

21 July 2010

Commercial-in-Confidence

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Dear John,

Visual Assessment of Proposed Orica Villawood Remediation Project at 2 Christina Road, Villawood NSW

1.0 Introduction

AECOM Australia Pty Ltd was commissioned by Thiess Services Pty Ltd to conduct an assessment of the potential visual impacts of the proposed Orica Villawood Remediation Project, as part of the preparation of an Environmental Assessment (EA) for the Project under Part 3A of the *Environmental and Planning Assessment Act 1979*. The Project Area is located at 2 Christina Road, Villawood, NSW ('the Project Area' - Lot 1, Plan Number 634604) and was the former site of a chemical manufacturing facility. The proposed Project involves the remediation of contaminated land and groundwater in the Project Area using thermal treatment methods, requiring the construction and use of onsite treatment buildings and plant.

The Director-General's Environmental Assessment Requirements (EARs) for the EA were issued by the Department of Planning on 12 May 2010, requiring that a visual assessment be undertaken for the proposed Project in the following terms:

Visual – The EA must include an assessment of the visual impact of the treatment facility (height, scale and lighting) and the local and regional area, particularly on any adjoining landowners and significant vantage points in the public domain.

The purpose of this visual assessment is to determine the likelihood and severity of potential impacts of the proposed remediation Project on the visual amenity of land uses surrounding the Project Area and, as appropriate or necessary, to identify safeguards to mitigate potential impacts. This visual assessment involved:

- a desktop review of existing aerial images of the Project Area;
- an inspection of the Project Area and surrounding land uses;
- identification of existing view lines into the Project Area;
- assessment of potential impacts of the proposed Project on local visual amenity; and
- development of recommendations to mitigate potential impacts.

Due to the 24hr operation of the proposed Project, this assessment has also considered the Australian Standard '*Control of the Obtrusive Effects of Outdoor Lighting*' – AS428 –1997, which outlines assessment considerations for the potential effects of outdoor lighting.

2.0 Project Area Description

The Project Area is approximately 12.5 hectares and is situated in the industrial area of Villawood, adjoining the suburb of Chester Hill. Since the 1940s the Project Area has been used for industrial manufacturing of munitions, chemicals and pharmaceuticals. In 2000 the site was closed and the majority of buildings were demolished.

At present, there are a number of buildings which remain on the Project Area, including a large warehouse on the former pharmaceutical site in the south-west corner of the property, a two-storey steel effluent treatment plant near to the centre of the Project Area, a laboratory in the south of the Project Area, site offices and amenities in the south-west corner of the Project Area and a large concrete and steel building ('Packing Store No. 5') currently housing contaminated soil in the north-east. Former roads and areas of concrete remain on the Project Area,

along with subsurface utilities, above-ground tanks, an electrical substation, manhole covers and stormwater drains, waste drums, building foundations and demolition rubble.

The topography of the Project Area falls from the north-east corner to the south and south-west, with a change in elevation of approximately 6m.

Surrounding Land and Land Uses

The area immediately surrounding the Project Area, and the Villawood region, is used primarily for industrial and commercial purposes. To the immediate east of the Project Area is the Abbott Industrial Estate at 152 Miller Road, which houses several small industrial premises.

Christina Road runs along the southern boundary of the Project Area, beyond which are several commercial businesses including a kitchen supplier and fitter, furniture and clothing outlets, a car repair workshop, a cheese producer and a pool supplies warehouse. These premises back onto the Bankstown/Inner West commuter railway line.

To the immediate west of the Project Area are more commercial/industrial outlets such as Woodland Home Products, while along the north-west boundary is the PPG Architectural Coatings complex which includes the Taubmans factory and industrial manufacturing plant. **Photograph 1** below is taken from the north-east of the Project Area looking west to the angular-roofed Taubmans buildings.

Industrial and commercial factories and warehouses dominate the landuse to the immediate north of the Project Area (adjacent to the north-eastern boundary is a large warehouse occupied by Wridgways Removalists), while the Department of Immigration Detention Centre is located several hundred metres further north.

The closest residences to the Project Area are approximately 100 metres to the north-east, on the eastern side of Miller Road at Chester Hill. A sports field is also located on Miller Road, to the east of the Project Area. Approximately several hundred metres to the north-east of the Project Area is Chester Hill High School.

The Project Area is approximately 14 kilometres to the north of Bankstown Airport.

