
**Preliminary Long Term Environmental
Management Plan**

Proposed Redevelopment

105-153 Miller Street, North Sydney NSW

Prepared for Investa Custodian (2) Pty Ltd

Project 86964.05

18 June 2025

Document History

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The undersigned, on behalf of Douglas Partners Pty Ltd, confirm that this document and all attached drawings, logs and test results have been checked and reviewed for errors, omissions and inaccuracies.

Signature

Date

Author		18 June 2025
Reviewer	p.p. 	18 June 2025

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Executive Summary

Investa Custodian (2) Pty Ltd (Investa) has requested Douglas Partners Pty Ltd (Douglas) to prepare a Preliminary Long Term Environmental Management Plan (pLTEMP) for a site located at 105-153 Miller Street, North Sydney, NSW (hereinafter referred to as 'the site', further details provided in Section 3.1) to address the requirements of the state significant development application (SSDA).

The pLTEMP has been prepared as a contingency measure. No contamination requiring remediation or management has currently been identified at the site, however further investigation has been recommended to assess the suitability of the site for the proposed development.

Should contamination requiring ongoing management be identified during the recommended further investigation and/or during the construction phase of the proposed development, an LTEMP will need to be prepared and implemented. If no contamination requiring ongoing management is identified, an LTEMP will not be required.

The key objective of this pLTEMP is to demonstrate that if contamination requiring long term management is identified, it could be appropriately managed under the following elements:

- Roles and responsibilities – Section 5.1;
- Management activities – Section 5.4;
- Monitoring and review of the EMP – Section 6;
- Communication – Section 7; and
- Legal mechanisms and public notification – Section 8.

Preliminary Long Term Environmental Management Plan

Proposed Redevelopment

105-153 Miller Street, North Sydney NSW

THIS PRELIMINARY LONG TERM ENVIRONMENTAL MANAGEMENT PLAN (LTEMP) IS INTENDED TO PROVIDE THE GENERAL FORM OF WHAT THE FINAL LTEMP (IF REQUIRED) WILL COMPRISE. A FINAL LTEMP WOULD NECESSARILY REQUIRE SITE SPECIFIC INFORMATION RELATING TO THE ACTUAL REMEDIATION UNDERTAKEN THAT CAN ONLY BE FULLY DETERMINED DURING SUBSEQUENT INVESTIGATION(S) / REMEDIATION.

THE CONSENT AUTHORITY AND THE SITE OWNER WILL NEED TO REVIEW AND APPROVE ANY FUTURE LTEMP BEFORE IT IS FINALISED.

1. Introduction and purpose

Investa Custodian (2) Pty Ltd (Investa) has requested Douglas Partners Pty Ltd (Douglas) to prepare a Preliminary Long Term Environmental Management Plan (pLTEMP) for a site located at 105-153 Miller Street, North Sydney, NSW (hereinafter referred to as 'the site', further details provided in Section 3.1) to address the requirements of the state significant development application (SSDA).

The site boundary and location of site features relevant to this pLTEMP are shown on Drawings 1-3, attached in Appendix A. At the time of preparing this pLTEMP, the site was occupied by a medium to high rise commercial building with predominately retail / plant rooms and carpark spaces on lower ground / basement levels, and offices on upper levels.

The pLTEMP has been prepared as a contingency measure. No contamination requiring remediation or management has currently been identified at the site, however further investigation has been recommended to assess the suitability of the site for the proposed development.

A remediation action plan (RAP) has been prepared, which includes the requirements for the proposed further investigation to be undertaken when suitable site access is available, and contingency requirements for remediation, should contamination of concern be identified.

Should contamination requiring ongoing management be identified during the recommended further investigation and/or during the construction phase of the proposed development, an LTEMP will need to be prepared and implemented. If no contamination requiring ongoing management is identified, an LTEMP will not be required.

The key objective of this pLTEMP is to demonstrate that if contamination requiring long term management is identified, it could be appropriately managed.

2. Proposed development

The proposed development includes the redevelopment and adaptive reuse of the existing heritage building as a new, mixed-use of commercial (retail) / tertiary education institution.

Specifically, it will include:

- Adaptive reuse and restoration of the existing Miller Street wing;
- Demolition of the Denison Street wing and construction of a new high-rise building;
- Adaptive reuse to the ground level to deliver a significantly enhanced public domain;
- Construction of a double height ground floor retail / tertiary education and the delivery of a public open space along Miller Street; and
- Basement carparking and loading dock accessed from a relocated entry off Denison Street.

