

Tiberius (Holroyd) Pty Ltd
30 Kings Park
West Perth, WA 6005

Project 84770.05
30 October 2025
R.008
JJH

Attention: Lucas Flecha
Email: lucas.flecha@acequity.com.au

Response to RtS Comments Proposed Crescent Parklands 1 Crescent Street, Holroyd NSW

1. Introduction

This letter prepared by Douglas Partners Pty Ltd (Douglas) provides comments and responses for contamination and geotechnical matters in the State Significant Development (SSD) Response to Submission (RtS) for the Proposed Crescent Parklands development (1 Crescent Street, Holroyd, 'the site').

A summary of the RtS comments relevant to contamination and geotechnical matters are provided on the following table, alongside responses to the comments and summary of supporting documents.

RtS Reference	RtS Comment	Douglas Response	Relevant Reports / Information
CC-14-1	Contamination and landfill gas The proposal identifies a long-term environmental management plan (LTEMP) that will be required for the recommended remediation strategy (asbestos encapsulation and for the management of LFG risks). Advice is recommended to be sought regarding the entities which are to be responsible for the implementation and enforcement of the LTEMP (NSW EPA, 2022c) prior to completion of the LTEMP, and the LTEMP will be reasonably, legally enforceable through a suitable mechanism. It is understood that the preferred enforcement mechanism will comprise a restriction / public positive covenant on the land title in accordance with the Conveyancing Act 1919 (s.88B), and noted that this mechanism will require further consultation given the potential subdivision of the land, and potential dedication of land to third parties (e.g. public park to Council). Further public notification is anticipated through inclusion in respective strata management plan(s). Management of an LTEMP is anticipated to be enacted through the respective strata bodies and Council (should land be dedicated). It is also noted at this stage the above mechanisms are not yet finalised and will require further consultation with respective stakeholders as part of a LTEMP.	Generally agreed. A draft LTEMP has been prepared which will need to be updated based on future staging requirements to deliver the project, and at that time will also list the responsible entity(s) for the implementation of the LTEMP. The LTEMP will also require revision to reflect the actual remedial works undertaken, once completed. The LTEMP updates will all involve consultation with the relevant consent and responsible parties to ensure that all relevant stakeholders are on board with the dedications and responsibilities listed.	Preliminary LTEMP (PLTEMP) – Douglas report reference 84770.05.R.007.DftA dated November 2024

RtS Reference	RtS Comment	Douglas Response	Relevant Reports / Information
CC-14-2	Contamination and landfill gas The development proposes that during the delivery stages, the LTEMP will address potential contamination risks associated with the park by establishing monitoring requirements and ensuring the long-term safety of the public space. The Site Auditor will oversee the management plan to ensure all risks are appropriately mitigated before the park is handed over to the Council. The LTEMP will contemplate any requirements by Council, and may include items such as a Site Audit Report and Statement stating that the dedication land is suitable for intended use and any agreed operational fund designated for park maintenance, environmental monitoring, and other remediation improvements. The cap and contain strategy, and the landfill gas (LFG) mitigation system will need to be further considered by detailed development plans and detailed remediation specifications that have not yet been completed by the proponent. Even though the risk posed by the development has been summarised by the proposal as compliant with the relevant guidelines and legislations, uncertainty on the impact of the risk because of the regenerating nature of the LFG remains.	Generally, agreed. LFG risk to open space parkland is considered low in the absence of enclosed structures. The updated RAP provides further detail regarding construction staging, including requirement for sequencing of remediation tasks and development of Stage specific remediation work plans (RWP), all to be endorsed for implementation by the Site Auditor.	Updated RAP Douglas report reference 84770.05.R.002.Rev2 dated September 2025

RtS Reference	RtS Comment	Douglas Response	Relevant Reports / Information
CC-14-3	Contamination and landfill gas As part of the passive management systems of the LFG, periodic inspections will be required by designated personnel. There will be an ongoing monitoring requirement for this site, including the proposed parkland, due to the cap and contain strategy for the life of the development. The LFG poses a risk where the methane (CH₄) might form an explosive atmosphere where it is kept in enclosed area. As such that, the buildings on the site are proposed to be constructed with protection membranes. The location of proposed service venting of the LFG is unknown at this point and there is no guarantee that the proposed parkland will not be affected by this risk. Based on the above information, Council's officers are of in the opinion that the risk associated with the dedication of the parkland is high and that Council should undertake the further review of the potential risk.	Agreed on requirement for ongoing monitoring of the cap to be specified in revisions to the PLTEMP, ie, based on respective enforcement entity(s) Sub-slab venting would be at the edge of the building slabs (ie, with each structure including a high-permeability drainage layer beneath the slab / membrane to prevent localised accumulation of gases) and would not extend into the parkland. Capping of the parkland for asbestos contamination would allow for passive diffusion / venting of any residual gases, noting the absence of enclose structures this would not pose a risk for site usage. As noted in response to comment CC-14-2, further detail is to be provided for each stage in supplementary remediation works plans endorsed by the Site Auditor.	RAP and PLTEMP

