



02 April 2024

Ref No: F2007/00372

Department of Climate Change, Energy, the
Environment, and Water (DCCEEW)
www.epbcpublicportal.awe.gov.au/all-referrals/

Dear Sir/Madam,

RE: Bundock Street Housing Redevelopment

Thank you for the opportunity to comment on the Bundock Street Housing Redevelopment as notified in the exhibition notice seeking comments on the project.

Council has assessed the documents on exhibition and makes the following comments on the project:

Site Contamination

Council notes that a Detailed Site Investigation (DSI) has been undertaken by environmental consultants, SLR, on behalf of the Department of Defence, and details a number of contaminants for the whole Defence site (that is, inclusive of both the housing redevelopment site for 62 dwellings and the wider vacant site that has been proposed for the LIA). In particular, the report advises that asbestos in the form of asbestos fibres (fibrous asbestos and asbestos fines) and Asbestos Containing Materials (ACMs) is present across the site, and concentrated in the vicinity of the former Naval Stores, particularly in vegetated areas along the northern portion of the site, underlying the vegetated strips lining the verges of the concrete slabs across the site, in fill areas towards the south west boundary of the site, and to a lesser extent on the south eastern portion of the site. The bulk of asbestos impacted soils appears to be in the soil surface to approximately 0.2m below ground level. The report also identified other contaminants, including heavy metals, hydrocarbons and PFAS compounds, to varying concentrations.

The SLR report has been reviewed by Council's Environmental Health Officers and referred to an independent EPA Accredited Site Auditor from Douglas Partners (DP) for peer review. The Peer Review report raises the following relevant, key concerns:

- Groundwater is contaminated with certain metals and organic compounds, namely chlorinated compounds and PFAS from the former metal works. Further testing of groundwater is recommended by SLR to assess risk posed to the subject site and surrounding areas. While the risk to neighbouring sites (and in particular the Randwick Environmental Park) posed by the identified contamination sources were generally addressed in a Conceptual Site Model (CSM), an assessment of actual risk has not been provided in the DSI and will need further assessment.
Recommendation: As such, Council recommends that a Human Health Risk Assessment (HHRA) to determine current risks (posed for example by surficial asbestos) and future risks during remediation, or indeed in regard to future land uses, be required to be prepared for the whole Defence site.
- Significant dust blows are likely to occur during soil disturbance /earthworks/remediation on site as well as at other times depending on prevailing weather conditions, the condition of the surface soils containing asbestos and the nature of the asbestos in those soils. SLR has not fully addressed these issues and the necessary management action. Particularly in relation to ongoing concerns by nearby residents in relation to asbestos fibres (fibrous asbestos and asbestos fines) and Asbestos Containing Materials (ACMs) which is present across the site.

