

22 December 2023

Matt Chapple
Project Manager
Building (NSW/ACT)
John Holland
Level 3, 100 Harris St, Pyrmont, NSW 2009

Dear Matt,

Re: Sydney Football Stadium Redevelopment - Precinct Village & Carpark, Moore Park Interim Audit Advice #2: Report on soil tracking

1.0 Introduction and Background

Jason Clay (the auditor) of Senversa Pty Ltd has been engaged by John Holland Group Pty Ltd (JHG) as a NSW Environment Protection Authority (EPA) accredited site auditor for the redevelopment of the Precinct Village & Carpark (PV&C) component of the Sydney Football Stadium (SFS) redevelopment, located off Driver Avenue, Moore Park, NSW (the site).

Redevelopment of the Sydney Football Stadium (SFS) has been completed on the site of the original stadium (Allianz Stadium) at Moore Park, Sydney. Development of the adjacent Moore Park Precinct Village (understood to include retail pavilion, tennis clubhouse and tennis courts, children's playground and up to 1,500 space multi-level carpark), located to the west of the SFS, is now proposed. It is understood that JHG is contracted to complete the Early Works scope of the PV&C development which includes:

1. Stormwater diversion around the MP1 carpark.
2. Sewer diversion of Sydney Water asset at north-west corner of the Western MP1 carpark.

Site audit services are required as part of the Significant Development (SSD) conditions of consent SSD-9835 Stage 2 Design and Construction, lodged by Infrastructure NSW, on behalf of the NSW Government, and approved by the Minister for Planning and Public Spaces. The relevant conditions include:

Site Auditor

C32. The nominated Site Auditor be appointed throughout the duration of the construction works.

C33. If unexpected contamination is found during site works at levels that may pose a risk to human health or the environment, the unexpected finds protocol in accordance with the CEMP (condition B22) must be implemented on site and the Site Auditor must inform the Planning Secretary immediately.

C34. The nominated Site Auditor must ensure that any work required in relation to soil or groundwater contamination is appropriately managed throughout the construction works. If work is to



be completed in stages, the Site Auditor must confirm satisfactory completion of each stage by the issuance of Interim Audit Advice.

Soil Contamination and Site Audit

Condition D53A. Prior to the occupation of each stage of the Precinct Village and multi-level carpark and its associated public domain areas, the Applicant must submit the following to the Planning Secretary, EPA and Council for information:

- a) *Section A1 Site Audit Statement or a Section A2 Site Audit Statement signed by a NSW EPA-accredited Site Auditor, certifying that all relevant parts of the Precinct Village and multi-level carpark and its associated public domain areas are suitable for the proposed land use.*

Condition D54A. The Precinct Village and multi-level carpark and its public domain areas (either in whole or part) must not be occupied until the following requirements are complied with:

- a) *written confirmation has been obtained from the Planning Secretary stating that the requirements of D53A(a) have been complied with.*
- b) *a copy of the written confirmation from the Planning Secretary has been provided to the Certifier for information.*

2.0 Documents Reviewed

JHG has provided the following documentation for consideration. The purpose of this Interim Audit Advice (IAA) is to provide comment on the document with respect to site contamination and the audit process.

3. *'Report on soil tracking, Stormwater and Sewer Realignment Project, Members Carpark, Driver Avenue, Moore Park, Sydney NSW', Douglas Partners dated 20 December 2023.*

3.0 Review Comments

Auditor comments are provided in the grey box below and are for resolution. Please provide a response register and updated report (tracked changes) by return.