3.0 Proposed Development

The proposed Project involves the remediation of contaminated land and groundwater in the Project Area using thermal treatment methods. The proposed Project involves the excavation of soils, the establishment of decontamination facilities on site and a number of ancillary works. Specifically, these works include:

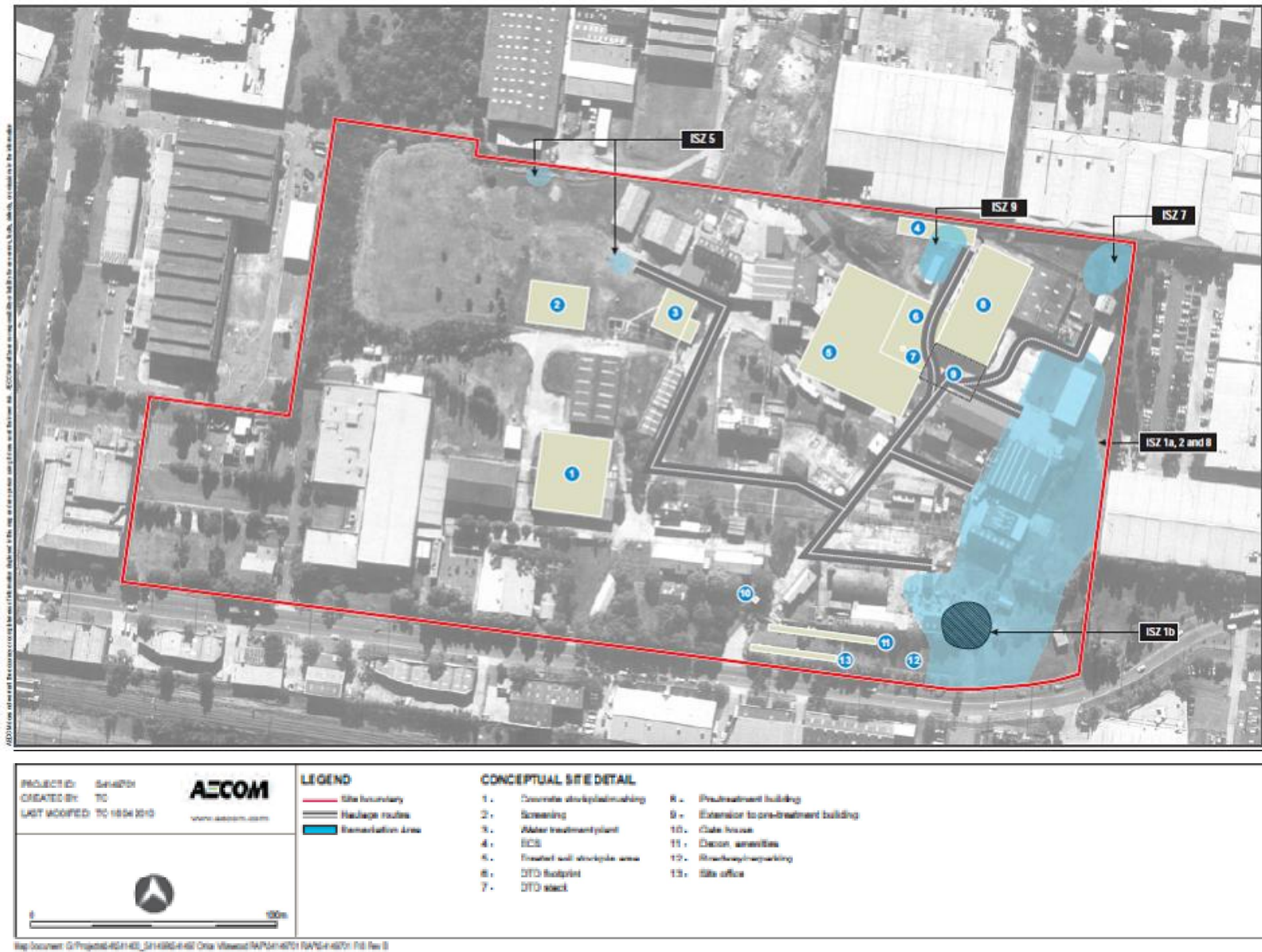
- Establishment of decontamination stations and a Water Treatment Plant (WTP), approximately 15 x 20m;
- Assembly of directly-heated Thermal Desorption (DTD) Plant and equipment, approximately 20m x 20m and some 8m high;
- Construction of a Pre-Treatment Building (PTB), approximately 20 x 40m and some 8m high, and associated Emission Control System (ECS) and sealed hardstand adjacent to the PTB;
- Construction of internal haul roads along former site roads and using existing gates and driveways into the Project Area;
- Progressive excavation of contaminated soils from the Remediation Zones;
- Screening of oversize excavated materials (as required);
- Transport of the excavated materials from the Remediation Zones to the PTB (as required);
- Stockpiling and/or potential offsite removal of some excavated materials;
- Treatment of soils within the DTD Plant;
- Progressive validation of the treated soils and Remediation Zones;
- Backfilling of the validated Remediation Zones after completion of the excavation and treatment works;
- Final reinstatement and finishing of the Remediation Zones; and
- Fencing and augmentation of existing site offices.