<p>English</p> <p>If you need help to understand this letter, please come to Council's Customer Service Centre and ask for assistance in your language or you can contact the Telephone Interpreter Service (TIS) on 131 450 and ask them to contact Council on 1300 722 542.</p>	<p>Greek</p> <p>Αν χρειάζεστε βοήθεια για να καταλάβετε αυτή την επιστολή, παρακαλείστε να έρθετε στο Κέντρο Εξυπηρέτησης Πελατών της Δημαρχίας (Council Customer Service Centre) και να ζητήσετε βοήθεια στη γλώσσα σας ή τηλεφωνήστε στην Τηλεφωνική Υπηρεσία Διερμηνέων (Telephone Interpreter Service — TIS) τηλ. 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία τηλ. 1300 722 542.</p>	<p>Italian</p> <p>Se avete bisogno di aiuto per capire il contenuto di questa lettera, recatevi presso il Customer Service Centre del Municipio dove potrete chiedere di essere assistiti nella vostra lingua; oppure mettetevi in contatto con il Servizio Telefonico Interpreti (TIS) al 131 450 e chiedete loro di mettersi in contatto col Municipio al 1300 722 542.</p>
<p>Croatian</p> <p>Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dođite u Općinski uslužni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.</p>	<p>Spanish</p> <p>A la persona que necesite ayuda para entender esta carta se le ruega venir al Centro de Servicios para Clientes [Customer Service Centre] de la Municipalidad y pedir asistencia en su propio idioma, o bien ponerse en contacto con el Servicio Telefónico de Intérpretes ["TIS"], número 131 450, para pedir que le comuniquen con la Municipalidad, cuyo teléfono es 1300 722 542.</p>	<p>Vietnamese</p> <p>Nếu quý vị không hiểu lá thư này và cần sự giúp đỡ, mời quý vị đến Trung Tâm Dịch Vụ Hướng Dẫn Khách Hàng của Hội Đồng Thành Phố (Council's Customer Service Centre) để có người nói ngôn ngữ của quý vị giúp hay quý vị có thể liên lạc Dịch Vụ Thông Dịch qua Điện Thoại (TIS) ở số 131 450 và yêu cầu họ liên lạc với Hội Đồng Thành Phố (Council) ở số 1300 722 542.</p>
<p>Polish</p> <p>Jeśli potrzebujesz pomocy w zrozumieniu treści tego pisma, przyjdź do punktu obsługi klientów (Customer Service Centre) przy Radzie Miejskiej i poproś o pomoc w języku polskim, albo zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service — TIS) pod numer 131 450 i poproś o skontaktowanie się z Radą Miejską (Council) pod numerem 1300 722 542.</p>	<p>Indonesian</p> <p>Jika Anda memerlukan bantuan untuk memahami surat ini, silakan datang ke Pusat Pelayanan Pelanggan (Customer Service Centre) Pemerintah Kotamadya (Council) dan mintalah untuk bantuan dalam bahasa Anda, atau Anda dapat menghubungi Jasa Juru Bahasa Telepon (Telephone Interpreter Service - TIS) pada nomor 131 450 dan meminta supaya mereka menghubungi Pemerintah Kotamadya pada nomor 1300 722 542.</p>	<p>Turkish</p> <p>Bu mektubu anlamak için yardima ihtiyaciniz varsa, lütfen Belediye'nin Müşteri Hizmetleri Merkezi'ne gelip kendi dilinizde yardım isteyiniz veya 131 450'den Telefonla Tercüme Servisi'ni (TIS) arayarak onlardan 1300 722 542 numaradan Belediye ile ilişkiye geçmelerini isteyiniz.</p>
<p>Hungarian</p> <p>Amennyiben a levél tartalmát nem érti és segítségre van szüksége, kérjük látogassa meg a Tanácsház Ügyfél Szolgálatát (Customer Service Centre), ahol magyar nyelven kaphat felvilágosítást, vagy hívja a Telefon Tolmacs Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapcsolják a Tanácsházat a 1300 722 542 telefonszámon.</p>	<p>Czech</p> <p>Jestliže potřebujete pomoc při porozumění tohoto dopisu, navštivte prosím naše Středisko služeb pro veřejnost (Council's Customer Service Centre) a požádejte o poskytnutí pomoci ve vaší řeči anebo zavolejte Telefonní tlumočnickou službu (TIS) na tel. číslo 131 450 a požádejte je, aby oni zavolali Městský úřad Randwick na tel. číslo 1300 722 542.</p>	<p>Arabic</p> <p>إذا أردت مُساعدة لفهم هذه الرسالة، نرجوك الحضور إلى مركز خدمة عملاء المجلس وأطلب المساعدة في لغتك، أو يُمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 وأطلب منهم الاتصال بالمجلس على رقم 1300 722 542.</p>
<p>Chinese</p> <p>如果你需要人幫助你了解這封信的內容，請來市政會顧客服務中心要求翻譯服務，或者與電話傳譯服務 (TIS) 聯繫，號碼是 131 450。請他們幫助你打電話給市政會，號碼是 1300 722 542。</p>	<p>Russian</p> <p>Если Вам требуется помощь, чтобы разобраться в этом письме, то, пожалуйста, обратитесь в Муниципальный Центр Обслуживания Клиентов и попросите оказать Вам помощь на Вашем языке или же Вы можете позвонить в Телефонную Службу Переводчиков (TIS) по номеру 131 450 и попросить их связаться с Муниципалитетом по номеру 1300 722 542.</p>	<p>Serbian</p> <p>Ako vam treba pomoć da razumete ovo pismo, molimo vas da dođete do Centra za usluge mušterijama pri Opštini (Customer Service Centre) i zamolite ih da vam pomognu na vašem jeziku, ili možete nazvati Telefonsku prevodilačku službu (TIS) na 131 450 i zamolite ih da vas povežu sa Opštinom na 1300 722 542.</p>

