

Tiberius (Holroyd) Pty Ltd
PO Box R1839
ROYAL EXCHANGE NSW 1225

Project 84770.01
16 September 2015
PMO

Attention: Mr Kurt Robinson

Dear Sirs

**Comments Relating to Further Investigations and Remediation
1 Crescent Street, Holroyd**

It is understood that Holroyd City Council has requested a Detailed Site Investigation and possibly a Remediation Action Plan prior to further consideration of the rezoning proposal for the above site. Douglas Partners previously prepared a *Report on Contamination Risks Rev0* (Project 84770.00 dated 21 May 2015) to support the rezoning proposal. This report detailed the contamination risks in relation to the rezoning, and included a level of information greater than a Preliminary Site Investigation that is usually prepared to support a rezoning proposal. The report also commented that:

"Although further investigations and consideration of various issues in relation to contamination will be required when planning future development works, there is nothing to suggest that rezoning of the site for high-density residential, commercial/retail and open space land uses cannot be undertaken from a contamination perspective. The site is likely to require remediation and/or engineering solutions to make it suitable for redevelopment."

The purpose of the rezoning application is to receive in-principle approval for the redevelopment of the site from a planning perspective. The rezoning does not provide approval for the individual components of the development, but rather allows for redevelopment subject to meeting other statutory requirements such as those outlined in the *Contaminated Land Management Act 1997*.

Almost all (if not all) sites in Sydney could be made suitable for the type of redevelopment proposed, subject to successful remediation where necessary. The extreme case on this site would be to excavate and remove all contaminants. This would not be the preferred remediation strategy but simply exemplifies the fact that any site can be remediated from a technical perspective.

Detailed Site Investigation and the preparation of a Remediation Action Plan are considered most appropriate once rezoning approval has been granted, and subsequently conditioned as part of the approval. Reasons for this include:

- Investigation and remediation is development and building-specific, and cannot be adequately undertaken or planned at this very early stage in the development. Assumptions about a Masterplan made at the pre-rezoning stage will inevitably change, resulting in the unnecessary duplication of work; and
- The costs associated with this work will be significant, and Tiberius has no certainty that the rezoning approval will be granted.

It is therefore considered that Holroyd City Council should be able to be satisfied that the site can be made suitable for the proposed redevelopment (as outlined in our previous report) and include provisions in the environmental planning instrument (i.e. the rezoning approval) to require Detailed Site Investigation and the preparation of a Remediation Action Plan to be undertaken prior to redevelopment of the site rather than prior to rezoning.

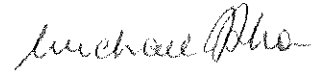
Please contact the undersigned if further information is required.

Yours faithfully
Douglas Partners Pty Ltd



Peter Oitmaa
Senior Associate

Reviewed by



Michael J Thom
Principal