The site layout for the proposed Project is presented in **Figure 1**.

Photograph 1: Project Area and Adjacent Property to the West



Figure 1: Site Layout for the Proposed Project



Assumptions Regarding Proposed Development

For the purposes of this visual assessment, the following assumptions have been made:

- The proposed Project is anticipated to be undertaken over a period of approximately 18 months, including all phases of site establishment, pre-treatment, treatment, validation, decommissioning and reinstatement.
- Construction and demobilisation hours are expected to be between the hours of 7am and 6pm Monday to Friday, and 7am to 1pm Saturdays. On Sundays and Public Holidays, no construction or demobilisation work would occur. Operation hours for excavation activities would occur between 7am and 5pm six days per week. Operation hours for the PTB and DTD plant would be 24 hours per day, seven days per week.
- Two stacks would be constructed as part of the remediation facilities, including a DTD Plant stack with a maximum height of 30 metres and an ECS stack with a maximum height of 21.5 metres. The stacks would be constructed adjacent to the PTB in the north of the Project Area, as shown on **Figure 1**.
- Safety lighting would be installed on the outside of all proposed buildings at around ten metre intervals while street lighting would be installed along internal haul roads and would be lit 24 hours a day, seven days per week for safety and security reasons.
- Existing vegetation on the Project Area boundary would remain for the duration of the remediation construction, operation and decommissioning works.

4.0 Existing Visual Environment

Site Inspection

An inspection of the Project Area and surrounding land uses was undertaken on Thursday 24 June 2010 by two AECOM environmental scientists. The inspection involved a walkover of the Project Area to assess the visibility of surrounding land uses from inside the property boundary, as well as an inspection of the Project Area from various vantage points in the surrounding area. A further objective of the site inspection was to determine the existing character of the local area and the ability for it to visually absorb the physical elements of the proposed Project.

Existing Visual Environment

The existing visual environment in the immediate vicinity of the Project Area is typical of a light industrial and commercial area. Visual elements of the landscape include large, unarticulated buildings of brick, pre-cast concrete and/or steel construction and include factories and warehouses with limited windows, and large expanses of hard-stand delivery areas and car parks. Commercial premises close to the Project Area are predominantly one to two storeys in height, with the majority of windows facing Christina and Miller Roads being either obscured by advertising or drawn blinds. A number of cement stacks in the region are clearly visible in the distance, for example to the south-west of the Project Area, standing tall above the surrounding warehouses. Prior to 2000, the Project Area similarly consisted of warehouses, factories and office buildings of various sizes, some of which are still present on the Project Area and obstruct views into the property.

The area is characterised by road transport with limited pedestrian traffic and it is most likely that viewers of the Project Area pass only temporarily, as either vehicular drivers or passengers.

The Project Area is currently enclosed by a 2 metre high wire mesh fence covered in green shade-cloth which obstructs some views into the property. Trees and vegetation span most of the southern boundary along Christina Road, which generally screens the Project Area from the road and adjacent businesses. It is assumed that vegetation on the property would remain throughout the proposed Project.

