7 April 2026

ErSed Reference: 25024-ERMR-05-260407

Nico Tjen
Director, Icon Oceania Kemps Development Pty
10/350 Kent St, Sydney, NSW 2000

Re: SSD 23480429 – Westgate Industrial Estate at 253-267 Aldington Road, Kemps Creek

Environmental Representative: Monthly Report (ERMR #05)

Condition of Approval A48(k) for SSD 23480429 requires that the ER:

"*prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an **Environmental Representative Monthly Report** providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports." The **Environmental Representative Monthly Repor**t must be submitted within **seven calendar days** following the end of each month for the duration of the ER's engagement for the development, or as otherwise agreed with the Planning Secretary".*

This report has been prepared in accordance with condition A48 (k) of the Development Consent and covers the period from 1 March 2026 to 31 March 2026.

The following report is to be provided to the Planning Secretary in response to this direction.

Please contact me if you require further information.

Sincerely,

Richard Peterson

Associate, ErSed Environmental Pty Ltd
Environmental Representative for SSD 23480429

SSD 23480429 – Westgate Industrial Estate
253-267 Aldington Road, Kemps Creek
Environmental Representative Monthly Report (ERMR #05)
For the period 1 March 2026 to 31 March 2026

<table>
<tr><td>1.</td><td>Construction activities carried out during the reporting period</td><td>Construction of Westgate Industrial Estate are currently being performed by Simmons Civil Contracting (Simmons).
The following works were being undertaken during the reporting period:
<u>Main construction Simmons</u>
Rectification of unsuitable material
Fill import and blending,
Topsoil stripping and stockpiling were completed for Lots 1B and 1C.</td></tr>
<tr><td>2.</td><td>Proposed upcoming construction works (where known)</td><td>The following works are expected in the next period:
<u>Main construction Simmons</u>
Unsuitable fill rectification and fill import for Lots 1B and 1C
Sewer alignment preparation
RD1 preparation and construction
Basin 1 dewatering and subgrade roll testing.</td></tr>
<tr><td>3.</td><td colspan="2">ER activities undertaken during this reporting period.</td></tr>
<tr><td>3 (a)</td><td>Site inspections</td><td>During the reporting period, ER carried out the following inspections:
<table><tr><th>Date</th><th>Key Observations</th></tr><tr><td>12/03/2026</td><td>Site inspection conducted with DPHI.
Early works ongoing: excavation and stockpiling of unsuitable material.
Opportunity identified for in-house Erosion and Sediment Control (ESC) training and provision of advisory dewatering signage at the sediment basin to prevent unauthorised discharge
Notable practices observed: effective reuse of mulch for bunding and ground stabilisation.
Site access stabilisation with wheel wash completed—previously highlighted as critical in ER inspection.
CPESC monthly reports to be revised to serve as an Audit per Condition B21(d).
ERSED Plan to be reviewed/updated to account for upstream flows entering the clean water diversion drain; approval from ER and DPHI required.
Agreed actions for maintenance of existing controls around the clean water diversion.</td></tr><tr><td>26/03/2026</td><td>Potential risks identified: Adjoining developments may discharge into the clean water drain, particularly affecting spillway stabilisation north of the drain.
Long-term management: Northern boundary clean water drain batter requires a durable solution to prevent ongoing rill erosion.
Clarification needed: Misunderstanding noted between SCC and project CPESC regarding prior ER/DPHI inspection requirement-“ERSED Plan to be reviewed and updated to account for upstream flows entering the clean water diversion drain; ER and DPHI approval required.”
Earthworks progress: Excavation and management of unsuitable material continuing; importation of rocky fill materials underway.
Potential contamination discovered: SCC reported material isolated pending testing and advice from Site Contamination consultant and Site Auditor (SA).
Unexpected Contamination Finds Procedure: Implementation discussed in line with Condition B57; procedure to document process and long-term management of material, potentially retained on site as part of remediation, subject to SA approval (refer Item 8, Recommendation 2: reporting to DPHI).
Compliance discussion: Requirements of Conditions B53-B56 were reviewed with relevant stakeholders.</td></tr></table>A selection of photographs taken as part of inspections is provided, with comments, at section 15.</td></tr>
<tr><td>3 (b)</td><td>Audits undertaken</td><td>No audits were undertaken during the reporting period.</td></tr>
</table>

4. Audits/ Inspections by Others

A summary of the observation from CPESC monthly reports prepared is provided below.