No excavation or dewatering is proposed as part of the development.

3. Background

3.1 Site information

Site address	105-153 Miller Street, North Sydney NSW
Legal description	Lot 2, D.P. 792740
Area	6640 m ²
Zoning	Zone E2 Commercial Centre
Local Council Area	North Sydney Council

The site boundary is shown on Drawing 1, attached in Appendix A.

3.2 Previous reports

The following previous reports prepared for the site were reviewed to inform this pLTEMP:

- Douglas (2019), *Preliminary Contamination Investigation, Proposed 'Campus 105' Development, 105 Miller Street, North Sydney*, Reference no. 86964.00 (PSI);
- Douglas (2025), *Detailed Site Investigation, Proposed Redevelopment, 105-153 Miller Street, North Sydney*, Reference no. 86964.04 (DSI); and
- Douglas (2025), *Remediation Action Plan, Proposed Redevelopment, 105-153 Miller Street, North Sydney*, Reference no. 86964.05 (RAP).

For the management and controls of hazardous building materials (aboveground), please refer to JBS&G (2024) report on *Hazardous Building Materials Survey, 105 Miller Street, North Sydney*, Reference 67072, 162, 151 (Rev A).

3.3 Summary of site history

The PSI included a review of site history information and identified that the site was used for residential purposes prior to the construction of the existing commercial building in 1957. The surrounding areas have been predominately used for commercial purposes since at least the 1980s.

Potentially contaminating business activities identified to have occurred at the site, and immediately up-gradient of the site include:

On-site sources:

- Dry-cleaning activities;
- Motor garage;
- Solvent storage for general cleaning purposes; and
- Use of a diesel generator for emergency power.

Off-site sources:

- Dry-cleaning activities;
- Boat builders; and
- Plastic and chemical manufactures and diesel engine manufacturers.

4. Summary of potential site contamination and proposed investigation

4.1 Potential soil contamination

The DSI recorded that elevated levels of TRH and PAH were recorded in soils, albeit at concentrations below the adopted site assessment criteria (SAC). The DSI noted that a bituminous membrane observed onsite could be the source these compounds.

There was no obvious sign of anthropogenic inclusion (e.g. demolition waste) other than road base gravel observed in soil during the DSI.

The NSW EPA's (2022)¹ minimum recommended sampling density of sixteen (16) test locations was not met due to site access constraints. The DSI included testing from twelve (12) test locations. As a result, additional test locations would be required during the data gap investigation(s) to meet the recommended sampling density.

4.2 Potential soil vapour contamination

The analytical results of the DSI report recorded concentrations of volatile chlorinated hydrocarbons (VCH) sub-slab vapour in the sampled locations were below the adopted SAC.

¹ NSW EPA (2022), *NSW EPA's Contaminated Land Guidelines: Sampling design part 1 – application*

However, given the presence of former dry cleaner(s) and a mechanical workshop on site and detections of TRH in soil/groundwater and VOC in groundwater during the DSI, further investigation was required to characterise the potential for unacceptable soil vapour impacts at the site.

4.3 Potential groundwater contamination

The DSI recorded detectable concentrations of TRH (F1 and F2) and VOC (trihalomethanes) above the laboratory detection limit but below the adopted SAC. Trihalomethanes can occur from water chlorination and may be indicative of the groundwater in the well being impacted by leakage from the potable water supply. Chloroform also has a range of industrial uses and can be used in dry cleaning.

The recorded TRH was in the light to medium fraction (F1 and F2) and could consist of the detected VOC or be indicative of contamination from a different potential source, such as the former on- and off-site sources such as the motor garages or dry cleaners.

Further investigation is required to assess the significance of the recorded TRH and VOC.

5. Management requirements

5.1 Roles and responsibilities

The site owner is Investa Custodian (2) Pty Ltd (Investa). Investa would be the legal entity responsible for implementing any future LTEMP.

It is noted that in the event that future ownership of the site passes to a party other than the site owner, any future LTEMP must be included as a condition of sale / hand over and remain legally enforceable.

The key stakeholders' responsibilities in implementing any future LTEMP are summarised in Table 1.

