) and CEnvP Site Contamination Specialist (CEnvP – SC) Loek Munnichs, was consulted throughout the drafting, review and approval process for the development of Assessment Reports and Management Plans (ESA, ASSMP, RAP, AMP, EMP and CEMP).	Yes
	Soil Science Australia (SSA) Certified Professional Soil Scientist Contaminated Site Assessment and Management Practitioners.	refer comment above	N/A
A remediation plan including:	A description of the remediation method.	Arcadis prepared a RAP for the site (297 King St, Mascot NSW 2020). Arcadis (2019). Remediation Action Plan (RAP), February 2019.	Yes
	The procedures for treatment or disposal of materials generated during remediation.	The RAP Section 6 Remediation Options, details the extent of remediation required, provides an evaluation of the remedial options available to the site and includes treatment and disposal.	Yes
	The validation sampling and analysis required to demonstrate that remediation has been successful.	The RAP Section 7 Validation Plan , details the validation methodology required and includes soil validation criteria and reporting requirements.	Yes
	Backfill and/or reinstatement of the site required following remediation.	The RAP Section 6.3 and Section 6.9 addresses Backfill of Excavations and certification of imported fill material.	Yes
	Any assessments of site contamination (preliminary site investigation or detailed site investigation) that have been prepared.	The RAP Section 3 Contamination Status, provides a summary of previous environmental investigation work conducted at the site and includes the following Assessment Reports: Environmental Strategies (2013), Tank Pit Investigation, Mascot NSW. Environmental Strategies (2016), Groundwater Monitoring Event, Mascot NSW. Arcadis (2019) Environmental Site Assessment (ESA). 297 King Street North, Mascot NSW.	Yes
Post work notifications must include:	A validation report prepared, or reviewed and approved, by a certified contaminated land consultant.	The CEMP Section 1.2.1 and Section 14.1, for the site stipulates that the site is subject to a Site Audit in relation to contamination status and that a Validation Report prepared by a suitably qualified environmental professional is required. The RAP Section 6.11 and Section 7 Validation Plan , details the validation methodology required and includes soil validation criteria and reporting requirements.	Yes
	Confirmation that the works were carried out in accordance with the certified remediation plan.	refer comment above.	Yes

		<p>The CEMP Section 1.2.1 and Section 14.1, for the site stipulates that the site is subject to a Site Audit in relation to contamination status and that a clear statement regarding site suitability prepared by a suitably qualified environmental professional is required.</p> <p>The RAP Section 12, details that successful implementation of the RAP, will enable the site to be suitable for proposed commercial / industrial land use.</p>	
	A statement as to whether the land is suitable for the proposed use.	<p>The ESA Section 12 3 Conclusions and Recommendations, included eight (8) recommendations followed by a statement that: <i>The objectives of the ESA at the Site are considered to have been met regarding soil and groundwater conditions, within the limitations of the scope completed. Arcadis consider this ESA to be suitable for characterisation of the site against potential sources of contamination and associated contaminants arising from a site history that included farming, agriculture, rail, manufacturing and commercial / industrial land uses. Within the limitations of the report and the conclusions and recommendations provided, Arcadis considers the site to be suitable for the proposed land use.</i></p>	Yes
	A statement as to whether the land is subject to any restriction or ongoing management requirements following remediation.	<p>Arcadis prepared the following Management Plan for the site (297 King St, Mascot NSW 2020): Arcadis (2019). Environmental Management Plan (EMP), April 2019. The EMP has been prepared for the management of contaminated groundwater at the site if intrusive works, excavation or other works are undertaken during future construction or maintenance events due to the presence of residual groundwater contamination remaining onsite post redevelopment. The EMP may need to be updated at the conclusion of remediation or bulk earthworks depending on the ultimate treatment/management of contaminated soils onsite. If contaminated soils remain onsite (encapsulated, buried, utilised in landscaping etc.) the EMP will need to be updated accordingly.</p>	Yes
	A copy of the environment management plan (EMP), if required.		
State based standard operational requirements will be introduced for category 2 remediation work to Hours of operation: ensure that the remediation work will not have an Monday – Friday: 7am - 6pm. adverse effect on the community and the Saturday: 8am - 1pm. environment. These requirements relate to the No work permitted on Sundays or Public Holidays. following:		<p>The CEMP Section 12, details the hours of operation and also includes the following statement; <i>Arcadis understands Qantas are seeking approval for construction to be undertaken between the hours of 6:00am to 8:00pm Monday to Sunday due to the critical nature of the project.</i></p>	No
		The RAP Section 9.1, details the hours of operation.	Yes
		The CEMP Section 15.4, details the management of excavations containing contaminated material. Reference to the management of excavations is made in multiple locations throughout the CEMP. These references mainly relate to the avoiding excavations being left open and the risk of accumulation of contaminated groundwaters.	Yes
Soil management:	Excavations in accordance with Excavation Work: Code of Practice (SafeWork NSW 2015) and individually fenced when not attended.	<p>The RAP Section 6.10, fencing of remediation work areas. Section 10.5.2 addresses physical hazards associated with work in or near excavations. The CEMP Section 7, details the management of soils and sediment. CEMP Section 9, details the management of water and drainage during construction.</p>	Yes
	Sediment control for runoff and vehicle movement	The RAP Section 9.2, details soil, water and runoff management.	Yes

	Stockpile management	The CEMP Section 13, details the management of stockpiles during construction.	Yes
		The RAP Section 6.7 and Section 9.4, details stockpile management.	
Noise and vibration control:	Maintained below the maximum levels specified in Australian Standard AS 2436 - Guide to noise and vibration control on construction, demolition and maintenance sites;	The CEMP Section 12, details the Noise and Vibration Management.	Yes
		The RAP Section 9.5 and Section 9.6, details Noise and Vibration management. Norman Disney and Young (2019). Report - Assessment of Noise and Vibration Emissions (SEARs), February 2019.	
	Protection of the Environment Operations (Noise Control) Regulation 2017, and EPA's Interim Construction Noise Guideline 2009.	The CEMP Section 5 and Section 12, details the Legislation, Guidelines, Standards and Codes of Practice relevant to Noise emissions.	Yes
		The RAP Section 9.5, details Noise management.	
Dust and odour control.		The CEMP Section 10, details the management of dust and odours during construction.	Yes
		The RAP Section 9.8 and Section 9.9, details the management of dust and odours.	
Vehicles and waste management.		The CEMP Section 11, details the management of waste. The CEMP Section 12, details the management of vehicles, plant and machinery in relation to Noise and Vibration Management.	Yes
		The RAP Section 9.10 and Section 9.11, details the management of vehicles / transport and waste.	
Tree protection.		The CEMP Section 1.1, details existing site features and includes vegetation.	Yes
		The RAP Section 1.1 details existing site features and includes vegetation.	