

5 November 2021

The Trust Company (Australia) Limited as custodian for the ARET Frasers Project Trust

c/o

Paul Solomon

Planning and Infrastructure Manager

Frasers Property Industrial

Via email: [Paul.Solomon@frasersproperty.com.au](mailto:Paul.Solomon@frasersproperty.com.au)

**Supplementary Site Suitability Assessment – Ardex Development Site  
Mamre Road, Kemps Creek, NSW**

Dear Paul,

**1. Introduction and Background**

JBS&G Australia Pty Ltd (JBS&G) was engaged by The Trust Company (Australia) Limited [ACN 000 000 993] as custodian for the ARET Frasers Project Trust of Level 18, 123 Pitt Street, Sydney, New South Wales 2000 (Frasers, the client) for the provision of environmental services associated with a portion of a broad development site located west of Mamre Road as shown in **Figure 1** of **Attachment 2** (the site).

The client intends to submit a Development Application for a portion of the broader development site, shown on **Figure 1** to **Figure 3 (Attachment 2)**. Preliminary development application plans are provided as **Attachment 3**. The development application is in relation to a proposal to construct, fit out and operate a manufacturing facility and associated warehouse facility at 657-769 Mamre Road, Kemps Creek (proposed Lot 12) which will be occupied and operated by Ardex..

To support the development application, the client requires a site suitability assessment in accordance with the *State Environmental Planning Policy No. 55 – Remediation of Land*. The assessment is documented herein, with reference made to existing contamination assessments as appropriate. The assessment is made on the basis of the anticipated Secretary's Environmental Assessment Requirements (SEARs), with relevant report sections listed in **Table 1.1**.

**Table 1.1 Secretary's Environmental Assessment Requirements**

Secretary's Environmental Assessment Requirements	Report Section
<i>State Environmental Planning Policy No. 55 – Remediation of Land</i>	Statement of Site Suitability – <b>Section 3</b>
<i>Managing Land Contamination Planning Guidelines, SEPP 55 – Remediation of Land (DUAP &amp; EPA 1998)</i>	Statement of Site Suitability – <b>Section 3</b>

The broader development site, as shown on **Figure 1**, has been subject to contamination investigations as documented in JBS&G (2018<sup>1</sup>, 2019<sup>2</sup> and 2020b<sup>3</sup>). JBS&G (2019) comprised an environmental site assessment (ESA), otherwise known as a detailed site investigation (DSI) which concluded that the broader development site was considered suitable, from a land contamination perspective, for the proposed commercial/industrial development.

The broader development site has been subject to a program of earthworks since preparation of JBS&G (2018, 2019 and 2020b). An unexpected finds protocol (UFP) and an imported fill protocol (IFP) exist for the site, as documented in JBS&G (2020a<sup>4</sup> and 2021<sup>5</sup>).

## **2. Recent Site Condition**

To evaluate whether the conclusions of DSI (JBS&G 2019) pertaining to suitability of the site remained valid, JBS&G compared recent aerial imagery (5 June 2021, **Figure 3**) with an historical photograph taken at the time of the previous assessment (28 December 2018, **Figure 2**), and also completed a site inspection. Relevant details are provided in **Section 2.1** to **Section 2.3**.

### **2.1 Anecdotal Evidence**

Based on a discussion with a representative of the site operator (Joe Goonan – AWJ Civil), the broader site has been subject to earthworks. The site has been intermittently used as a tracked vehicle thoroughfare associated with the broader earthworks program. Additionally, soil test pits had been excavated within the extent of the site for the purpose of estimating the depth of soil strata. No other works were reported to have occurred within the subject site.