Table 1: Key Stakeholders' Responsibilities

Stakeholders	Key Responsibilities
Site Owner / Management	<ul style="list-style-type: none"> • Overall responsibility for the implementation of the LTEMP; • Planning proposed works subject to compliance with the LTEMP and providing direction and induction to contractors / workers; • Ensuring inspections are conducted as required; • Resolution of any recorded non-conformances or maintenance requirements; • Ensuring the existence of the LTEMP is known to all stakeholders, prospective purchasers and tenants; • Ensuring compliance with the LTEMP; and • Nominating a person responsible for overseeing the implementation of the LTEMP.

Stakeholders	Key Responsibilities
Contractors	<ul style="list-style-type: none"> • Notification of works; • Conducting works in accordance with the LTEMP, any additional recommendations from the Environmental Consultant and relevant regulations; and • Where necessary, contractors will also be trained in accordance with the requirements of this document.
Environmental Consultant	<ul style="list-style-type: none"> • Preparing the LTEMP; • Providing input to inform requirements for any proposed future site works if required by the LTEMP and requested by the site owner; • Assisting the site owner, when requested, to meet its responsibilities under the LTEMP; and • Conducting works in accordance with the LTEMP and relevant regulations.

5.2 Legal obligations

Any future LTEMP will need to be made legally enforceable, as discussed in Section 8. The site owner will be the legal entity responsible for implementing the LTEMP.

Other general legislative requirements and the need for specific approvals will be considered as part of any future LTEMP, and may include requirements under the following:

- Contaminated Land Management Act 1997 (CLM Act);
- Environmental Planning and Assessment Act 1979 (EP&A Act);
- Protection of the Environment Operations Act 1997 (POEO Act); and
- Work Health and Safety Act 2011 and regulations available from SafeWork NSW.

If ownership of the site changes in the future, then the requirements of the Development Application Consent would need to be expressed to the new owners who would become the legal entity responsible for implementation of any future LTEMP. An LTEMP, if required, is to remain enforceable for the future unless:

- Remediation and/or redevelopment of the site removes the contamination requiring management; or
- Regulatory requirements change and void the need for the LTEMP to be implemented.

5.3 Compliance with the LTEMP

Any future LTEMP will need to clearly set out the following:

- The actions needed to meet the plan’s reporting requirements – please refer to Section 5.4 for reference. The LTEMP will outline the site-specific actions required i.e. inspections and regular monitoring including sampling and testing; and
- Who is responsible for taking those actions – refer to Table 1 for reference. Should additional stakeholders be involved, Table 1 will need to be updated in the LTEMP.

5.4 Management activities

5.4.1 General

Any future LTEMP will provide details of the management requirements. Possible requirements based on available data are briefly outlined below.

5.4.2 Soil contamination

In the event that ongoing management of contaminated soil is required, the preferred management approach will be on-site management below a capping layer formed by the current concrete slab, and any replaced concrete slab.

The following general management actions are to be considered as part of the preparation of any future LTEMP:

- Controls to prevent damage to the capping layer;
- Controls to manage penetration and repair of the capping layer, should it be required; and
- Inspection requirements to assess for unacceptable damage / need for repair of the capping layer.

5.4.3 Soil vapour contamination

In the event that ongoing management of soil vapour is required, the preferred management approach will be a passive mitigation system to prevent egress of the vapours into the building.

The following general management actions are to be considered as part of the preparation of any future LTEMP:

- Controls to prevent damage to the vapour barrier;
- Controls to manage penetration and repair of the vapour barrier, should it be required;
- Ongoing monitoring requirements to validate the performance of the vapour barrier; and
- Inspection requirements to assess for unacceptable damage / need for repair of the vapour barrier.

5.4.4 Groundwater contamination

In the event that ongoing management of groundwater contamination is required, the preferred management approach will be monitored natural attenuation (MNA), if assessed to be suitable for the site.

The following general management actions are to be considered as part of the preparation of any future LTEMP:

- Ongoing monitoring requirements to validate the success of the MNA;
- Triggers for active remediation; and
- Requirements to assess when the remediation objectives have been met, and monitoring can discontinue.

6. Monitoring and review of the EMP

6.1 Monitoring program

Monitoring program will be developed with consideration of the following requirements:

- The objectives of the monitoring program for example:
 - o Detecting and acting on signs that the contamination has changed behaviour; and
 - o Detecting and responding to changes in the performance of remedial measures.
- Monitoring parameters and frequency (in a table) all environmental media to be monitored / sampled;
- Monitoring locations (by marking them on a site map or maps);
- Monitoring method(s) to be followed;
- A decision process for additional actions and for ending monitoring;
- Reporting actions and frequency; and
- Monitoring and reporting should be undertaken by a certified environmental consultant. The LTEMP should also outline the procedures for data recording, data quality assurance, data quality control during monitoring and conclude whether monitoring objectives are being met, or further actions are required.

