

ESR Australia
Level 29, 20 Bond Street
Sydney NSW 2000

Project 86826.04
14 February 2022
86826.04.R.002.Rev0
DIH

Attention: Daniel Galea

Email: daniel.galea@esr.com

**Response to Information Request
Proposed Warehouse Development
Lot 204 (formerly Lot 203), 12 Johnston Crescent, Horsley Park**

Douglas Partners Pty Ltd (DP) provides the following comments to assist ESR Australia (ESR) in responding to a request for further information from the NSW Department of Planning and Environment (DPE) for the proposed development at Lot 204 (formerly Lot 203) Johnston Crescent, Horsley Park.

The DPE letter correspondence titled '*ESR Horsley Logistics (SSD-10436-Mod-4) Modification Report*' dated 7 February 2022, requests the following from ESR with respect to contamination related matters:

- Clarify and provide evidence which remediation action plan (RAP) has been relied upon;
- Submit a site audit statement;
- Have a suitably qualified person assess the potential risks of exposing residual contaminants, how this will be managed and any implications for the approved RAP and site audit statement (SAS); and
- Provide details of any necessary mitigation measures.

DP was provided the following reports authored by the Site Auditor, James Davis of Enviroview Pty Ltd:

- Enviroview Pty Ltd, '*NSW Site Audit Scheme, Site Audit Statement*', Site Audit Statement No, 0301-2010 Enviroview ref: 600105_0303-210 dated 25 October 2021 (Enviroview 2021a); and
- Enviroview Pty Ltd, '*Site Audit Report, Lot 204 in DP 1265921 (Stage 2B), 12 Johnston Crescent, Horsley Park, NSW, Prepared for CSR Building Products Limited*', Enviroview ref: 600105_0303-210 dated 25 October 2021 (Enviroview, 2021b).

Section 7 of Enviroview (2021b) outlines the remediation approach. In summary, the remediation strategy for the broader redevelopment area (of which Lot 204 formed part) was initially presented in a 2014 RAP reported by David Lane and Associates Pty Ltd (DLA) and was subsequently refined

though addendums and revisions to the RAP. This was then supplemented by an ERM RAP and addendum to the RAP. These three reports are listed as follows in Section 15 of Enviroview (2021b):

- DLA. (December 2014). *Remediation Action Plan, 327-335 Burley Road, Horsley Park NSW 2175. Reference 0449086_S008491, dated June 2018;*
- ERM. (December 2018). *Addendum to Remediation Action Plan: Bund Wall Remediation Strategy, 327-335 Burley Road, Horsley Park, NSW 2175. Reference 0449086_S009295, dated 7 December 2018;* and
- ERM. (December 2019). *Remediation Action Plan, 327-335 Burley Road, Horsley Park NSW 2175. Reference S010173, dated 20 December 2019.*

Reference should be made to the Enviroview reports for further information on the RAPs and how these have been used and relied upon by for the remediation works/SAS. In summary, the remediation approach involved remediation of all contaminated soils to acceptable concentrations consistent with a commercial/industrial land use.

Moreover, ERM Services Australia Pty Ltd (ERM) letter titled '*Subject: Notice of Completion Work and Consent Condition Compliance Certification – Stage 2B, Horsley Park, NSW*', ERM ref: 0449086_S010914 dated 18 June 2021 (ERM, 2021) outlined that remedial works have been completed on the site. It also notes that all works methods procedures, control measures and recommendations have been carried out in general accordance with the DLA (December 2014).

In summary Enviroview (2021a), Enviroview (2021b) and ERM (2021) indicate that the RAPs have been implemented and the objectives of the remediation achieved through rendering the site suitable for a commercial/industrial land use, consistent with ESR's proposed warehouse development.

It is noted that there are no on-site contamination related mitigation measures associated with the remedial works (e.g., a clean cap with contaminated soils encapsulated at depth). In this regard, the environmental management plan (EMP) included in the Enviroview reports is associated with the maintenance and monitoring of the Camide Landfill located approximately 230 m to the west of the site. DP understands that this EMP is being issued to all lots as part of the broader CSR redevelopment as remediation works are completed.