### **2.2 Updated Aerial Imagery Review**

A comparison of an aerial photograph of the site taken at the time of the DSI (JBS&G 2019) with a recent aerial image (5 June 2021) was undertaken to identify potential changes in the site condition. The following relevant observations were made:

- At the time of the DSI, the site was observed to be under cropping associated with the former Mamre Produce property. The site was surrounded by properties assessed as part of the DSI, which comprised generally vacant rural agricultural land. The central property (former Mamre Produce site) was used for the cultivation of crops; and
- The most recent image (5 June 2021) shows the site to be a heavily vegetated area, with overgrown grass present across the entire extent. Multiple small flattened tracks were observed in the image, and a larger vehicle track observed on a north south alignment in the eastern site portion. Earthworks and preliminary development were evident to the south and east of the site. The balance of the areas surrounding the site appeared similar to the previous aerial image, noting that demolition of previous agricultural structures had occurred.

<sup>1</sup> JBS&G (2018) Preliminary Site Investigation 657-703,707-711, 707A, 713-755 & 757-769 Mamre Road Kemps Creek, NSW 2178. JBS&G Australia Pty Ltd reference 52785/107746 Revision 1, dated 5 July 2018.

<sup>2</sup> JBS&G (2019) *Altis Property Group & Frasers Property Mamre Road, Kemps Creek Environmental Site Assessment 657-703, 707-711, 707A, 713-755 & 757-769 Mamre Road, Kemps Creek, NSW, 2178*. JBS&G Australia Pty Ltd reference 54963/120704 Revision 0, dated 27 February 2019.

<sup>3</sup> JBS&G (2020b) *Commercial Due Diligence – 657-703, 707-711, 707A, 713-755 and 757-769 Mamre Road Kemps Creek NSW*. JBS&G Australia Pty Ltd reference 59142-131483 Revision 0, dated 15 July 2020.

<sup>4</sup> JBS&G (2020a) *Imported Fill Protocol 657-769 Mamre Road, Kemps Creek, NSW*. JBS&G Australia Pty Ltd reference 58404 – 129723 Revision A, dated 3 June 2020.

<sup>5</sup> JBS&G (2021) *Unexpected Contamination Procedure 657-769 Mamre Road, Kemps Creek, NSW*. JBS&G Australia Pty Ltd reference 58404 – 129742 Revision 0, dated 26 February 2021.

### 2.3 Site Inspection

A site inspection was undertaken by Nathan Cussen on 9 July 2021. The site was observed to be relatively undisturbed since the site inspection conducted as part of the DSI. A photographic log of the site condition as observed in the DSI is provided as **Attachment 4**. The following observations are provided.

- The land was covered in long grass and maize crops; remnants of the pre-existing market gardens that once existed on site;
- A vehicle track was present dissecting the eastern portion of the site on an approximate north to south alignment;
- Test pits were present within the site, as discussed with the site operator (**Section 2.1**). The test pits exhibited a soil profile indicating approximately 0.3 m of reworked natural material present on top of residual natural ground; and
- A raised mound of soil was present on the western portion of the site, observed to be covered in dense vegetation including grass and blackberry bushes. The contents of the mound were not able to be assessed during the inspection. It was considered likely that this mound was representative of typical earthworks undertaken prior to, and reported within, the DSI assessment, comprising reworking of site material.

### 3. Conclusions and Recommendations

Based on the outcomes of the assessment, and subject to the limitations in **Attachment 1**, the following conclusions and recommendations are provided:

- Based on the recent site condition assessment undertaken (**Section 2.1, 2.2 and 2.3**), no evidence of gross and/or widespread contamination was identified at the site. No observations were made of site conditions which would indicate that the site suitability had been materially altered since preparation of the DSI.
- The site is considered suitable for the proposed commercial/industrial development; and
- It is recommended that the UFP and IFP are implemented during works to ensure that, upon completion of development works, the site remains suitable for the proposed commercial/industrial development.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email [rhammond@jbsg.com.au](mailto:rhammond@jbsg.com.au).