- and groundwater contamination, including the usage of bore water from nearby residential properties.
Recommendation: Council requested that Defence further investigate and implement mitigation measures aimed at reducing the potential risk of contaminants migrating offsite. This should include the preparation of an Interim Asbestos Management Plan before any further action is taken on-site.
- The proposal is not accompanied by a Remediation Action Plan (RAP) for the proposed development. Council notes the RAP is currently in the preparation stage and is undergoing review by Site Auditor pending finalisation by Jacobs. A copy of the RAP should be submitted to Council for review and comment.
Recommendation: Council recommends that Defence takes the necessary steps to formulate a suitable Remediation Action Plan (RAP) covering concerns highlighted in the Peer Review report and conducts both a Human Health Risk Assessment and an Interim Asbestos Management Plan before any further action is taken on-site.

Transport and traffic

A Traffic and Parking Assessment prepared by Mclarens for the project is noted including its overall assessment that there will be no detrimental impact to the performance of surrounding intersections as a result of traffic generation. Additionally, the Assessment recommends that consideration can be given to providing traffic calming devices to improve the safety and operation of Bundock Street, especially between Canberra Street and Hendy Avenue, where driveways are present.

Recommendation: The Traffic Assessment should also consider and assess the following traffic matters:

- The merits of the proposed new street network, including identifying any long-term intersection upgrades (such as new roundabouts) that could require the acquisition of the corners of properties for the future enlargements of intersections to support the overall Defence Site Masterplan. A plan illustrating the areas of land that would be dedicated to Council for intersection upgrade works, new streets and laneways is to be provided. Building setbacks from the street should be designed to ensure a generous public footpath system. Further discussions are recommended with Council in relation to street hierarchy and footpath widths.
- Clarification as to the role of Felicity Place which is currently part of the Randwick Barracks area. It appears from the project's street design to be included in the redevelopment site - providing a vehicular connection from Gumara Street to Bundock Street. The extension of Gumara Street to Felicity Place will open Felicity Place to public access and allow for vehicular access from Gumara Street to the Canberra Street/Bundock Street intersection which is not desirable for traffic planning reasons. A vehicular connection from Gumara Street to the proposed mid-block laneway, and a pedestrian and bicycle connection from the laneway to Bundock Street would be desirable.
- Incorporation of the Bundock Street Dedicated Bicycle Path along the southern side of Bundock Street as required under the Randwick LGA Bicycle Route Construction Priority Map (2015) shown below. This bicycle path is important because it would link South Coogee to the Kingsford Light Rail Terminus, via Bundock Street and Sturt Street providing light rail passengers an alternative to driving to the light rail stop. The proposed Bundock Street and Oval Avenue intersection should be designed to provide safety for the proposed bike path along the south side of Bundock Street. The provision of vehicular access via private laneways is supported as it avoids driveway conflicts with the proposed bike path on Bundock Street.



Randwick LGA Bicycle Route Construction Priority Map

- Inclusion of Traffic Management Improvements (Stage 1A - Bundock Street) identified in the Randwick DCP in the proposed development. The Randwick DCP identifies a series of staged Bundock Street traffic management and pedestrian access improvements that need to be considered as the Defence Site Masterplan is progressively delivered. Key transport improvements from the existing Masterplan as shown in Figure 35, of the Defence Site Masterplan and associated controls C5-C11 of the Master Plan Control Summary, remain valid for the proposed development.
- Council is currently examining possible Bus Stop consolidation and also future traffic management devices along Bundock Street, noting the pedestrian traffic which this (and future Defence) sites will generate. In particular, Council will require the applicant to provide two raised pedestrian crossing at locations along Bundock Street still to be determined, and accommodation of future traffic management devices is to be considered in relation to the currently proposed boundaries of properties particularly at proposed intersections. In addition, consideration is to be given to the installation of a Bus Shelter within the subject site to accommodate a consolidated Bus Stop adjacent to the proposed sub-stations. Also, greater clarity is to be given as to the ownership of the major service corridors.

Development Engineering

Council notes that the referral package includes some limited civil design and stormwater plans showing the internal roads and drainage network in the housing redevelopment site that is in alignment with the Bundock Street Master Plan and DCP. Additionally, Council also notes that Defence's engineering consultant are still refining and finalising the drainage design to meet Council's specifications so as to safely convey stormwater flows and improve upon the existing flood conditions on-site.

