

26 February 2018

Our ref: SYDEN203357-L02 NSW Ports Enfield ILC

NSW Ports  
Brotherson House  
Level 2, Gate B103 Penrhyn Road, Port Botany NSW

Attention: Matthew Fahey

Dear Matthew

**Site Suitability Letter, Lots 1 – 4,19 and 20, Enfield ILC**

## **1. Introduction**

NSW Ports engaged Coffey Services (Coffey) to provide a Site Suitability Letter in relation to the proposed redevelopment of Lots 1 – 23 in Deposited Plan (DP) 1183316 at the Enfield Intermodal Logistics Centre (ILC) located on Cosgrove Road, Strathfield South NSW (the site).

The site boundary and lots are illustrated in Figure 3 of the 'Figures' section.

NSW Ports in association with Goodman Property Services Pty Ltd (Goodman) are planning to develop the site which would include the construction of a number of warehouses and other structures at the site.

## **2. Background**

It is understood that NSW Ports development partner Goodman are preparing an application approval for Enfield ILC, which is seeking to modify the previously approved built form including site layout, building footprints and building heights to a maximum of 13.7 metres. With additional modifications including extending 24/7 operating hours, permit warehouse and distribution uses.

A request for a Secretary's Environmental Assessment Requirements (SEARS) was prepared by Urbis Pty Ltd (Urbis) on behalf of Goodman, detailing the proposed Modification 14 (MOD14) to facilitate the issuance of the SEARS by the Department of Planning & the Environment.

Assessment and remediation has previously been undertaken at the site, following which Site Audit Statements (SAS) were issued by a NSW EPA Accredited Auditor for majority of the lots comprising the site as detailed in Section 5.

It is understood that currently Lots 1 – 4 and part of lot 19 and Lot 20 have not been issued SAS's. While remediation of these lots has not yet been undertaken, given the similar historical site use across the site at large, it is likely that similar remedial and management approaches adopted on other portions of the site can be applied to these remaining lots to be made suitable for the proposed commercial/industrial land use. Following completion of remedial works, SAS's are to be issued for Lots 1 – 4, 19 and 20.

Coffey has previously undertaken remediation and validation activities at the site, Lot 3 is currently being used to temporarily store stockpiled impacted fill. It is understood that Goodman plans to retain this material and encapsulate it on-site as part of the redevelopment.

### **3. Objective**

The objective of this Site Suitability Letter is to provide an indication on whether the proposed changes in MOD14 can be undertaken on lots that have previously been issued a SAS, and whether Lots 1 – 4, 19 and 20 can be made suitable for the proposed commercial/industrial land use.

### **4. Scope of Works**

To fulfil the objectives Coffey undertook the following scope of works:

- A review of current Site Audit Statements (SAS) for the site;
- Provision of commentary on the suitability of Lots 1 – 4, 19 and 20 for the proposed commercial/industrial land use following the completion of construction works; and
- Provision of recommendations.

### **5. Document Review**

#### **Site Audit Statement – Proposed Lots 5, 11, 12, 13, 16, 17 and 23 Intermodal Logistics Centre at Enfield – ENVIRON Australia Pty Ltd, 9<sup>th</sup> December 2013 (Audit Number: GN 401-5B)**

Graeme Nyland of ENVIRON issued a Site Audit Statement for Lots 5, 11, 12, 13, 16, 17 and 23 for the site in December 2013 for the purpose of determining the land use suitability. It was determined that these lots were suitable for commercial/industrial land use subject to compliance with the following management plans:

- Enfield Intermodal Logistics Centre Site Management Plan. Empty Container Storage Area A – Final, 22 October 2013, NSW Ports; and
- Enfield Intermodal Logistics Centre Site Management Plan. Intermodal Terminal Area – Final, 22 October 2013, NSW Ports.

The SAS indicated that remedial works included the placement of asbestos-impacted fill material into purpose built encapsulation containment cells within proposed Lot 11, and the capping of potentially asbestos impacted materials on proposed Lots 11, 12 and 16. Ongoing environmental management plans were to be implemented for these lots and required the surface of the site is maintained until redeveloped for the purposed commercial activities with long term site management required.

**Site Audit Statement – Proposed Lots 6, 8, 9, 10 and part of lot 22 Intermodal Logistics Centre at Enfield – ENVIRON Australia Pty Ltd, 29<sup>th</sup> August 2014 (Audit Number: GN 401-6B)**

Graeme Nyland of ENVIRON issued a Site Audit Statement for proposed Lots 5, 11, 12, 13, 16, 17 and 23 for the site in August 2014 for the purpose of determining the land use suitability. It was determined that these lots were suitable for commercial/industrial land use subject to compliance with the following management plans:

- Enfield Intermodal Logistics Centre Site Management Plan. Warehouses A and B, January 2014, NSW Ports;
- Enfield Intermodal Logistics Centre Site Management Plan. Area D, January 2014, NSW Ports;
- Enfield Intermodal Logistics Centre Site Management Plan. Internal Roads and Basin F, January 2014, NSW Ports; and
- Enfield Intermodal Logistics Centre Site Management Plan. Area F, January 2014, NSW Ports.