Yours sincerely:



Rohan Hammond  
Senior Environmental Consultant  
**JBS&G Australia Pty Ltd**

Attachments

- 1) Limitations
- 2) Figures
- 3) Proposed Development Layout
- 4) Photographic Log

Reviewed/Approved by:



Seth Molinari (CEnvP SC)  
Principal, Contaminated Land  
**JBS&G Australia Pty Ltd**

## **Attachment 1 – Limitations**

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquires.

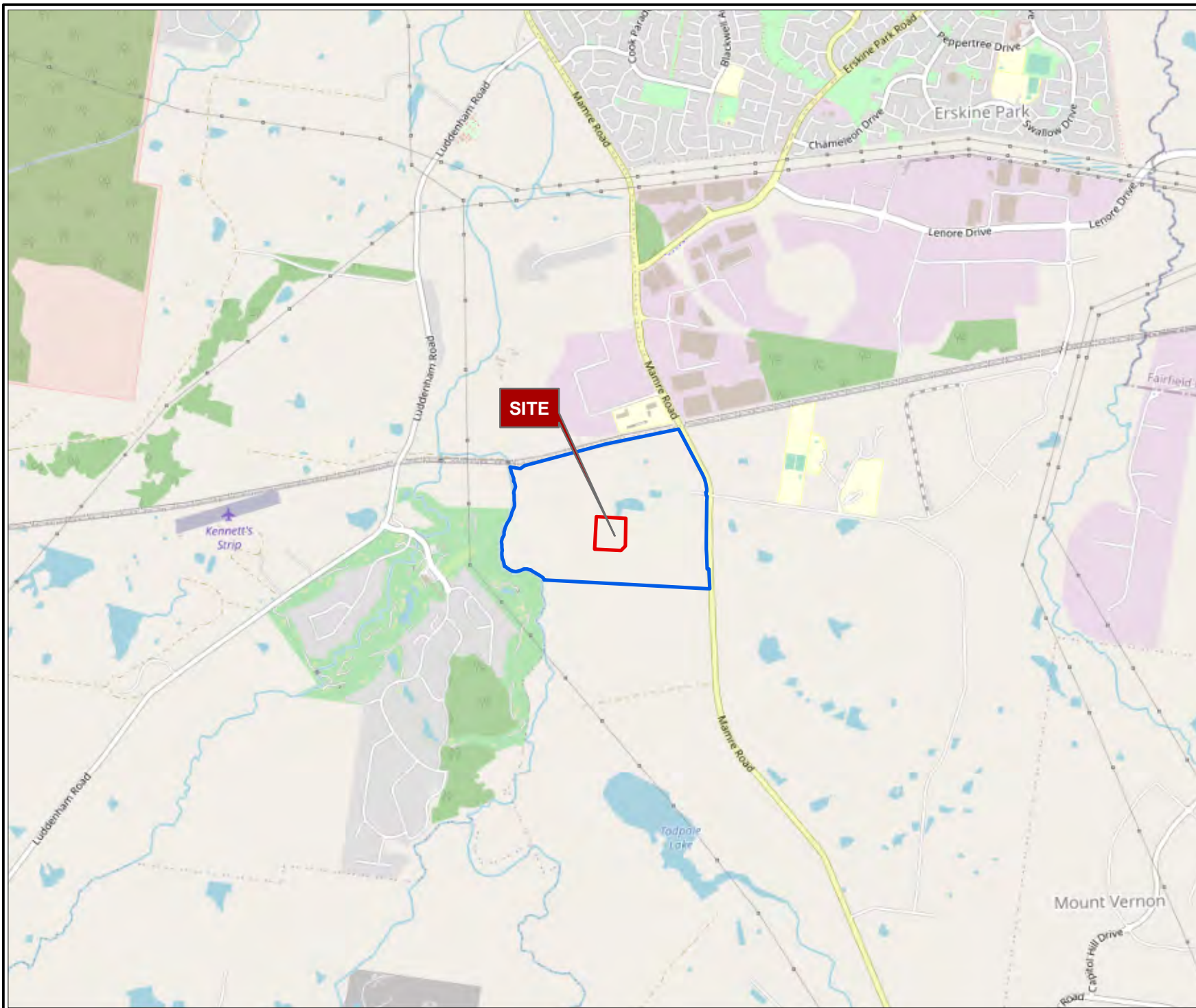
Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.