The proposed development includes lowering the site by approximately 3-4 m as part of the bulk excavation to achieve the building pad level. Given there are no on-site remediation mitigation measures and remediation works have been undertaken to render the site suitable for a commercial/industrial land use, as indicated by the Enviroview and ERM reports, DP considers that the contamination exposure profile for the proposed development will not be altered by the amended (lowered) bulk excavation level.

Notwithstanding, to address any residual contamination that may be encountered during works, DP would recommend, as with all projects, the implementation of an unexpected finds protocol (UFP) and associated contingency plan. This should be incorporated into the site management plans (e.g., the construction environmental management plan). An example of a basic UFP and contingency plan is outlined below.

Contamination Unexpected Finds Protocol

All site personnel are to be inducted into their responsibilities under the UFP.

All site personnel are required to report unexpected signs of environmental concerns to the Site Manager if observed during the course of their works e.g., presence of unexpected asbestos containing material (ACM), petroleum, or other chemical odours, unnatural staining, potential contamination sources (such as buried drums or tanks) or chemical spills.

Should signs of concern be observed, the contractor is to, as soon as practical:

- Place barricades around the affected area and cease work in that area. Covering of the surface with a geofabric or similar is also to be undertaken, where required;
- Notify authorities needed to obtain emergency response for any health or environmental concerns (e.g., fire brigade);
- Notify the Principal's Representative of the occurrence;
- Notify any of the authorities that the Contractor is legally required to notify (e.g., NSW EPA, Council); and
- Notify the Environmental Consultant.

ESR's representative is to notify any of the authorities which the Principal is legally required to notify (e.g., EPA, Council).

Following the immediate response in the UFP a contingency plan is to be implemented.

Contamination Contingency Plan

The contingency plan for the site is as follows:

- The Environmental Consultant (or Occupational Hygienist as appropriate) to inspect the issue of concern and determine the nature of the issue and the appropriate approach to assessing or (if appropriate) managing the issue;
- The Environmental Consultant (or Occupational Hygienist as appropriate) to undertake an assessment considered necessary to determine the management strategy for the area;
- If contamination is found and remediation action is considered necessary, a remediation strategy for the area is to be prepared by the Environmental Consultant; and
- If the area or proposed remediation strategy is significantly different than the works already proposed, the Consent Authority or Private Certifier (as appropriate) is to be provided notification of the proposed works.

DP recommends submission of the SAS (Enviroview, 2021a), the site audit report (Enviroview, 2021b) and the ERM notice of completion of remediation works (ERM, 2021) to DPE to assist with clarifying the information requests.

Please contact the undersigned if you have any questions on this matter.

Yours faithfully
Douglas Partners Pty Ltd



David Holden
Associate

Reviewed by:



Paul Gorman
Principal

Limitations

Douglas Partners Pty Ltd (DP) has prepared this report for this project at Lot 204 (formerly Lot 203), 12 Johnston Crescent, Horsley Park in general accordance with DP's proposal 86826.03.P.001.Rev1 dated 27 October 2021 and acceptance received from ESR Australia dated 2 December 2021. The work was carried out under DP's Conditions of Engagement. This report is provided for the exclusive use of ESR Australia for this project only and for the purposes as described in the report. It should not be used by or relied upon for other projects or purposes on the same or other site or by a third party. Any party so relying upon this report beyond its exclusive use and purpose as stated above, and without the express written consent of DP, does so entirely at its own risk and without recourse to DP for any loss or damage. In preparing this report DP has necessarily relied upon information provided by the client and/or their agents. DP's interpretations and conclusions are based on the information provided being accurate. DP cannot be held liable for these interpretations and conclusions where the information provided is not accurate.

The accuracy of the advice provided by DP in this report may be affected by other items identified during further information reviews and / or variations in ground conditions across the site between and beyond the sampling and / or testing locations that have previously been reported on by others.

This report must be read in conjunction with all of the attached and should be kept in its entirety without separation of individual pages or sections. DP cannot be held responsible for interpretations or conclusions made by others unless they are supported by an expressed statement, interpretation, outcome or conclusion stated in this report.

This report, or sections from this report, should not be used as part of a specification for a project, without review and agreement by DP. This is because this report has been written as advice and opinion rather than instructions for construction.