**Site Audit Statement – Part of Proposed Lot 22 Intermodal Logistics Centre at Enfield – ENVIRON Australia Pty Ltd, 8<sup>th</sup> October 2014 (Audit Number: GN 401-7B)**

Graeme Nyland of ENVIRON issued a Site Audit Statement for part of proposed Lot 22 for the site in October 2014 for the purpose of determining the land use suitability. It was determined that this lot was suitable for commercial/industrial land use subject to compliance with the following management plan:

- Enfield Intermodal Logistics Centre Site Management Plan. Internal Roads and Basin F, January 2014, NSW Ports.

**Site Audit Statement – Proposed Lot 7, 18 and Part of Lots 22 and 4 Intermodal Logistics Centre at Enfield – ENVIRON Australia Pty Ltd, 27<sup>th</sup> November 2014 (Audit Number: GN 401-8B)**

Graeme Nyland of ENVIRON issued a Site Audit Statement for proposed Lots 5, 11, 12, 13, 16, 17 and 23 for the site in November 2014 for the purpose of determining the land use suitability. It was determined that these lots were suitable for commercial/industrial land use subject to compliance with the following management plan:

- Site Management Plan – Validation Area 5. Warehouses C, Administrative Area and Basin B Enfield Intermodal Logistics Centre, November 2014, NSW Ports;

**Site Audit Statement – Part of Proposed Lot 19 Intermodal Logistics Centre at Enfield – ENVIRON Australia Pty Ltd, 16<sup>th</sup> May 2016 (Audit Number: GN 401-7B)**

Graeme Nyland of ENVIRON issued a Site Audit Statement for part of proposed Lot 19 for the site in May 2016 for the purpose of determining the land use suitability. It was determined that these lots were suitable for public open spaces (public footpath and viewing area) land use subject to compliance with the following management plan:

- Enfield Intermodal Logistics Centre Site Management Plan – Southern Precinct, February 2016, NSW Ports.

## **6. Conclusion and Recommendations**

Lots which have previously been issued a SAS are suitable for commercial/industrial land use provided the proposed changes outlined in MOD14 are undertaken in accordance with the applicable management plans and the site management plan is updated to reflect these changes such as the placement and encapsulation of contaminated material.

Lots 1 – 4 and 19 can be made suitable for commercial/industrial land use provided the following be undertaken:

- Development of a remedial action plan (RAP) outlining the remediation strategy for Lots 1 – 4, 19 and 20, and would also include details for onsite encapsulation of the stockpiled material located on Lot 3, which is to be retained on-site;
- Following completion of the works, the Long Term Environmental Management Plan (LTEMP) should be updated to reflect any changes on-site including documenting where impacted soil has been placed and encapsulated;
- Validation sampling be undertaken where required.

For and on behalf of Coffey

A handwritten signature in black ink, appearing to read 'Simon Hay', written in a cursive style.

Simon Hay  
Environmental Consultant

# Important information about your **Coffey Environmental Report**

## **Introduction**

This report has been prepared by Coffey for you, as Coffey's client, in accordance with our agreed purpose, scope, schedule and budget.

The report has been prepared using accepted procedures and practices of the consulting profession at the time it was prepared, and the opinions, recommendations and conclusions set out in the report are made in accordance with generally accepted principles and practices of that profession.

The report is based on information gained from environmental conditions (including assessment of some or all of soil, groundwater, vapour and surface water) and supplemented by reported data of the local area and professional experience. Assessment has been scoped with consideration to industry standards, regulations, guidelines and your specific requirements, including budget and timing. The characterisation of site conditions is an interpretation of information collected during assessment, in accordance with industry practice,

This interpretation is not a complete description of all material on or in the vicinity of the site, due to the inherent variation in spatial and temporal patterns of contaminant presence and impact in the natural environment. Coffey may have also relied on data and other information provided by you and other qualified individuals in preparing this report. Coffey has not verified the accuracy or completeness of such data or information except as otherwise stated in the report. For these reasons the report must be regarded as interpretative, in accordance with industry standards and practice, rather than being a definitive record.

## **Your report has been written for a specific purpose**

Your report has been developed for a specific purpose as agreed by us and applies only to the site or area investigated. Unless otherwise stated in the report, this report cannot be applied to an adjacent site or area, nor can it be used when the nature of the specific purpose changes from that which we agreed.

