

7 April 2016

Barry Steedman
Mirvac Projects Pty Ltd
Via email: barry.steedman@mirvac.com

Response to Submissions – ATP Development

Dear Barry,

1. Introduction

JBS&G Australia Pty Ltd (JBS&G) have been engaged by Mirvac Projects Pty Ltd (Mircvac) for the provision of environmental consultancy services associated with the remediation and redevelopment of a portion of the Australian Technology Park (ATP), herein referred to as the site. As part of this engagement, Mirvac have requested JBS&G to provide supporting evidence to close out the following enquires/comments:

Comments from the Department and Council – Consideration to be given to the form and mass of Building 1 including relocation of parking to basements.

As discussed in the draft remedial action plan (RAP), available site characterisation data has identified fill material containing, in some instances, concentrations of carcinogenic PAH compounds (including benzo(a)pyrene TEQ), TRH / TPH, heavy metal (principally copper, nickel and lead) and asbestos (friable) in exceedance of ecological-based assessment criteria, and at relatively few locations, the adopted health-based criteria as relevant to the proposed future permissible land uses.

Based on the reported contaminant threshold concentrations, fill materials require remediation / management with respect to proposed permissible land uses which has been incorporated into the current development approach.

Should the proposed parking arrangements be modified to accommodate basement parking rather than at grade, fill materials would require off-site disposal to a landfill lawfully able to accept them. In doing so, consideration should be given to the following:

- Disposal of fill materials to landfill may have significant implication to the Green Star and Ecologically Sustainable Development objectives, and will not meet waste minimisation objectives of the *Waste/Avoidance and Resource Recovery Act 2001*;
- The NSW waste hierarchy prefers on-site retention of fill by means of cap / cover as opposed to off-site disposal to landfill. As such, excavation of fill materials and disposal to landfill is not acquiescent with current EPA guidance;
- Changes to the design would need to consider the increase in truck movements. Based on review of the current design plans, all fill materials are proposed to be retained on site, thus reducing truck movements and disruption to ATP tenants and the surrounding community;
- Consideration needs to be given ATP neighbours including the childcare centre. The additional bulk excavation activities to facilitate basement parking has the potential to result in increased dust emissions,

- Shallow groundwater conditions are present within this portion of the ATP site. As such, consideration needs to be given to the design of the basement and the potential for long term ongoing groundwater management (i.e. treatment of any basement groundwater ingress before being discharged to sewer under a trade waste agreement with Sydney Water or similar); and
- To facilitate bulk excavation activities, a dewatering license may be required to be obtained from the NSW Department of Primary Industry (previously the NSW Office of Water).

Contamination and Remediation – Clarify groundwater contamination and remediation method. Mirvac to engage with JBS&G plus the auditor to ensure the release of the Site Auditor Statement.

Previous interim Site Audit Reports noted that groundwater has been assessed as part of the greater ATP site and that no groundwater remediation is considered to be required. Reference should be made to Site Auditor advice Ramboll (2015¹).

As discussed in the RAP prepared for the site, groundwater conditions are considered typical of inner Sydney urban environments with slightly elevated heavy's metals, and to a lesser extent PAHs, and do not require specific remediation with respect to protection of the environment. In addition, site fill materials have been reported as having non to low leachable properties and do not represent an unacceptable migration risk to groundwater. As such, groundwater remediation is not considered warranted.

JBS&G consider that groundwater has been adequately assessed and will be managed via the Site Audit process.

Other

JBS&G recommend that Mirvac seek staged sign-offs to ensure development conditions do not require a Site Audit Statement for the entire site before a construction certificate (or similar) is issued.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email ncussen@jbsg.com.au.

Yours sincerely:



Nathan Cussen
Senior Consultant
JBS&G Australia Pty Ltd

Reviewed/Approved by:



Andrei Woinarski
Principal
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¹ Draft *Site Audit Report Public Open Space Areas, Australian Technology Park, Eveleigh*. Ramboll Environ Australia Pty Ltd dated September 2015 (Ramboll 2015)