

CONTAMINATION REPORT

**Storage & Distribution Warehouse
221-235 Luddenham Road, Orchard Hills NSW**

Prepared for **HB&B Property Pty Ltd**


23 May 2025

Ref: DRM P23.1039.V21-R01





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Report Title	Contamination Report
Site	Storage & Distribution Warehouse 221-235 Luddenham Road, Orchard Hills NSW
File Reference	DRM P23.1039.V21-R01
Date	23 May 2025

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DOCUMENT HISTORY & DISTRIBUTION

Version	Date	Author	Reviewer	Distributed to
Final	23 May 2025	Rahabar Alam	Nalin De Silva	Mike Lloyd of HB&B Property Pty Ltd

Development Risk Management Pty Ltd

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Geotechnical and environmental reporting relies on the interpretation of factual information based on judgment and opinion and is far less exact than other engineering or design disciplines due to a range of uncertainties and variabilities. Geotechnical and environmental reports are for a specific purpose, development and site as described in the report and may not contain sufficient information for other purposes, developments or sites (including adjacent sites) other than that described in the report.

Subsurface conditions can change with time and can vary between test locations. Therefore, actual conditions in areas not sampled may differ from those predicted since no subsurface investigation, no matter how comprehensive, can reveal all subsurface details and anomalies. Anthropogenic impact and natural causes can also affect subsurface conditions and thus the continuing adequacy of these reports. Seasonal variations can also affect subsurface conditions. DRM should be kept informed of any such events and should be retained to identify variances, conduct additional tests if required, and recommend solutions to problems encountered on site.

Data obtained from nominated discrete locations, subsequent laboratory testing and empirical or external sources are interpreted by trained professionals in order to provide an opinion about overall site conditions, their likely impact with respect to the report purpose and recommended actions in accordance with any relevant industry standards, guidelines or procedures.



1. INTRODUCTION

Development Risk Management Pty Ltd (DRM) was engaged by HB&B Property Pty Ltd, to prepare a Contamination Report for a new storage and distribution warehouse at 221-235 Luddenham Road, Orchard Hills NSW. For the purpose of this report, “The Property” and “The Site” are defined as shown on [Figure 1](#) and [Figure 2](#).

This Contamination Report has been prepared by DRM to accompany a State Significant Development Application (SSD 81434988) for a Storage and Distribution Warehouse. The project seeks detailed approval for a new storage and distribution warehouse within the Alspec Industrial Business Park (AIBP) at 221-235 Luddenham Road, Orchard Hills NSW. The site is legally described as Lot 1 in DP 1293805.

This report has been prepared to address the Secretary’s Environmental Assessment Requirements (SEARs) issued for the project (SSD-81434988).

Specifically, the project comprises the following:

- ▲ Construction of a new warehouse with a two-level ancillary office. The warehouse is predominantly 14.7 metres in height, with a high-bay warehouse component at the western portion of the building which achieves a maximum height of 39 metres;
- ▲ A total building area of 45,512sqm; broken down as follows:
 - ▲ Warehouse area: 43,607sqm;
 - ▲ Office Area: 1,905sqm;
- ▲ Loading areas at the north and south sides of the warehouse, with hardstand surrounding the perimeter of the warehouse. Hardstand and carpark areas are accessed via four new driveways from the AIBP internal estate road;
- ▲ Provision of vehicular parking onsite to accommodate cars, vans, semi-trailers and B-doubles. It is envisaged that approximately 329 spaces will be provided on site within the proposed hardstand and carparking areas;
- ▲ Perimeter landscaping and tree planting with a total area of 10,236sqm (10%).

This report has been prepared in response to the requirements contained within the Secretary’s Environmental Assessment Requirements (SEARs) dated 4 April 2025 and issued for the SSDA (SSD 81434988). Specifically, this report has been prepared to respond to the SEARs requirement and government agency comments issued below.

Item	Description of Requirement	Section Reference (this Report)
Contaminati on	In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	Section 4

The site is located at 221-235 Luddenham Road, Orchard Hills within the Penrith Local Government Area (LGA). The site is legally described as Lot 1 in DP 1293805.