6.2 Record keeping and reporting

The implementation of any future LTEMP is to be recorded, including records being kept of any reports, monitoring, inspections, maintenance, or defects. The record keeping requirements and methods are to be included in the LTEMP.

A certified environmental consultant is responsible for preparing relevant monitoring reports and submitting the reports to the site owner / management team.

6.3 Contingency plan and corrective actions

The general procedures to be followed in the event of breaching the long-term management system are as follows:

1. Cease work at that location and contact the site owner / management;
2. Place barricades around the affected area (the area of environmental concern – AEC);
3. Notify authorities needed to obtain emergency response for any health or environmental concerns, if required;
4. Notify any of the authorities that the contractor is legally required to notify (e.g. DPEI, SafeWork); and
5. Notify the Environmental Consultant.
6. The Environmental Consultant will inspect the find and if deemed necessary, design and implement an investigation to assess the risk of hazard:
 - If a potential hazard is identified, the Environmental Consultant will outline a procedure to remediate and/or manage the find; and

- The contractor will undertake the mitigation works which will be validated by the Environmental Consultant generally in accordance with the LTEMP, or any other procedural document produced in response to the find.

As a minimum, the any future LTEMP should outline:

- Job title and contact details of relevant personnel i.e. the site owner or management team responsible to comply with the LTEMP;
- Steps to follow, similar to the above, including details on specific investigation(s) and contingency measures relevant to the area(s) / contaminant(s) of concern;
- Steps to notifying relevant authorities and if relevant residents / community for off-site migration of contamination; and
- Reporting on the incident or accident and any corrective actions undertaken / required.

6.4 **Review of LTEMP**

Any future LTEMP should be periodically reviewed to check if it remains relevant, effective, consistent with changes in legislative requirements (including any applicable management order, ongoing maintenance order or licences), and consistent with changes in industry best practice.

The LTEMP is to include the review process and agreed review timeframes. If the LTEMP is required to be revised this is to be done by a certified environmental consultant.

Triggers for earlier review may include:

- Significant changes in site conditions;
- Changes in any assumptions that underlie the defined scope of the LTEMP; and
- Site modifications or construction activities.

Any updated version of the LTEMP must be distributed to all relevant stakeholders, to be identified in the LTEMP, and any site management and contractors / consultants that are responsible for management, maintenance and inspection of the site.

7. **Communication**

Any future LTEMP is to include protocols for communication relevant information to all stakeholders. This is to include changes to the person(s) responsible for overseeing the implementation of the LTEMP, any amendments to the LTEMP, and changes in site conditions relevant to implementation of the LTEMP.

8. Legal mechanisms and public notification

Any future LTEMP is to be enforceable for the foreseeable future to meet the requirements of Section 3.4.6 of the NSW EPA *Contaminated Land Management Guidelines for the NSW Site Auditor Scheme* (3rd edition) (NSW EPA 2017) and Section 1.7 of the NSW EPA *Contaminated Land Guidelines, Consultants Reporting on Contaminated Land* (NSW EPA 2020). It is anticipated that the legal mechanism would be compliance with a condition of consent.