1. As noted in the email from the auditor dated 5 December 2023, please include the asbestos clearance certificate as an attachment to the report and provide accompanying discussion within the report.
2. Confirm what document(s) (if any) were referred to guide the characterisation/validation works (in particular for imported material). For example, was reference made to the Remediation Action Plan previously prepared for the SFS with respect to assessment/validation of imported material?
3. Confirm if all of the works were within the asphalt pavement cap and there was no disturbance of the garden beds. This comment also relates to inclusion of asbestos clearance activities/discussion, noting that some site-won material appeared to have been placed in garden bed areas based on site visit observations. Clarification required.
4. Section 4.5. The auditor has not reviewed the details pertaining to reuse of fill material at the site as it is understood all fill material was disposed off-site and not reused as backfill.
5. Section 5.6. Confirm if requirements for works beneath the capping layer outlined in the LTEMP were followed and provide details.
 - Confirm stockpile management and validation/clearance of stockpile footprints.
 - Confirm if the capping layer was reinstated to that outlined in the LTEMP (minimum 250 mm subgrade pavement or 200 mm growing media over existing fill for areas within garden beds). Provide details on how this capping layer was verified (were measurements or surveys collected prior to and following reinstatement). Confirm that the works and reinstatement are appropriate and do not warrant an update to the current LTEMP.
 - Confirm if any unexpected finds were encountered and if so, provide details.



6. Section 7.0.

- The auditor notes that no validation samples were collected by the environmental consultant for several import sources and limited supplier documentation (no chemical analysis) was provided, namely for Sections 7.2 (quarried VENM), 7.3 (recycled material) and 7.4 (quarried VENM). Please expand discussion on why the material is considered suitable for use/placement on site with consideration of available lines of evidence which may include:
 - Visual inspection records (based on Appendix F, it appears the material was inspected on-site. Confirm if the inspection was undertaken by the environmental consultant or contractor).
 - Placement of the material on-site and the broader site-use with respect to data gaps in validation sampling, material source (natural material/recycled), and potential for future access by site users.
 - The area will be covered by the LTEMP in future.

Please expand conclusions to confirm the material does not present an unacceptable risk to future site users.

7. Appendix B. It appears that the site boundary for the members carpark does not match that presented in the LTEMP. A thin red line is present on the figure which appears to be the site boundary shown in the LTEMP, but this isn't included in the legend. Other types of lines are present on the figure but not in the legend. Please update/clarify.

8. Appendix C1.

- Based on Table D1 provided, it appears that locations outside of the works alignment have been included in the waste classification assessment (locations TPS, TPT and TPU). Please confirm the reasoning for this, noting that location TPA (elsewhere along the boundary of the works alignment) was not considered in the waste classification assessment despite exceeding SCC1 criteria and being in closer proximity to the work area. Confirm that the material within the works alignment was classified appropriately.
- Confirm all historical data collected for the alignment has been included in these tables and was considered when classifying the waste. It appears locations in the series BH2 are within the alignment but are not included in these tables.

9. Appendix F. There are inconsistencies/a lack of clarity between material tracking register and imported material docket. Please update column 4 of the register to include the supplier for the material (i.e., for River Sand natural the material was sourced from Sandy Point Quarry and supplied by BC Sands).

10. Appendix J1 Section 1, and Appendix J3 Section 2. Confirm whether the duplicate frequency criteria was 5% or 10% (it is inconsistent between these two sections) and provide a comment if this was achieved.

4.0 Closure

The auditor looks forward to the resolution of the above comments. Please do not hesitate to contact the undersigned should you have any queries on the above.

Yours sincerely,
On behalf of **Senversa Pty Ltd**

Jason Clay
NSW EPA Contaminated Sites Auditor (0801)

KR/JC



Technical Limitations and Uncertainty – *This Interim Advice is not a Site Audit Report or a Site Audit Statement, as defined in the Contaminated Land Management Act 1997, but forms part of the Site Audit process. It is intended that a Site Audit Statement and report will be issued at the completion of the site audit.*

Consistent with NSW EPA requirements for staged “sign-off” of sites that are the subject of progressive assessment, remediation and validation, the auditor is required to advise that:

- *This site audit advice does not constitute a site audit report or statement.*
- *This letter is considered by the auditor to be consistent with NSW EPA guidelines and policies.*
- *This letter will be documented in the final Site Audit Statement and associated documentation.*
- *At the completion of the site audit, a Site Audit Statement will be prepared, for the consent agency to include the Site’s property information, held by the local council.*

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