Figure 1-1 Aerial Photograph (the site: Source Urbis)



It is important to note the broader site is known as the Alspeck Industrial Business Park (AIBP) and is subject to another SSD and multiple DAs seeking approval for medium to large format industrial warehouses.

1.1. Background

At the commencement of this work, DRM understood:

- ▲ DRM and others had conducted extensive intrusive assessments, and undertaken remediation works to render the Property suitable for the proposed commercial and industrial land use;
- ▲ Subsequently, the following two validation reports were prepared to demonstrate that the Property had been rendered suitable for the proposed land use:
 - ▲ DRM, 2025a. “Final Validation Report, 221-227 & 289-311 Luddenham Road Orchard Hills NSW” (ref: DRM P23.1039-R05r2 dated 2 April 2025);
 - ▲ DRM, 2025b. “Site Validation Report, Central & NW Portions Of Outer Sydney Orbital Corridor 221-227 & 289-311 Luddenham Road, Orchard Hills, NSW.” (ref: DRM P23.1039.V14-R12 dated 22 May 2025); and
- ▲ This contamination report is to demonstrate the suitability of the Site to accompany the development application (SSD-81434988).



1.2. Objectives

The objective of this report are to:

- ▲ Demonstrate the suitability of the Site, from a contamination perspective, for the proposed commercial/industrial land use, in accordance with the National Environmental Protection Measure (NEPC, 2013) and SEPP (Resilience & Hazards, 2021); and
- ▲ Provide advice on further investigations, management strategies or remedial measures that may be required to render the site suitable for the proposed land use.

1.3. Scope of Work

The scope of work undertaken to address the project objectives included:

- ▲ A desktop review of:
- ▲ Final Validation Report (DRM, 2025a);
- ▲ Site Validation Report for the Central and Northwest portions of Outer Sydney Orbital corridor (DRM, 2025b);
- ▲ Master Plan by nettletontribe (14291_DA001); and
- ▲ Data assessment and reporting.



2. Site Identification

The Property and Site identification details are presented below:

Table 2-1 Site identification details

Identifier	Description
Property and site locality	The property is located to the west of Luddenham Road. Location is presented in Figure 1
Site Layout	The site covers an area of approximately 10.5Ha.
Lot Number and Deposited Plan (property and site)	The Property - Lot 1 in DP1293805 and Lot 2 in DP1293805 The Site - Part of Lot 1 in DP1293805.
Local Government Authority	Penrith City Council
Zoning (NSW Government’s online Planning Portal)	E4: General Industrial
Detail and Level Survey	Attached in Appendix A



3. Desktop Review

3.1. Contamination Assessments by Construction Sciences

Construction Sciences conducted several contamination assessments across the property, including a stage 1 preliminary site investigation (PSI) and a stage 2 detailed site investigation (DSI). These assessments and several other targeted assessments identified asbestos and other chemical contamination “hotspots” scattered across the Property. Construction Sciences conducted remediation works in several stages between 2021 and 2024 and prepared an interim validation report for the completed remediation works. However, a final validation report for the Property was not issued given that several remaining structures needed to be demolished to complete remediation works.

DRM was engaged by the client in 2024 to conduct validation of the remediation of the remaining areas and to complete the final validation report for the property. All assessment and remediation works conducted by Construction Sciences were discussed and a final validation report was prepared by DRM, as described below.

3.2. Final Validation Report (DRM, 2025a)

DRM prepared a “final validation report” to demonstrate that the identified contamination within the area occupied by the proposed industrial development within the Property ([Figure 1](#)) had been satisfactorily remediated and rendered suitable for the proposed commercial and industrial land use, in accordance with the requirements of the National Environmental Protection Measure (NEPC, 2013).

The scope included reviewing previous reports by Construction Sciences, observing and documenting remediation works at AEC09b and test pit TP107 with validation sampling and lab analysis, a targeted contamination assessment within proposed flood basin areas, assessment of dam water and sediment quality and preparing the final validation report.

The report concluded that the Property can be made suitable for the proposed industrial land use, subject to

- ▲ Further assessment and remediation of asbestos impacted soils in the central portion of the Outer Sydney Orbital corridor; and
- ▲ Assessment and remediation (if required) within the areas currently leased by Sydney Metro and Endeavour Energy, at the completion of the lease periods.

This report can be accessed via DRM SharePoint by clicking the link below.