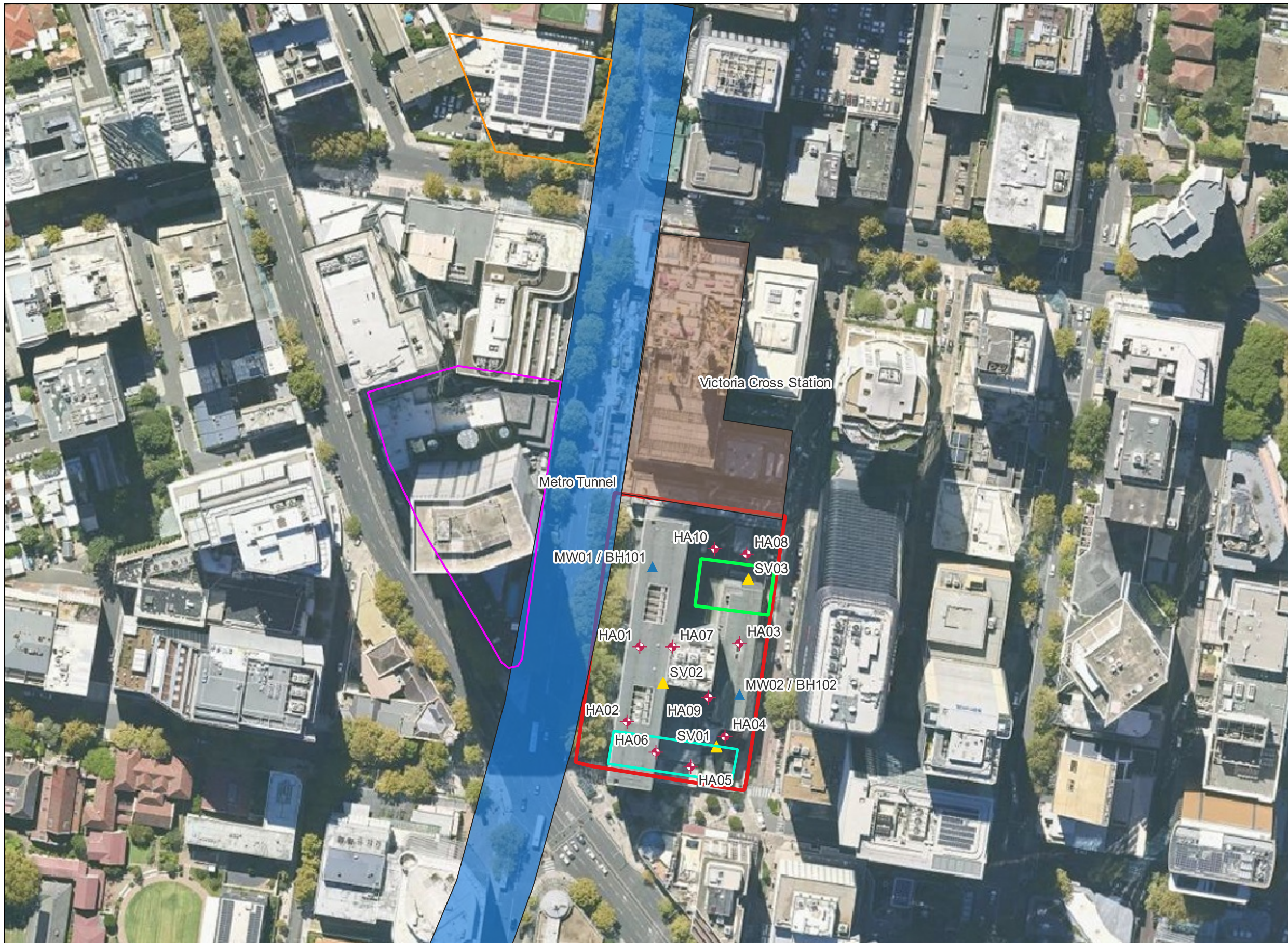
The existence of the LTEMP is to be publicly notified, such as be noting on the Section 10.7 Certificate.

9. Conclusions

It is considered that contamination potentially present at the site could, if required, be managed long term to render the site suitable for the proposed development.

Appendix A

Drawings



SITE LOCATION

LEGEND

Potential contaminant sources

- Potential off-site source (Former dry-cleaners, former diesel engine distributor and former chemical manufacturer)
- Potential off-site source (Former dry cleaners, former plastic manufacturer)
- Former on-site dry cleaner
- Potential location of former on-site dry cleaner

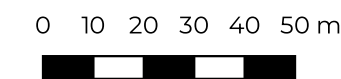
DSI Sampling Points:

- ◆ Hand auger location
- ▲ Groundwater well location
- ▲ Soil vapour pin location

Features

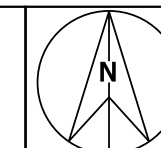
- Metro Tunnel
- Victoria Cross Station
- Site Boundary

NOTE:
 1. Drawing projection in GDA2020 / MGA zone 56, adapted from aerial imagery from "MetroMap"
 2. All locations and features and approximate only