**Attachment 2 – Figures**



#### Legend

- Approximate Boundary of Broad Development Site
- Approximate Site Boundary



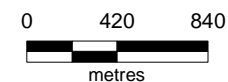
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Client: Frasers Property Australia

Version: L01 Rev A      Date 6/07/2021

Drawn By: RF      Checked By: RH

Scale 1:35,000



Coord. Sys. GDA 1994 MGA Zone 56

**Ardex Development Site,  
Mamre Road,  
Kemps Creek NSW**

**SITE LOCATION**

**FIGURE 1**



#### Legend

- Approximate Boundary of Broad Development Site
- Approximate Site Boundary
- NSW Cadastre (DFSI, 2021)
- Coordinates



Job No: 61174

Client: Frasers Property Australia

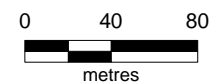
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Date 13/07/2021

Drawn By: RF

Checked By: RH

Scale 1:3,500



Coord. Sys. GDA 1994 MGA Zone 56

**Ardex Development Site,  
Mamre Road,  
Kemps Creek NSW**

**SITE LAYOUT - DECEMBER 2018**

Ardex Development Site		
ID	Easting	Northing
1	293892.686	6254165.061
2	294089.570	6254154.447
3	294087.395	6253966.576
4	294057.170	6253938.266
5	293880.972	6253947.763

**FIGURE 2**



Ardex Development Site		
ID	Easting	Northing
1	293892.686	6254165.061
2	294089.570	6254154.447
3	294087.395	6253966.576
4	294057.170	6253938.266
5	293880.972	6253947.763

**Legend**

- Approximate Boundary of Broad Development Site
- Approximate Site Boundary
- NSW Cadastre (DFSI, 2021)
- Coordinates