[DRM \(2025a\) – Final Validation Report](#)

3.3. Site Validation Report for OSO (DRM, 2025b)

Investigations conducted by Construction Sciences identified unacceptable asbestos impact in soils stockpiled and spread within the central portion of the Outer Sydney Orbital (OSO) corridor. DRM satisfactorily remediated this contamination in late 2024 and prepared a site validation report for the Central Portion of the OSO to demonstrate that the remediation areas have been rendered suitable for the proposed commercial and industrial land use, in accordance with the requirements of the National Environmental Protection Measure (NEPC, 2013).

The scope included reviewing previous reports, observing and documenting the remediation process, conducting validation sampling and laboratory analysis, reviewing waste disposal documentation from the remediation contractor, and data assessment and reporting.



Based on the remediation and validation works, DRM (2025b) concluded that the Central Portion of the OSO had been satisfactorily remediated and has been rendered suitable for the proposed industrial land use from a contamination perspective, in accordance with SEPP (R&H, 2021) and NEPM (NEPC, 2021).

The validation report (DRM, 2025b) also reported on other remediation works conducted in the Northwestern portion of the OSO, but this work is not referenced here as it is not relevant to the Site, as defined above and in [Figure 2](#).

3.4. Relevance Of the Validation Reports to the Site

Comparison of the areas of environmental concern (AECs) referenced in DRM (2025a) and DRM (2025b) validation reports against the area proposed to be developed (i.e. the Site as defined above) indicates that several AECs were located within the Site (refer to [Figure 3](#)). These AECs are summarised below.

Table 3.4-1 AECs located within the Site

AEC	Description	Remedial Outcome
AEC02a	Approximately 280m of internal gravel roads that were impacted by asbestos (fines and fibres).	This AEC was remediated and validated successfully by Construction Sciences and is discussed in DRM (2025a) final validation report. Further assessment or management is not warranted.
AEC06	Approximately 30m ³ of household and demolition waste	This AEC was remediated and validated successfully by Construction Sciences and is discussed in DRM (2025a) final validation report. Further assessment or management is not warranted.
OSO AEC03a	Bonded asbestos across an approximate area of 300m ² , to a nominal depth of approximately 0.1m	This AEC was assessed and remediated by DRM in late 2024 (DRM, 2025b). Further assessment or management is not warranted.
OSO AEC04	Stockpile of soil and waste containing bonded and friable asbestos located immediately outside the western boundary of the Site. We have considered this AEC due to the proximity to the Site, despite it being located outside of the Site.	This AEC was assessed and remediated by DRM in late 2024 (DRM, 2025b). Further assessment or management is not warranted.
Dam 2	The site encroaches into the south eastern portion of Dam 2. Water and sediments within the of the dam was considered an AEC.	Assessment of dam water and sediment by DRM indicated that the dam water and sediment did not contain unacceptable contamination and thus were suitable for beneficial re-use on site. Further assessment or management is not warranted.

As apparent from the table above, DRM notes that all identified contamination aspects within the Site (as defined above) have been satisfactorily remediated.



4. Conclusions and Recommendations

Based on the desktop review of validation reports ((DRM, 2025a) and (DRM, 2025b)), DRM considers that:

- ▲ The identified contamination in the site has been satisfactorily remediated and validated;
- ▲ The potential for contamination to be present in the Storage and Distribution Warehouse area (the site) is, low; and
- ▲ The site is suitable for proposed commercial/ industrial land use.