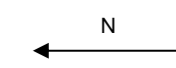
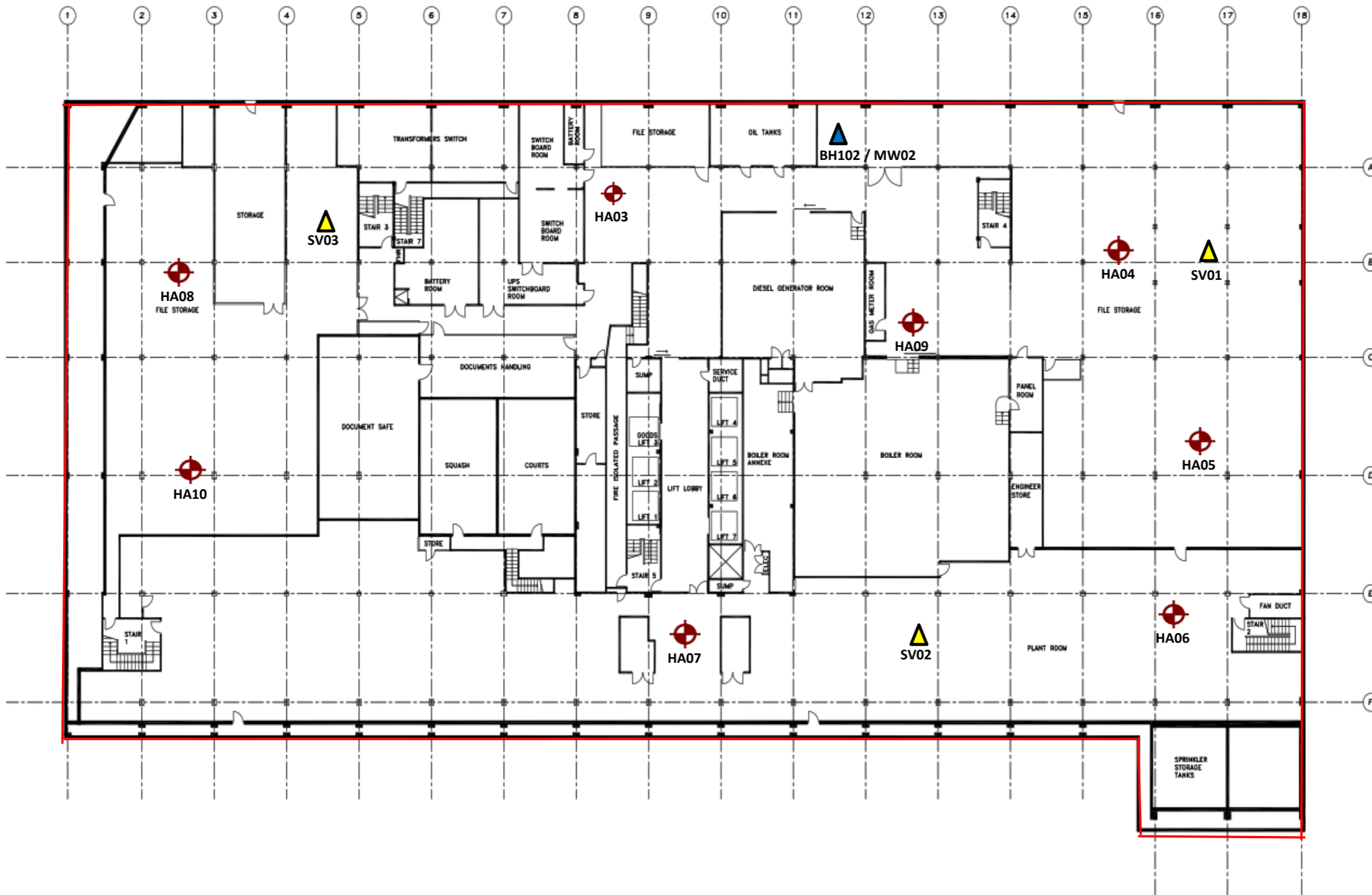


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OFFICE: Sydney	DRAWN BY: WFY/HY
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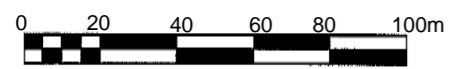
TITLE: **Site locations, boundaries and potential sources of contamination
 Proposed Redevelopment
 105 Miller Street, North Sydney, NSW**



PROJECT: 86964.05
DRAWING No: 1
REVISION: 0



- LEGEND**
- Site Boundary
 - DSI Boreholes
 - DSI Soil Vapour Ports
 - DSI Groundwater Well

