

18 October 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 #1: Review of Construction Environmental Management Plan and Preliminary Material Tracking Records

#### 1. 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:

- Stormwater diversion around the MP1 carpark.
- 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. 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.

- John Holland (2023). *Sydney Football Stadium Redevelopment Stage 2, Construction Environmental Management Plan*. Reference: SFS-JHG-00-PLN-PM060000, Revision D, dated 24 April 2023. (Referred to herein as 'the CEMP').
- Precinct Village and Car Park (Early Works), Material Import Tracker. Excel file showing records from 30 May 2023 to 30 August 2023. (Referred to herein as 'the Material Import Tracker').
- PV&C – Cartage Summary and Tracking. PDF file showing records from 7 June 2023 to 29 August 2023. (Referred to herein as 'the Cartage Summary and Tracking').

## 3. Review Comments

Auditor comments are provided in the grey shaded box. A response is required to each of the following comments.



### **Construction Environmental Management Plan (CEMP) (John Holland, 2023).**

- The following general observations are made:
  - The CEMP is an operational document addressing a range of construction related matters, many of which fall outside of the scope of the contamination site audit. The Auditor has reviewed the CEMP in relation to contamination only.
  - From review of Section 1 Revisions and Distribution information, it is understood that the CEMP adopted for the construction of the SFS and Sydney Fitness Facility (SFF) has been updated to incorporate the Precinct Village and Carpark (SSD Modification 7).
- Section 5.2 Project Scope – the project description provided (page 13 of PDF) includes reference to a children's playground. Please provide a labelled copy of the development masterplan showing proposed future land uses and extent of below ground carpark construction). Where future recreational/open space land uses (e.g., playground) are proposed, retained or imported soil/fill should be assessed accordingly to confirm suitability for this land use.
- The CEMP refers to the following documents. Please provide copies for consideration.
  - Asbestos Procedure JH-MPR-WHS-024.
  - Construction Waste Management Sub-Plan.
  - Construction Soil and Water Management Sub-Plan.
- Appendix 2 Aspects, Impacts, Mitigation and Legislation – it is assumed the RAP referred to in row 7 is the RAP prepared for the SFS.
- Appendix 6 Unexpected Finds Protocol (UFP) - the UFP included as an attachment to the CEMP refers to the SFS rather than the PV&C; however, this is not considered to impact the overall effectiveness of the UFP. The UFP flow chart refers to assessment against NEPM D criteria (i.e., commercial-industrial land use). As noted within this IAA, subject to the land uses included within the redevelopment masterplan, it may be necessary to consider more sensitive land uses (e.g., recreational / open space for children's playground).
- The CEMP does not address validation of imported material and material tracking requirements. From a recent site visit (19 September 2023) it is understood that JHG, with support from a contaminated land consultant, is referring to the previous SFS Remedial Action Plan for guidance on material management. At completion of the project, all material tracking information (imported material, off-site movement, internal material movement) should be compiled, summarised and presented to the site auditor for consideration. This document, to be prepared by an appropriately experienced environmental consultant, should also include details of any unexpected finds. Typical material tracking supporting documents include waste classification reports, imported material source records, import validation documentation confirming suitability, and import/export transport dockets.
- A Long-Term Environmental Management Plan (LTEMP) is in place for the site. It may be necessary to update this or issue a separate one for the carpark upon completion.



### Material Import Tracker

- Expand the Material Import Tracker to include:
  - Source site address (currently PO Box listed for Benedict Pty Ltd).
  - Material classification for each of the material types imported (e.g., VENM, quarried material, recycled material meeting RRO/RRE).
  - Reference to supplier documentation and also material assessment/classification reports validating material is suitable for use.
  - Confirmation of visual inspection on site to confirm material is consistent with classification and free from contamination.
  - Placement/use of material on site (e.g., service backfill and depth).
- Provide supporting transport dockets for all material delivered to site.

### Cartage Summary and Tracking

- Clarify what is "ACx1" load (Boral Widemere).
- List waste facility licence number.
- In addition to the Cartage Summary, provide additional tracking with disposal dockets listed.
- Confirm origin/source of waste materials within the site (in tracker or within future completion report).
- Provide supporting disposal dockets and waste classification reports for material disposed off-site.

## 4. Close

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)

**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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