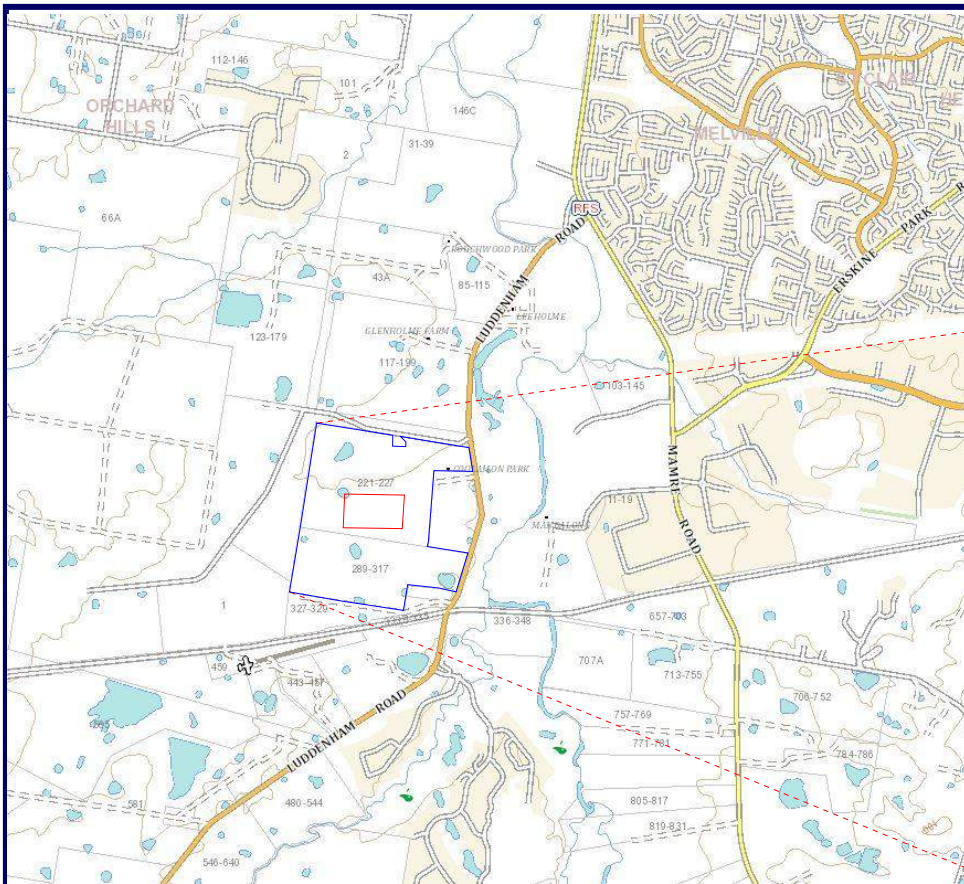
It is important to note however, that the above conclusion does not preclude the potential for isolated hotspots of unexpected contamination to be encountered during earthworks. If such isolated pockets of unexpected contamination is encountered during construction works, DRM recommends it be managed in accordance with the Unexpected Finds Protocol (UFP) (CS, 2021a)¹.

This report must be read in conjunction with the [Limitations and General Notes](#) page at the front of this report.

¹ CS, 2021a. "Bulk Earthworks Phase Unexpected Finds of Contamination in Soil Management Protocol 'Portion of Lot 1, DP1099147 and Lot 242, DP1088991' 221-227 and 289-317 Luddenham Road, Orchard Hills, NSW" (Ref: 10791EV.P.68-R09, dated 15 March 2021)