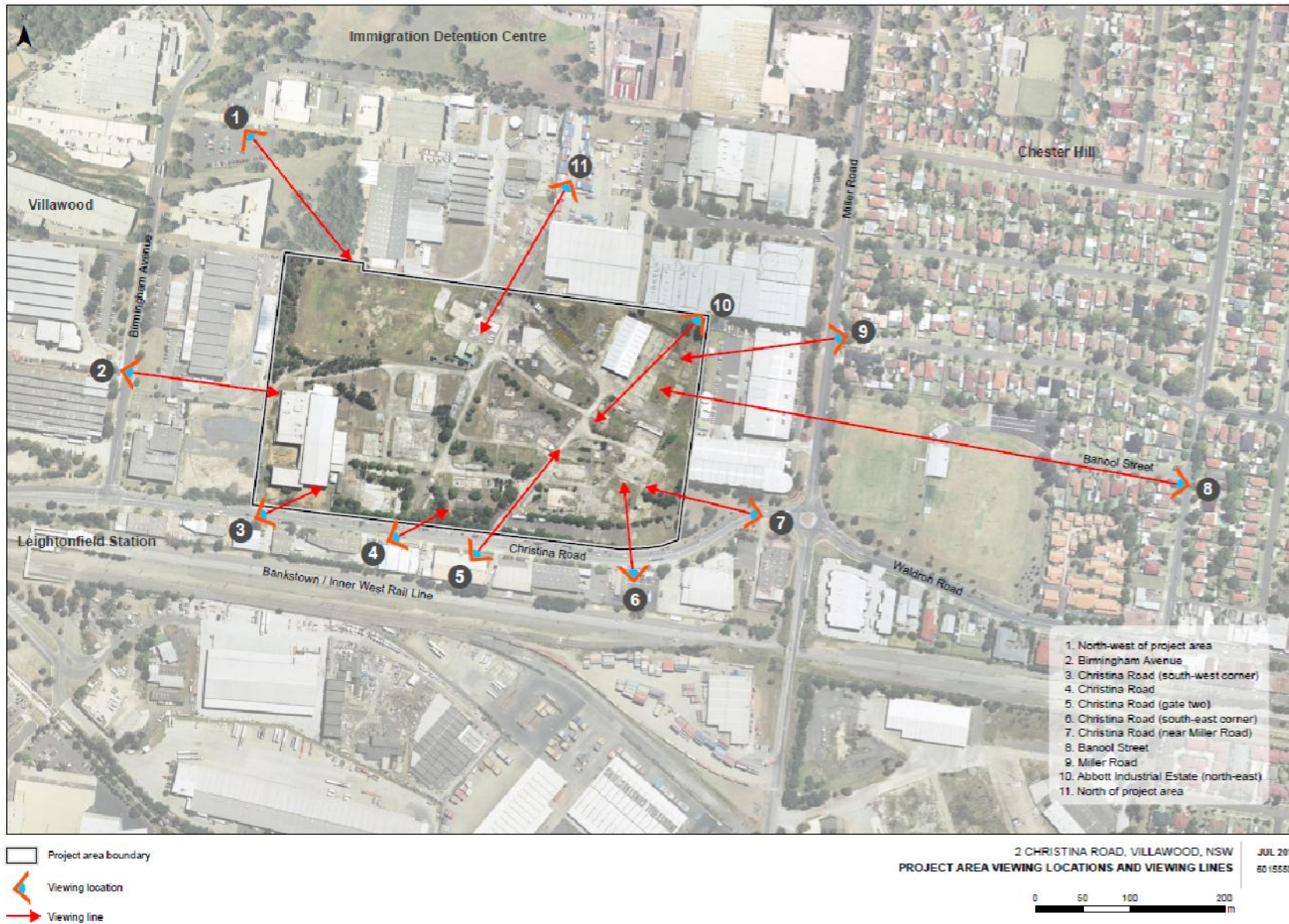
Viewing Locations

During the site inspection, the Project Area was viewed from all accessible directions and viewpoints in the surrounding properties and streets, with photographs taken at each point to record the visibility of the Project Area from external vantage points. The viewing locations from which the visual impact assessment of the proposed Project was conducted are outlined as follows.

The 11 assessed locations include views of varying depth from the north, south, east and west of the property. Eight viewing locations were from roads surrounding the property (Christina Road, Miller Road and Birmingham Avenue), adjacent businesses and locations close to nearby residences were visited to determine the potential impact from the proposed remediation works. The nine locations are shown on **Figure 2** and include:

1. North-west of Project Area
2. Birmingham Avenue
3. Christina Road (south-west corner)
4. Christina Road
5. Christina Road (gate 2)
6. Christina Road (south-east corner)
7. Christina Road (near Miller Road)
8. Banool Street
9. Miller Road
10. Abbott Industrial Estate (north-east)
11. North of Project Area

