

4 June 2018

Our ref: SYDEN203357-L02 NSW Ports Enfield ILC-Rev1

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

Attention: Matthew Fahey

Dear Matthew

Status of Site Suitability
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 boundaries and numbers of lots are illustrated in Figure 1.

NSW Ports in association with Goodman Property Services Pty Ltd (Goodman) is 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 is preparing an application for development 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.

Lots 1 – 4 and part of lot 19 and Lot 20 have been the subject of a Section B SAS (Site Audit Statement GN401-2A, July 2009) in which the auditor expressed an opinion that the subject land can be made suitable for commercial industrial use if the site is remediated in accordance with the *Remediation Action Plan for Known Contamination Intermodal Logistics Centre @ Enfield dated 23 June 2009 by Coffey*.

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 as outlined in the aforementioned Remediation Action Plan (RAP). Following completion of remedial works, Section A SASs are to be issued for Lots 1 – 4, 19 and 20.

Coffey has previously undertaken remediation and validation activities at the ILC. Lot 3 is currently being used to temporarily stockpile impacted fill. It is understood that Goodman plans to retain this material beneath an on-site cap as part of the proposed 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 GN 401-2A and Site Audit Report – Remediation Action Plan Intermodal Logistics Centre @ Enfield, 2 July 2009

Graeme Nyland of ENVIRON issued a Site Audit Statement for Part Lot 2 DP 1006861 and Part Lot 14 DP 1007302 (which were later subdivided as Lots 1 to 21 of DP 1183316) in which the auditor expressed an opinion that the subject land can be made suitable for commercial industrial use if the site is remediated in accordance with the following document:

- *Remediation Action Plan dated 23 June 2009 (Ref: ENVIRHOD00634AA)*, Prepared by Coffey Environments

Site Audit Statement – Proposed Lots 5, 11, 12, 13, 16, 17 and 23 Intermodal Logistics Centre at Enfield – ENVIRON Australia Pty Ltd, 9th 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, 29th 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, 8th 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, 27th 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, 16th 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 are undertaken:

- Development is undertaken in accordance with the existing RAP, where required, updated to comply with the current guidelines;
- 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 suitably capped;
- Validation sampling be undertaken where required.

For and on behalf of Coffey



Sam Gunasekera

Principal

Figure