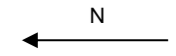
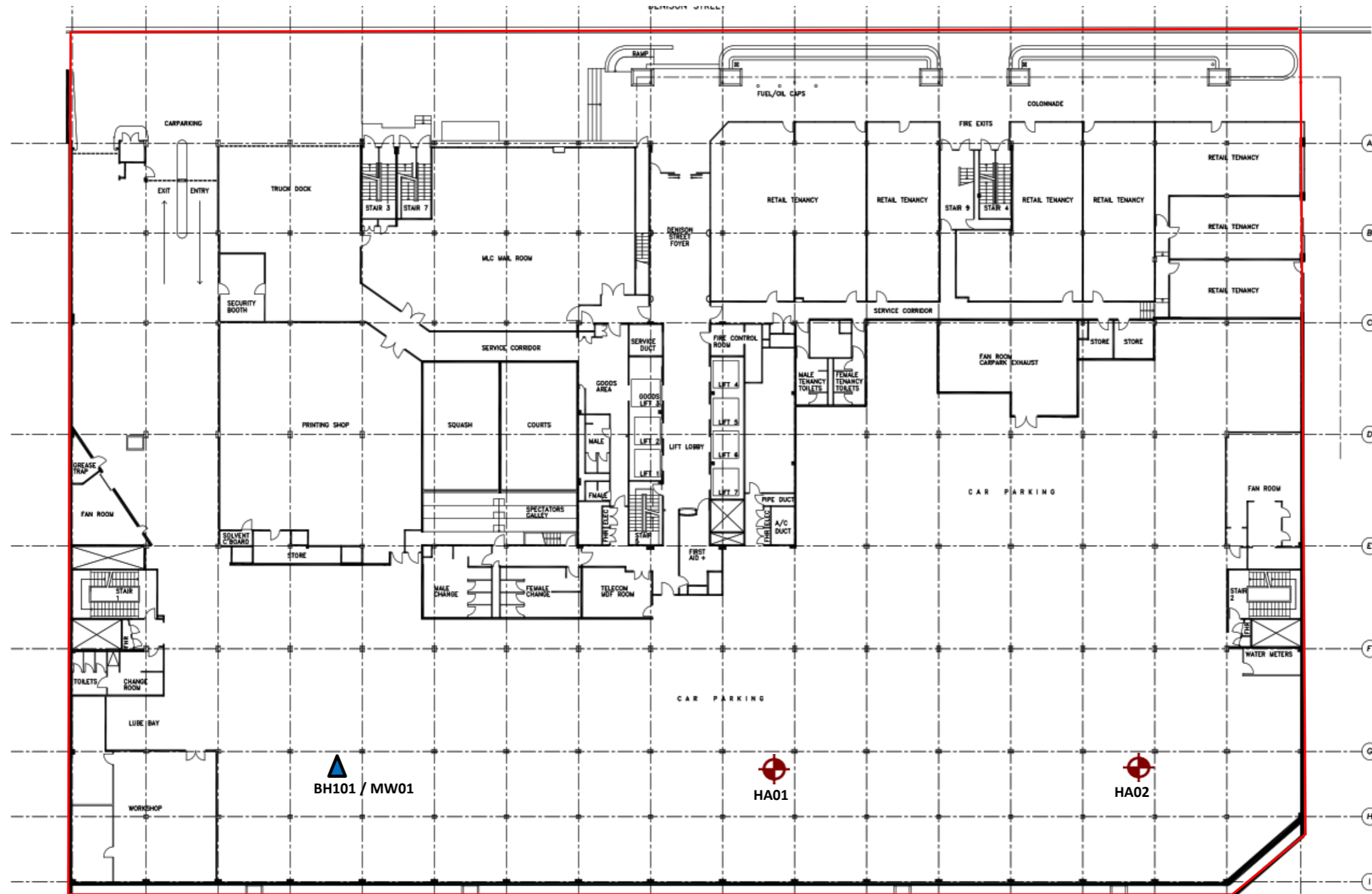


Notes: Test locations are approximate only. Basemap extracted from client supplied site plans.



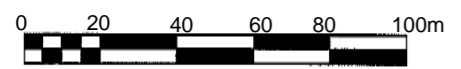
CLIENT: Investa Custodian (2) Pty Ltd	
OFFICE: SYD	DRAWN BY: IR/WFY
SCALE: as shown	DATE: 10 June 2025

TITLE: Test Location Plan (Basement Level) Proposed Redevelopment 105 Miller Street, North Sydney, NSW	PROJECT No: 86964.05
	DRAWING No: D.002
	REVISION: 0



MOUNT STREET ARCADE

- LEGEND**
- Site Boundary
 - ⊕ DSI Borehole
 - ▲ DSI Groundwater Well



Notes: Test locations are approximate only. Basemap extracted from client supplied site plans.