Figure 2: Project Area Viewing Locations and Viewing Lines



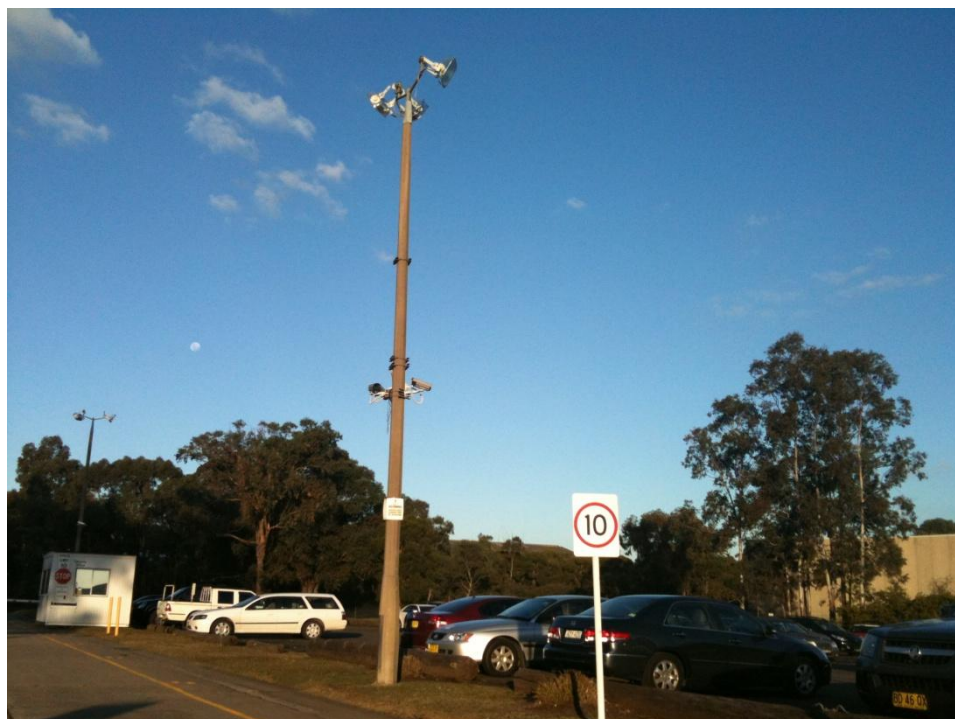
5.0 Visual Assessment

The visual assessment was undertaken based on the 11 representative viewing locations identified above. The potential view lines to the Project Area from these locations have been considered as part of the assessment.

1. North-west of Project Area

A potential viewpoint was identified several hundred metres north-west of the Project Area, however during the site inspection it was established that this location did not have a view to the Project Area. Dense vegetation and existing buildings obstructed the view line to the area (as seen in **Photograph 2**). Due to the topography of the land, the DTD and ECS stacks would be situated on higher ground than this viewing location. At their height, the stacks have the potential to be visible from viewpoint 1, however would be positioned in the background of the visual envelope of the area. Additionally, viewers of the stacks from this location are most likely to be sighting the view for only a short period as they walk to and from the car park. The buildings in the vicinity of this viewing location face west onto Birmingham Avenue away from the Project Area.

Photograph 2: View Line from Viewing Location 1



2. Birmingham Avenue

No view to the Project Area was apparent from Birmingham Avenue as the view is blocked by the commercial premises along the entire length of the road. Where setbacks between buildings occur towards the southern end of the street, these views are blocked by the long warehouse structure in the south-eastern section of the Project Area.

3. Christina Road (south-west corner)

For road users driving in an easterly direction along Christina Road, the visibility of the Project Area is reduced by the warehouse and vegetation in the south-western corner of the Project Area, as can be seen in **Photograph 3**.

Photograph 3: View Line from Viewing Location 3



4. Christina Road (south)

Limited glimpses of the Project Area are visible from road users and industries along the southern side of Christina Road. Vegetation obstructs the majority of the Project Area as can be seen in **Photograph 4**.

Photograph 4: View Line from Viewing Location 4



5. Christina Road (east - Gate 2)

Views to the Project Area through Gate 2 on Christina Road, as seen in **Photograph 5**, offer the least obstructed view of the Project Area from an external point. When the gates are open, views are possible along the length of the main road on site, which would be used as part of the internal haul route for trucks once works commence. This road leads to the PCB and would be lit by street lights during the 18 month construction and remediation period.