For each purpose, a tailored approach to the assessment of potential soil and groundwater contamination is required. In most cases, a key objective is to identify, and if possible quantify, risks that both recognised and potential contamination pose in the context of the agreed purpose. Such risks may be financial (for example, clean up costs or constraints on site use) and/or physical (for example, potential health risks to users of the site or the general public).

## **Limitations of the Report**

The work was conducted, and the report has been prepared, in response to an agreed purpose and scope, within time and budgetary constraints, and in reliance on certain data and information made available to Coffey.

The analyses, evaluations, opinions and conclusions presented in this report are based on that purpose and scope, requirements, data or information, and they could change if such requirements or data are inaccurate or incomplete.

This report is valid as of the date of preparation. The condition of the site (including subsurface conditions) and extent or nature of contamination or other environmental hazards can change over time, as a result of either natural processes or human influence. Coffey should be kept apprised of any such events and should be consulted for further investigations if any changes are noted, particularly during construction activities where excavations often reveal subsurface conditions.

In addition, advancements in professional practice regarding contaminated land and changes in applicable statutes and/or guidelines may affect the validity of this report. Consequently, the currency of conclusions and recommendations in this report should be verified if you propose to use this report more than 6 months after its date of issue.

The report does not include the evaluation or assessment of potential geotechnical engineering constraints of the site.

## **Interpretation of factual data**

Environmental site assessments identify actual conditions only at those points where samples are taken and on the date collected. Data derived from indirect field measurements, and sometimes other reports on the site, are interpreted by geologists, engineers or scientists to provide an opinion about overall site conditions, their likely impact with respect to the report purpose and recommended actions.

Variations in soil and groundwater conditions may occur between test or sample locations and actual conditions may differ from those inferred to exist. No environmental assessment program, no matter how comprehensive, can reveal all subsurface details and anomalies. Similarly, no professional, no matter how well qualified, can reveal what is hidden by earth, rock or changed through time.

The actual interface between different materials may be far more gradual or abrupt than assumed based on the facts obtained. Nothing can be done to change the actual site conditions which exist, but

steps can be taken to reduce the impact of unexpected conditions.

For this reason, parties involved with land acquisition, management and/or redevelopment should retain the services of a suitably qualified and experienced environmental consultant through the development and use of the site to identify variances, conduct additional tests if required, and recommend solutions to unexpected conditions or other unrecognised features encountered on site. Coffey would be pleased to assist with any investigation or advice in such circumstances.

### **Recommendations in this report**

This report assumes, in accordance with industry practice, that the site conditions recognised through discrete sampling are representative of actual conditions throughout the investigation area. Recommendations are based on the resulting interpretation.

Should further data be obtained that differs from the data on which the report recommendations are based (such as through excavation or other additional assessment), then the recommendations would need to be reviewed and may need to be revised.

### **Report for benefit of client**

Unless otherwise agreed between us, the report has been prepared for your benefit and no other party. Other parties should not rely upon the report or the accuracy or completeness of any recommendation and should make their own enquiries and obtain independent advice in relation to such matters.

Coffey assumes no responsibility and will not be liable to any other person or organisation for, or in relation to, any matter dealt with or conclusions expressed in the report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in the report.

To avoid misuse of the information presented in your report, we recommend that Coffey be consulted before the report is provided to another party who may not be familiar with the background and the purpose of the report. In particular, an environmental disclosure report for a property vendor may not be suitable for satisfying the needs of that property's purchaser. This report should not be applied for any purpose other than that stated in the report.

### **Interpretation by other professionals**

Costly problems can occur when other professionals develop their plans based on misinterpretations of a report. To help avoid misinterpretations, a suitably qualified and experienced environmental consultant should be retained to explain the implications of the report to other professionals referring to the report and then review plans and specifications produced to see how other professionals have incorporated the report findings.

Given Coffey prepared the report and has familiarity with the site, Coffey is well placed to provide such

assistance. If another party is engaged to interpret the recommendations of the report, there is a risk that the contents of the report may be misinterpreted and Coffey disowns any responsibility for such misinterpretation.

### **Data should not be separated from the report**

The report as a whole presents the findings of the site assessment and the report should not be copied in part or altered in any way. Logs, figures, laboratory data, drawings, etc. are customarily included in our reports and are developed by scientists or engineers based on their interpretation of field logs, field testing and laboratory evaluation of samples. This information should not under any circumstances be redrawn for inclusion in other documents or separated from the report in any way.

This report should be reproduced in full. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties.

### **Responsibility**

Environmental reporting relies on interpretation of factual information using professional judgement and opinion and has a level of uncertainty attached to it, which is much less exact than other design disciplines. This has often resulted in claims being lodged against consultants, which are unfounded. As noted earlier, the recommendations and findings set out in this report should only be regarded as interpretive and should not be taken as accurate and complete information about all environmental media at all depths and locations across the site.

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## Figures







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