Recommendation: Council's development engineer requires that the following standards and specifications be incorporated into the design of the proposed housing redevelopment:

Drainage

- All drainage lines must be designed with a capacity greater than 5% AEP. Overland flowpaths must be designed for the critical 1 %AEP storm event.
- The applicant must obtain from Council the 1 %AEP and 5%AEP flood levels across the development site for the critical design storm events. All future habitable floor levels must be set above the 1 %AEP plus 500mm, (or suitably protected to this level). Garages must be at or above the 1 %AEP and open car spaces at or above the critical 5%AEP. Note: the site is in the Birds Gully and Bunnerong Road Catchment for which a flood study has been prepared.
- Any proposed onsite stormwater detention system must be designed to Council's specification and discharge parameters. The drainage system must be designed so as not to adversely impact the downstream drainage system or surrounding properties.
- The trunk drainage line to have a capacity greater than 5% AEP.

- The trunk drainage line should be designed to include the next stages of the development to ensure it can be staged appropriately without compromising capacity.
- The drainage design shall cater for the needs of the development and provide for existing overland flows so as to not have an adverse flooding impact on adjoining properties.
- The width of the drainage reserve adjacent to lot 27 is not wide enough to permit future upgrade/ replacement of the line. Subject to the depth of the drainage pipeline, the drainage reserve should be sufficiently wide to permit the installation of shoring. The width shall be at least (2 x depth of drainage line + width of drainage line).

Car Parking

- Car parking provision within the individual lots must comply with the relevant sections of Council's RDCP 2013. The design of garages and car spaces should be in accordance with the relevant sections of AS 2890.1. Open car spaces should not exceed a longitudinal grade of 1 in 20.
- Street trees and vehicular crossings should be located to maximise on-street parking.

Design Specification

- All footpath and kerb and gutter to meet Randwick Council's specifications and standard drawings.
- The road pavement design and tree surrounds must be to Council's specification.
- Carriageway widths, footpath widths and verge widths must be to Council's satisfaction.
- The road layout must be designed to accommodate garbage collection vehicles and delivery/ service trucks (such as removalist vehicles) as a minimum. All intersections must demonstrate compliance with Council's requirements and suitable swept path analysis must be undertaken.
- The proposed extension of Gumara Street should have the same road and footpath widths as per the existing widths of Gumara Street. The new Oval Lane design and widths should follow the Defence Site Masterplan (RDCP 2013, E1 Bundock Street).
- Any proposed intersection of roads within the development site and Bundock Street must be assessed for vehicle headlight impact on existing dwellings. The new roads must be designed to minimise potential adverse headlight impact.
- The road pavement design is to be carried out in accordance with Austroads standards and to council's satisfaction.
- Footpath and Kerb and Gutter to meet Randwick Council's specifications and standard drawings.
- Street tree species to be in accordance with Council's Street Tree Masterplan and approved by council.
- All above ground and below ground, existing and proposed, utility services should be located and mapped.

Street Lighting

- Low voltage electrical wires are to be placed underground. Locations of the junction pillars are to be to council's satisfaction.
- The proposed street lighting and pathway lighting shall be designed to AS/NZS 1158.3.1 and have a design category of P2 or P3 to council's satisfaction.
- The street lighting is to specify poles and LED luminaires from Ausgrid's inventory and added to the Ausgrid network.

Asset Handover

- An asset handover process shall be developed with Randwick Council and shall include:
 - Site visits and acceptance of workmanship/ quality
 - Submission of asset details including componentisation and shapefiles for visual representation in a GIS system.

Heritage

Council notes that a Heritage Impact Assessment (HIA) has been prepared for Defence by consultants, Jacobs, for the housing redevelopment site. Additionally, the HIA advises that a Heritage Management

Plan (HMP) and an Archaeological Management Plan (AMP) have also been prepared by relevant consultants for Defence for the subject site which provide detailed analysis of heritage and archaeological potential, and give guidance for future development works with respect to management of potential heritage and archaeological finds.