However, as the proposed internal haul road is perpendicular to Christina Road, views to the Project Area and night-time lighting are unlikely to be of significant impact for passing motorists. Although the commercial businesses opposite (Queen's Kitchens and Wood World Furniture) face Gate 2, the potential impact on these properties is considered to be minimal as the viewing line is narrow. On either side of Gate 2, the vegetation screen would block the majority of the view of the structures and works on site.

Photograph 5: View Line from Viewing Location 5



6. Christina Road (south-east corner)

Observing the Project Area from this viewing location provides one of the most direct and unobstructed views of a portion of the Project Area, as demonstrated in **Photograph 6**.

Photograph 6: View Line from Viewing Location 6



Due to the rise in topography from Christina Road up to the northern boundary of the Project Area, a large portion of the property is visible from the road. Visible is the current soil storage warehouse (and proposed PCB) located in the north of the property. Due to the lack of vegetation along this portion of the boundary, the view is unobstructed. From this viewpoint, the proposed stacks would be highly visible as would the treated soil stockpile area and trucks travelling along the internal haul roads. Night-time lighting would also be visible from this position.

Potential viewers at this location, however, are limited to passing motorists and persons attending the adjacent commercial businesses.

7. Christina Road (near Miller Road)

Motorists travelling westbound along Christina Road from Miller Road approach the Project Area directly before the road bends south around the south-west corner of the property. View lines into the Project Area are however partially obscured by the small earth mound and landscaping in the foreground which obstructs a majority of the Project Area in the background (see **Photograph 7**).

Photograph 7: View Line from Viewing Location 7



8. Banool Street

This viewing location is approximately 300 metres east of the Project Area. At present, no view of the Project Area is gained from this location due to the buildings within the Abbott Industrial Estate impeding the scene, as shown in **Photograph 8**. Due to the similar elevation of the Project Area to the viewing location, however, the stacks proposed as part of the Project are likely to be visible from this point, though in the background of the scene.

Photograph 8: View Line from Viewing Location 8



9. Miller Road

This viewing location is from the closest residences to the Project Area on the eastern side of Miller Road. The view line can be seen in **Photograph 9**.

Photograph 9: View Line from Viewing Location 9



In the foreground are commercial buildings within the Abbott Industrial Estate, on the western side of Miller Road, which block the view of the Project Area from these residential premises. The upper portion of the proposed stacks would be visible from this aspect, though they would be in the background of the view line, the diminishing height of which would be comparable to the height of the mature trees in the mid-distance.

10. Abbott Industrial Estate (north-east)

Looking onto the Project Area from a north-easterly direction would be possible from the rear car-park of the Abbott Industrial Estate only, as existing industrial buildings on an adjacent property block the view beyond this point. **Photograph 10** shows a view of the north-eastern corner of the Project Area, while **Photograph 11** illustrates the rear brick wall of industrial buildings to the north-east.

Photograph 10: View Line from Viewing Location 10



From this point the remediation development would be highly visible through the existing wire and shade-cloth fencing, particularly the proposed stacks, the excavations and the western side of the soil storage warehouse, seen in the mid-distance. Viewers of the Project Area from this angle, however, are few and would be limited to persons parking in the Estate during the hours of operation of the adjacent premises.

Photograph 11: Back Wall of Adjacent Property



11. North of Project Area

This viewing position was located to the north of the Project Area at the industrial estate containing Wridgways Removalists, at 14 Epic Place. The rear of the storage warehouses on this property face the Project Area such that employees on this site are unlikely to view the proposed Project. From the side of the Epic Place property, looking in a south-westerly direction, the Project Area was visible in the mid-distance, as can be seen in **Photograph 12**, beyond the Project Area boundary (marked by the wire and green shade-cloth fence). As can be seen in the foreground, the Epic Place property boasts similar light industrial infrastructure, such as tanks and containers, to that of the Project Area and similar to the structures and storage facilities to be used in the remediation Project.

Photograph 12: View Line from Viewing Location 11



6.0 Potential Visual Amenity Impacts of the Proposed Project

6.1 Visual Assessment Criteria

Visual absorption capacity refers to the ability for an existing landscape to absorb a new development without heavily impacting on the present visual envelope of the area. The visual absorption capacity of an area can be determined by comparing the visibility of the development and characteristics of an existing area (see **Table 1** below). Visibility is defined as the extent to which the proposed development would be visible from surrounding areas.