RtS Reference	RtS Comment	Douglas Response	Relevant Reports / Information
CC-15-7	Proposed public spaces On site soft landscaping capping approach (as proposed in the RAP) within public open space has ongoing future implications for Council on the maintenance and upgrade of installed assets when they are due for renewal and is not supported.	Off-site disposal of all contaminated fill in the park areas (as known or likely to contain asbestos in soils) is not considered an economical or environmentally sustainable option. Delineation of asbestos impacts was considered not practicable by Douglas and the Site Auditor. The alternate capping option provided in the RAP is for hardstand capping which is not likely a suitable option for the proposed public spaces. The minimum soft capping in the RAP could be increased such that surface landscaping is not a critical part of the cap, which may facilitate more routine upkeep / maintenance requirements. A thicker cap would also more readily accommodate any installed assets above the retained asbestos contaminated soils. Alternate options to dedication of the park are outside the scope of the Douglas investigations / reports.	RAP

RtS Reference	RtS Comment	Douglas Response	Relevant Reports / Information
CC-27	Salinity The site is marked as potential moderate salinity on the Salinity Map. A salinity investigation has not been provided to enable assessment against clause 6.9 of the LEP.	Douglas provided additional information in the SEARs response letter, in which no salinity management was considered necessary based on the proposed works.	Douglas reference 84770.03.R.002.Rev0 dated October 2024/ (attached)
CC-32	Environmental health The finalised version of the Long- term Environmental Management Plan must be provided to Council once completed so that it can be added to Council's mapping system and applied to all planning certificates in future.	Agreed	-
DPHI-B-19	Provide further clarification of the proposed cap and contain approach to on-site contamination. In particular:	Refer responses to -A and -B below	-
DPHI-B-19-A	a) clarify whether the Remedial Action Plan (RAP) preferred mitigation measure is to cap the entire site, part of the site or provide containment cells, noting the RAP identifies Areas of Concern (AoC), however do not cover the entire site	The whole site is to be capped. The RAP currently establishes that all fill across the site requires management for asbestos in soil.	

RtS Reference	RtS Comment	Douglas Response	Relevant Reports / Information
		Gas management is proposed per proposed structure based on a risk assessment approach.	
DPHI-B-19-B	b) the Department notes Council does not support the approach for site capping with soft landscape above. Please review in consultation with Council and provide amendments / mitigation measures (as necessary).	A 500 mm minimum soft landscaping cap is considered a typical industry adopted standard for long-term management of asbestos in soils, and has been endorsed by the Site Auditor review of the RAP. Localised deeper capping would be required depending on planting requirements (as noted in the RAP). Douglas notes based on previous discussions with Council the contention with the capping was more directly related to future dedication of land with a LTEMP (ie, per RtS comment CC-15-7) Refer additional comments for CC-15-7	RAP

2. Limitations

Douglas Partners Pty Ltd (Douglas) has prepared this report (or services) for this project at 1 Crescent Street Holroyd in line with Douglas' proposal 84770.05.P.006.Rev1 dated September 2025 and acceptance received from Lucas Flecha of Tiberius (Holroyd) Pty Ltd. The work was carried out under A Professional Services Agreement with Tiberius (Holroyd) Holdings Pty Ltd). This report is provided for the exclusive use of Tiberius (Holroyd) Pty Ltd 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 Douglas, does so entirely at its own risk and without recourse to Douglas for any loss or damage. In preparing this report Douglas has necessarily relied upon information provided by the client and/or their agents.

The results provided in the report are indicative of the sub-surface conditions on the site only at the specific sampling and/or testing locations, and then only to the depths investigated and at the time the work was carried out. Sub-surface conditions can change abruptly due to variable geological processes and also as a result of human influences. Such changes may occur after Douglas' field testing has been completed.

Douglas' advice is based upon the conditions encountered during previous investigations. The accuracy of the advice provided by Douglas in this report may be affected by undetected variations in ground conditions across the site between and beyond the sampling and/or testing locations. The advice may also be limited by budget constraints imposed by others or by site accessibility.

The assessment of atypical safety hazards arising from this advice is restricted to the environmental / components set out in this report and based on known project conditions and stated design advice and assumptions. While some recommendations for safe controls may be provided, detailed 'safety in design' assessment is outside the current scope of this report and requires additional project data and assessment.

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. Douglas 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.

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

Yours faithfully

Douglas Partners Pty Ltd

A handwritten signature in blue ink, appearing to read 'Joel James-Hall'.

Joel James-Hall
Associate

Reviewed by

A handwritten signature in blue ink, appearing to read 'P. Gorman'.

Paul Gorman
Principal

Attachments: About this Report
SEARs response letter