Job No: 61174

Client: Frasers Property Australia

Version: L01 Rev A	Date 13/07/2021
Drawn By: RF	Checked By: RH

Scale 1:3,500

Coord. Sys. GDA 1994 MGA Zone 56

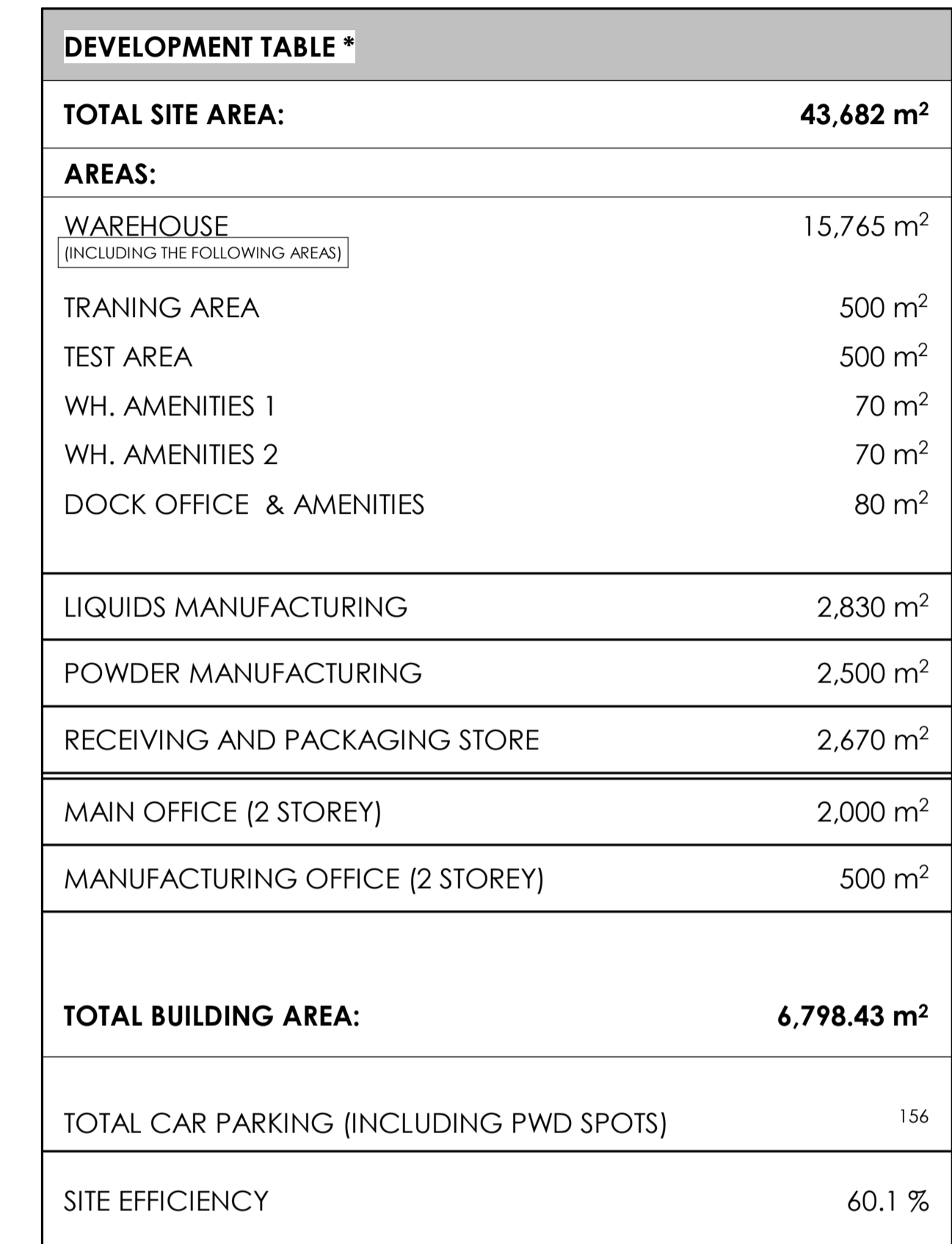
**Ardex Development Site,  
Mamre Road,  
Kemps Creek NSW**

**SITE LAYOUT - JUNE 2021**

**FIGURE 3**

**Attachment 3 – Proposed Development Layout**






1 SITE PLAN  
1 : 500

1

0 5 10  
GRAPHIC SCALE 1:500

**purpose** D.

**SITE PLAN**

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issue
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ARDEX  
KEMPS CREEK NSW

# PRELIMINARY

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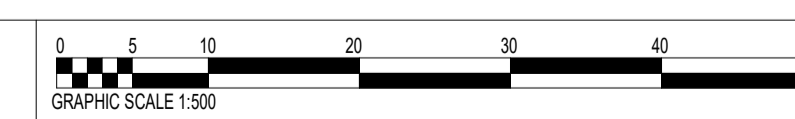
ARCHITECT

**PACE**  
ARCHITECTS

BUILDER / PROJECT MANAGER



	CLIENT
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purpose	DA
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**Attachment 4 – Photographic Log**

**1 – NORTHEAST SITE CORNER, FACING WEST (2019)**



**2 – EXAMPLE SOILS WITHIN FORMER CROP AREAS (JBS&G (2019))**



**3 – CENTRAL SOUTHERN SITE BOUNDARY, FACING NORTHWEST (2019)**



**4 – CENTRAL SOUTHERN SITE BOUNDARY, FACING NORTH (2019)**



Job No: 61174

Client: Fraser

Version: L01 Rev A

Date: 13-7-21

Drawn By: RH

Checked By: SM

Not to Scale

Coord. Sys n/a

**Mamre Road, Kemps Creek**

**ATTACHMENT 4**