Table 1: Level of Visual Impact

	Visibility		
Visual Absorption Capacity	Low	Moderate	High
High	Low	Low-Moderate	Moderate
Moderate	Low	Moderate	High
Low	Low	Moderate	High

The visibility of the Project Area is classed as low due to the current obstructions, such as vegetation and buildings, to viewers outside the property. The ability of the surrounding area to absorb the potential visual impacts associated with the proposed works is moderate-high, due to the similar industrial and commercial land use on all surrounding properties. Considering this criterion, the Project Area is determined to have a high visual absorption capacity, and the proposed Project is likely to have a low impact on the current visual amenity of the area.

In addition, the duration of the proposed remediation works is for a period of only 18 months, further limiting the potential visual impacts on the surrounding area.

6.2 Proposed Structures

The proposed Project would utilise a number of existing buildings and structures on the Project Area during the remediation works. The augmentation of these existing buildings and construction of new treatment facilities would however be of a similar scale, material and height as the existing commercial/industrial buildings in the surrounding area and similar to the structures that were previously on the site during the former use of the Project Area as a pharmaceuticals, munitions and agricultural chemicals plant. The structures and storage facilities required for the remediation Project, such as tanks, warehouses and containers, would be similar in type and scale to the light industrial infrastructure observed on surrounding properties.

The proposed Project requires the construction of two stacks of around 21.5 and 30 metres in height which are expected to be visible from a number of viewing locations and, due to the relative elevation of the Project Area, potentially visible from surrounding districts. The view of the majority of the stacks would be obscured by surrounding buildings and vegetation in the foreground, while the visible portion would be in the mid-distance and distance from a number of vantage points. Additionally, the stacks would be consistent with similar stack structures observed in the area.

As such, although a number of the structures of the proposed Project would be partially visible from the public domain, particularly the PTB, treatment plant and stacks, the visual impact from these structures is expected to be low due to the small number and type of potential viewers, the consistency with surrounding land uses, and the high visual absorption of the area.

6.3 Lighting

The Project Area is currently lit at night for security reasons. The proposed Project requires the use of lighting installed on site buildings and on poles along internal haul roads for work safety and security purposes. The Project would be in operation up to 24 hours per day, 7 days per week for a temporary period of up to some 18 months. The lighting expected to be used on the Project Area is likely to be consistent with existing forms of security and street lighting in the surrounding industrial areas, and would be similar to the lighting previously generated on the site during the former operation of the chemical manufacturing facilities.

Australian Standard AS428 *Control of the Obtrusive Effects of Outdoor Lighting–1997* provides guidance for the assessment and control of the likely effects of developments that involve the provision of outdoor lighting on nearby residents, users of adjacent roads, on transport signalling systems and on astronomical observations.

The works and associated lighting proposed for the Project have been considered with regard to these elements of AS428-1997 as follows.

Residents

As no direct view lines exist to the Project Area from the nearest residential areas of Chester Hill, to the north-east, lighting of the work is unlikely to be intrusive nor impact the windows of habitable rooms.

The airspace above the Project Area is likely to be somewhat illuminated at night during remediation and may be observable within the local area, however direct light spill or glare to residential areas is not expected due to the separation to this land use by distance and the screening afforded by existing commercial buildings. This illumination would have a lesser effect on nearby residents, for example, than the night flood-lighting of Abbots Oval to the east of the Project Area on Miller Street.

Road Users

Motorists using the public roads surrounding the Project Area generally travel parallel to the property boundaries such that the proposed lighting installations are unlikely to impact on driver navigation. However, at the eastern end of Christina Road, to the west of the roundabout with Miller Road, westbound motorists approach the Project Area directly before a bend in the road, and may be impacted by night-time lighting.

As outlined previously, a small earth bund and vegetation exist and would partially block this view line at location 7, however a moderate navigational hazard may still exist to motorists due to proposed work area lighting in the background and oncoming headlights of onsite excavators and trucks. Further screening of light from this boundary of the Project Area may therefore be required.

Rail

The Bankstown/Inner West railway line runs in a straight line, parallel to Christina Road, approximately 70 metres to the south of the Project Area. As trains do not approach the Project Area directly and due to the presence of existing visual obstructions such as buildings and vegetation between the Project Area and the rail line, the proposed Project lighting is unlikely to interfere with the illumination of signalling lights associated with the railway line, nor would the ability for train drivers to see essential details of the route ahead be reduced as a result of the proposed Project.