Recommendation: Heritage and archaeological assessment should be undertaken for the site and protocols established for the construction phase to protect potential significant Indigenous and Non-Indigenous finds identified during excavation. Appropriate interpretation (informative signage and the like) of the former history of the site, and nearby items, should be integrated in the planning of the site. Additionally, appropriate mitigation measures as outlined in the HIA, and supported by the HMP and AMP, should be included in any future approval for the proposed development.

Waste Management

Council notes that the project will provide private laneways at the rear of the proposed dwellings that will also serve as access for garbage trucks and collection, however, no details of the operation of this service have been provided.

Recommendation: The following relevant conditions that must be met in relation to the private laneway access before any agreement is reached for the use Council's garbage truck:

- The private road is to be built with load bearing capacity of a 26 tonne waste collection truck.
- The private road intersection is to be suitable for 10.5m long truck turning radius.
- Private road owner/s are to indemnify Council for any damages during waste collection.
- Future households in the proposed new housing are to consider improved waste storage and collection system in line with Council's waste policy.

Landscaping and tree removal

Defence has provided a Tree Report prepared by its consultant, Jacobs, detailing the condition and significance of existing trees on-site that was undertaken in 2021. The study area covered by the tree survey comprised both the Bundock Street housing redevelopment site (for 62 dwellings) as well as the wider Defence Master plan site in which the LIA was previously proposed. The Tree Report shows that there are no threatened species in the subject site as well as in the wider LIA site.

Recommendation: Notwithstanding the provision of the Tree Report, and in view of the fact that the Report was prepared around 2 years ago, Council's Landscape Officer advises that maximum tree retention should be promoted through, but not limited to, the following:

- An up-to-date Vegetation Assessment should be undertaken for the site and surrounds.
- All mature trees within and along the Bundock Street frontage are to be located on a survey and in relation to the proposed residences. In this regard, there are several existing large trees along Bundock Street and scattered through the site including a large mature pine tree on the site which is visible from Bundock Street. All healthy mature trees should be strictly retained in the front gardens, open spaces, and nature strips of the site. The need to preserve existing mature trees is a major expectation of the community in the locality.
- The retention of existing native trees is consistent with the landscaping controls in Section 4.1 of the RDCP 2013 Defence Site Masterplan which require the use of local native plant species.
- Street tree selection and design of tree surrounds must be to Council's specification.
- To offset the loss of tree removals, a tree replacement plan consisting of a ratio of 5 new trees for every tree removed shall be developed. Any trees that cannot be planted within the proposed development shall incur a street tree planting fee of \$1,765 per tree in accordance with council's fees and charges.

Biodiversity and environment

Council notes that a Biodiversity Impact Assessment prepared by Jacobs for the housing redevelopment site (that is, excluding the wider area of the Defence site that was previously proposed for the LIA). The BIA states that it was undertaken in line with the provisions of the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and NSW Biodiversity

Conservation Act 2016 (NSWBC Act); involved database review, habitat assessment, site inspection, vegetation survey and general survey of the subject site. In particular, the BIA recognises that Defence's key environmental obligations fall under the Commonwealth EPBC Act.

It is noted that the BIA finds that the redevelopment would result in minor, if no, impacts on threatened species marginal habitat for MNES and other NSW listed threatened species. Additionally, there will be removal of native and non-native vegetation including: - 0.08 ha of NSW PCT 4028 Estuarine Swamp Oak Twig-rush Forest, however, these are assessed to be in low condition. There will also be 2.62 ha of other native and exotic planted and regrowth vegetation.

Recommendation: Notwithstanding the findings of the BIA and Tree Assessment, Council's Bushland Officer, has requested that permission be granted for access to the subject site for the purposes of a flora survey to inspect for the *Acacia terminalis* and other indigenous plant species. Council requests that Defence makes the necessary arrangements for this access to be provided. Council also notes that Appendix E of the Biodiversity Impact Assessment, the General Fauna Assessment, includes an onsite recording of a Grey-headed Flying-fox (MNES listed) in the two-day field study. However, the main body of the BIA concludes that there were no Grey-headed Flying-foxes observed onsite. Council requests this apparent contradiction be clarified.

Thank you for the opportunity to provide a submission on the Bundock Housing Redevelopment project. If you have any questions regarding issues raised in this submission, please contact David Ongkili, Coordinator Strategic Planning, on 9093 6793 or David.ongkili@randwick.nsw.gov.au

Yours sincerely



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