FIGURES





Legend

-  Approximate Property Extent
-  Approximate Site Extent



Scale:  500 m

Date: 23 May 2025

Drawn By: RA

Drawing Number: P23.1039.V21-R01.F1

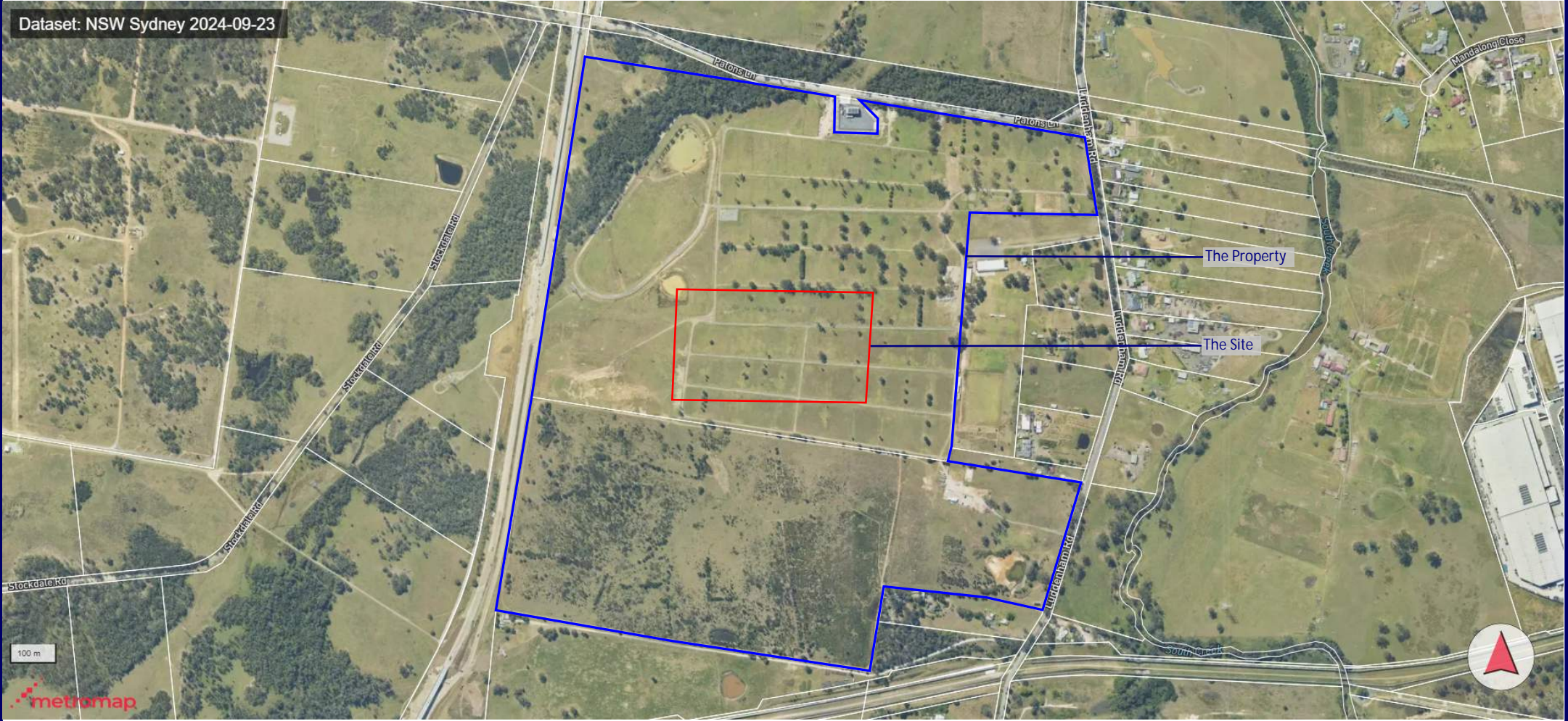
Client: HB&B Property Pty Ltd

Project: Contamination Report

Location: 221-235 Luddenham Road, Orchard Hills, NSW

Title: Figure 1 - Site Locality Plan

Dataset: NSW Sydney 2024-09-23



Legend

-  Approximate Property Extent
-  Approximate Site Extent



Development Risk Management Pty Ltd

Scale:  200 m

Date: 23 May 2025

Drawn By: RA

Drawing Number: P23.1039.V21-R01.F2

Client: HB&B Property Pty Ltd

Project: Contamination Report

Location: 221-235 Luddenham Road, Orchard Hills, NSW

Title: Figure 2 - Site Layout

Dataset: NSW Sydney 2024-09-23



Legend



-  Approximate Property Extent
-  Approximate Site Extent
-  AEC02a (DRM, 2025a)
-  AEC06 (DRM, 2025a)
-  OSO AEC03a (DRM, 2025b)
-  OSO AEC04 (DRM, 2025b)



Development Risk Management Pty Ltd

Scale:  200 m 

Date: 05 May 2025

Drawn By: DP

Drawing Number: P23.1039.V21-R01.F3

Client: HB&B Property Pty Ltd

Project: Contamination Report

Location: 221-235 Luddenham Road, Orchard Hills, NSW

Title: Figure 3 - Relevant Areas of Environmental Concerns

Appendix A

Survey and Proposed Development Plans





Client



Project Name
**Alspeck Industrial Business Park
 Storage and Distribution Warehouse**

Project Address
 Luddenham Road, Orchard Hills NSW

Drawing Title:
MASTER PLAN

Date:
 11/04/25

Drawing Number:
 14291_DA001

Sheet Size:
 A1

Issue:
 P3

Scale:
 1:3000

nettleontribe



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