Airports

The Civil Aviation Safety Authority (CASA) provides general guidance for situations where lights are to be installed within a 6 km radius of the airport as lights within this area are considered most likely to cause confusion, distraction or glare to pilots. As the Project Area is located approximately 14 kilometres north of the Bankstown Airport and as the temporary lighting intended for the Project Area is not expected to be so bright as to cause skyglow (i.e. a general luminous glow caused by the scattering of light in the atmosphere), it is unlikely that the lighting proposed for the Project will impact on pilot navigation.

The Project Area may, however, be within the 'Inner Horizontal' Obstacle Limitation Surface (OLS) for the Bankstown Airport as defined in their 2010 Master Plan. CASA has advised that safety lighting of tall structures is required if the height of the structure will be greater than RL51m.

It is understood that the Project Area, at the location of the proposed ventilation stacks, has a height of RL36m, which, when combined with a proposed stack height of 30m, means that these structures may penetrate the OLS. CASA has advised that following approval of the proposed Project, an application is to be made with Bankstown Airport Limited to determine its relationship with the OLS and the requirements for lighting or marking of structures. This application is to detail the location and final height of the proposed stacks, and will be forwarded to CASA for determination of the required safety measures. Similarly, an application would be required to be made for any crane or other equipment to be used onsite during the construction of the Project, which has a total height greater than RL51m.

Early advice from CASA has indicated that low intensity steady red lights may be required atop the two proposed stacks and/or red and white banding of their top portions to aid in local aircraft safety during the day. Similar recommendations are likely to be given for the use of tall cranes onsite during construction if deemed necessary during the application process.

Observatories

The Astronomical Society of Australia has been asked by Standards Australia to maintain a list of "designated" optical observatories deserving of protection from obtrusive lighting ("light pollution"). A review of the Society's website did not identify an observatory in the vicinity of the Project Area or local to the Villawood area. However, it should be noted that the Project Area would not contribute a large addition to skyglow or light diffusion in the atmosphere, considering the presence of other lights in the area.

7 Summary and Recommendations

The visual impacts associated with the proposed Project are considered to be low. The Project Area has low visibility due to existing structures on and near the Project Area obstructing views into the property. Moderately dense vegetation along the length of Christina Road provides an additional screen, blocking the views of commercial residences opposite the Project Area. Additionally, most external viewers of the development would be temporary and would only sight the Project Area briefly when passing by foot or in vehicles.

The most unobstructed view lines onto the Project Area are from the Taubmans property adjacent to the Project Area in the north. However the structures on this property which face the Project Area are solid walls limiting the visual effect of the proposed development to employees or visitors on the Taubmans site. The proposed development would therefore not affect the privacy of the adjacent properties. The vegetation along Christina Road ceases at Viewing Location 6 which also provides a clear view of the Project Area from which the proposed Project would be visible. The visual impact from this location is lessened due to the fact that most viewers would be travelling along Christina Road parallel to the Project Area at this point and would not be directly drawn to the view of the property.

The local area boasts a high visual absorption capacity as elements of the proposed Project are consistent with former structures and activities on Project Area, and the light industrial character of the surrounding area and district. Further, the short duration and temporary nature of the proposed remediation works will limit any potential visual impacts on the surrounding area. Consequently, the proposed development is not expected to be visually offensive to viewers nor have a high visual impact.

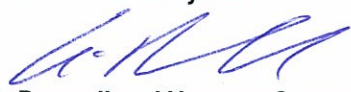
Safety and security lighting of buildings and street lighting of internal haul routes would be consistent with other industrial and street lighting in the local area and is not likely to have detrimental impacts on the surrounding environment. An exception exists where a potential moderate impact to motorist navigation may be expected at the eastern bend of Christina Road.

The following safeguards have been identified in accordance with AS428-1997 to mitigate potential impacts and avoid the potential for offense to local visual amenity:

- Select suitable colours and materials for proposed structures in keeping with warehouses and factories of the local area to minimize reflectivity and contrast.
- Ensure lighting is directed away from sensitive receptors, is task specific with regard to illumination and incorporates shielding to reduce light spillage, glare and skyglow.
- Augment existing barriers to light spill in the south-east corner of the Project Area near Viewing Location 7, for example by increasing the height of the earth mound, installing a solid fence or increasing the amount of vegetation along the Project Area boundary.
- Assess the proposed lighting installations for compliance with appropriate lighting and safety standards.
- Prepare and submit an application with Bankstown Airport Limited to determine the type of safety lighting and/or marking required atop the proposed stacks or tall construction machinery, to mitigate against potential safety impacts for pilots.

Yours sincerely,

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