Date	Key Observations
March 2026	The monthly CPESC Audit report was not provided to the ER at the time of reporting.

5. Summary of Community Consultation

The CCS includes the register of consultation and communication for the Project.

A summarised extract for the reporting period is provided as Attachment 1.

6. Summary of Complaints

No complaints were received during the reporting period.

Date	Details
NIL	

7. Summary of Incidents

During the reporting period, no incidents were reported to the Planning Secretary.

Date	Details
NIL	

8. Summary of Non-Compliances

During the reporting period, no non-compliances were reported to the Planning Secretary.

Date	Details
NIL	

9. Evaluation of Environmental Performance

The ER's evaluation of Environmental Performance is based on:

- Review of monitoring data for dust, noise and traffic
- Review of complaints and incidents
- Monthly CPESC Audit report
- Stakeholder feedback
- ER site inspections.

Further discussion of environmental performance is presented below.

NOISE

Month	Noise Levels	Comments
Simmons		
March 2026	Noise levels during the reporting period ranged between 55 dB(A) and 74 dB(A) LAeq.	• All recorded noise levels were below the highly impacted Noise Management Level (NML) of 75dB(A).

Recommendations – Noise

Should any complaints be received, attended monitoring is undertaken at the complaints residence to accurately determine whether (or not) the noise management levels are complied with and whether any further management actions are required.

DUST

Dust Sampling was conducted in accordance with the Construction Air Quality Management Plan (CAQMP).

The real time dust monitors provide an instantaneous measure of potential air quality impacts. This method determines real-time (continuous) dust concentrations. This method enables determination of airborne dust concentrations at a point in time. Realtime monitoring results show short-term variations and are strongly influenced by weather (wind direction, humidity, rainfall) and immediate site activities. As for high volume samplers, when matched with records of wind data, this method enables determination of dust levels from a particular event or source.

The real time air quality criteria as described in the CAQMP are presented in the table below.

Pollutant	Averaging Period	Air Quality Criteria	Application
Particulate matter less than 10 micrometres in diameter (PM_{10})	Annual	25 µg/m^3	Off-site receiver
	24-hour	50 µg /m^3	Off-site receiver
Particulate matter less than 2.5 micrometres in diameter ($PM_{2.5}$)	Annual	8 µg /m^3	Off-site receiver
	24-hour	25 µg /m^3	Off-site receiver

A summary of results for the reporting period is provided below:

Month	Details of Exceedances	Comments
Simmons		
March 2026	NIL	• The rolling averages for particulate matter PM2.5 was below the limit (8µg /m^3) during the reporting period.
	NIL	• The rolling averages for particulate matter (PM10) was below the limit (25µg /m3) during the reporting period.

Recommendations - Dust

Construction works should continue to prioritize ongoing visual monitoring, weather forecasting, and adjustments to work practices during hot, dry, and windy conditions. Additional measures outlined in previous ER monthly reports should also remain in effect, including:

- Planned and focused application of water on designated haul routes.
- Retention of vegetative ground cover and temporary stabilization/ground cover in non-active work areas.
- Provision of ground stabilisation for completed work areas as soon as reasonably practicable

TRAFFIC

The CTMP plan approved construction site traffic restrictions per day (7:00 am to 6:00 pm).

It was reported that no heavy vehicle movements occurred during the March 2026 reporting period.

Recommendations - Traffic

- Continue to monitor and manage on site with regular toolbox talks with new suppliers and subcontractors to site identifying the importance of following the CTMP code of conduct.

10. Analysis of lessons learnt and opportunities for improvement

Areas for improvement are noted as follows:

- Timeliness of completion of closeout of ER inspection actions
- The content and focus of CPESC inspections should be reviewed so they satisfy the requirements of Condition B21 (d), which requires an audit rather than a routine inspection. Reports submitted to date are therefore non-compliant with the requirements of Condition B21.
- Submission of CPESC reports to the ER prior to submission of the ER report

11. Project Changes

Changes to the project that occurred during the reporting period are listed in the table below.

Documentation	Version and Date (Author)
NIL	

12. Any meetings attended by ER

The ER has been involved in the following meetings.

Date	Details
17/03/2026	Mamre Road Working Group Meeting – minutes available on request

13. Summary of documents issued by the ER

The following documents were issued by the ER.