CLIENT: Investa Custodian (2) Pty Ltd	
OFFICE: SYD	DRAWN BY: IR/WFY
SCALE: as shown	DATE: 10 June 2025

TITLE: **Test Location Plan (Lower Ground Level)**
Proposed Redevelopment
105 Miller Street, North Sydney, NSW

PROJECT No:	86964.05
DRAWING No:	D.003
REVISION:	0

Appendix B

Notes About This Report

Introduction

These notes have been provided to amplify DP's report in regard to classification methods, field procedures and the comments section. Not all are necessarily relevant to all reports.

DP's reports are based on information gained from limited subsurface excavations and sampling, supplemented by knowledge of local geology and experience. For this reason, they must be regarded as interpretive rather than factual documents, limited to some extent by the scope of information on which they rely.

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This report is the property of Douglas Partners Pty Ltd. The report may only be used for the purpose for which it was commissioned and in accordance with the Conditions of Engagement for the commission supplied at the time of proposal. Unauthorised use of this report in any form whatsoever is prohibited.

Borehole and Test Pit Logs

The borehole and test pit logs presented in this report are an engineering and/or geological interpretation of the subsurface conditions, and their reliability will depend to some extent on frequency of sampling and the method of drilling or excavation. Ideally, continuous undisturbed sampling or core drilling will provide the most reliable assessment, but this is not always practicable or possible to justify on economic grounds. In any case the boreholes and test pits represent only a very small sample of the total subsurface profile.

Interpretation of the information and its application to design and construction should therefore take into account the spacing of boreholes or pits, the frequency of sampling, and the possibility of other than 'straight line' variations between the test locations.

Groundwater

Where groundwater levels are measured in boreholes there are several potential problems, namely:

- In low permeability soils groundwater may enter the hole very slowly or perhaps not at all during the time the hole is left open;
- A localised, perched water table may lead to an erroneous indication of the true water table;
- Water table levels will vary from time to time with seasons or recent weather changes. They may not be the same at

the time of construction as are indicated in the report; and

- The use of water or mud as a drilling fluid will mask any groundwater inflow. Water has to be blown out of the hole and drilling mud must first be washed out of the hole if water measurements are to be made.

More reliable measurements can be made by installing standpipes which are read at intervals over several days, or perhaps weeks for low permeability soils. Piezometers, sealed in a particular stratum, may be advisable in low permeability soils or where there may be interference from a perched water table.

Reports

The report has been prepared by qualified personnel, is based on the information obtained from field and laboratory testing, and has been undertaken to current engineering standards of interpretation and analysis. Where the report has been prepared for a specific design proposal, the information and interpretation may not be relevant if the design proposal is changed. If this happens, DP will be pleased to review the report and the sufficiency of the investigation work.

Every care is taken with the report as it relates to interpretation of subsurface conditions, discussion of geotechnical and environmental aspects, and recommendations or suggestions for design and construction. However, DP cannot always anticipate or assume responsibility for:

- Unexpected variations in ground conditions. The potential for this will depend partly on borehole or pit spacing and sampling frequency;
- Changes in policy or interpretations of policy by statutory authorities; or
- The actions of contractors responding to commercial pressures.

If these occur, DP will be pleased to assist with investigations or advice to resolve the matter.

continued next page

About this Report

Site Anomalies

In the event that conditions encountered on site during construction appear to vary from those which were expected from the information contained in the report, DP requests that it be immediately notified. Most problems are much more readily resolved when conditions are exposed rather than at some later stage, well after the event.

Information for Contractual Purposes

Where information obtained from this report is provided for tendering purposes, it is recommended that all information, including the written report and discussion, be made available. In circumstances where the discussion or comments section is not relevant to the contractual situation, it may be appropriate to prepare a specially edited document. DP would be pleased to assist in this regard and/or to make additional report copies available for contract purposes at a nominal charge.

Site Inspection

The company will always be pleased to provide engineering inspection services for geotechnical and environmental aspects of work to which this report is related. This could range from a site visit to confirm that conditions exposed are as expected, to full time engineering presence on site.