Date	Details
NIL	

14. Closing Remarks

Ongoing issues remain, including instability and rill erosion within the clean water diversion channel, and continued risk of turbid inflows from adjacent northern developments, with the required ESCP amendment for ER endorsement and DPHI Approval) still outstanding. Unexpected contamination was identified during earthworks; the procedure has been initiated, however formal documentation and reporting to DPHI is required in accordance with Condition B57. The CPESC report for March was not provided to the ER for review. As noted in previous reports, CPESC reporting also requires revision to align with audit requirements under Condition B21(d), and several actions from previous ER inspections remain unresolved.

Priority actions include progressing long-term stabilisation of the clean water diversion channel, submission of the ESCP amendment for approval, and completion of contamination reporting within the required timeframe.

Overall, environmental performance was acceptable, however timely close-out of actions and improved coordination with adjacent developments (particularly in relation to turbid water inflows) is required to ensure compliance.

15.

Photo	Location and comment	Resolution/Action/Project Response
	<u>Clean Water Diversion Drain 3 – 19/02/2026</u> In some locations along the CWD, it appears dispersive soils above the geofabric lining may be exposed to rainfall, risking potential for water quality impacts within the CWD. **Recommendation** Consult with CPESC re: ongoing stabilisation measures. Note 1: establishment of ground covers via vegetation (seed) or Erosion Control Products (ECPs) were discussed as potentially effective. Note 2: The approved ESCP Drawing SHEET 4 provides "L.2 – DRAIN LINING: a. Seeding& VITAL P47 (or Stonewall) + Jute Matting. C – Seeding to be a combination of cover crop (Japanese millet for Summer months) and a suitable perennial (long term) local native grass mix." & "N 2.d) – All exposed surfaces of high-risk areas (ie: steep slopes, batters, surfaces not draining to sediment basins and works in/near waterways and flow areas) will be stabilised with temporary spray-on soil stabilising agents, geotextile or black plastic (securely pinned or equivalent)". Also refer to Table 1 (SHEET 6) – Stabilisation Requirements and Treatment Methods – During Construction (Temporary Stabilisation)	**OBSERVATION** **RISK - MEDIUM** **ER's Observation on 12/03/2026:** The maintenance and stabilisation of the clean water drain appears to be an ongoing issue. Some rolling of the embankment was observed with geofabric needing re -instatement in areas where it had become displaced Refer to item 13 for further details. **STATUS OPEN** **ER's Observation on 26/03/2026:** Hand spread seed is germinating; however, rill erosion still appears active. Implementation of enhanced erosion controls as per ESCP Notes "high risk areas" is required as a priority. **Simmons comments:** Geofab will be placed on all exposed areas shown. To be closed out by 02/04/2026.
	<u>Southern boundary 2 – 19/02/2026</u> There is a risk that sediment laden site runoff flowing along the southern boundary could bypass the sediment basin, under the current levels, and overflow from the informal sediment trap below the basin wall, on the southern side into the "clean water" vegetated zone" in Lot 2. Simmons Civil proposed to install a series of mulch traps. It was agreed that this proposal should be confirmed with the project CPESC, however appeared a reasonable solution at this stage, until changes in site levels are achieved.	**OBSERVATION** **RISK – LOW** **ER's Observation on 12/03/2026** **STATUS CLOSED**

	Lot 2 & Clean Water Drain Outlet – 19/02/2026 An informal "sediment trap" was constructed during construction of the main basin and basin wall / spillway. This serves an important function for sediment retention during stabilisation of ground disturbed during early works. There is a need to improve delineation between this temporary site control and the main Clean Water Drain (CWD). **Recommendation** i) Consult with CPESC re: Suitable controls around existing straw bales and CWD. ii) Establish stabilisation in all areas below Basin 3 as quickly as possible. It was discussed that mulch is likely to for an adequate form of ground-cover iii) Ensure all earthworks including stockpiles are sealed up and vegetated promptly, with potential runoff diverted into Basin 3 where possible	**OBSERVATION** **RISK - MEDIUM** **ER's Observation on 12/03/2026:** A significant amount of mulch has been placed in this area to stabilise the soil and prevent erosion and runoff into the clean water outlet. **STATUS CLOSED**
	Clean Water Diversion Drain 4 – 19/02/2026 New work areas on adjacent development to the North, upslope of the CWD present a risk of fast flowing, turbid water potentially flowing into the CWD, impacting water quality. It is the legal responsibility of each site to manage their own "dirty water" run-off, preventing it from becoming the adjoining sites 'run-on' problem to deal with. **Recommendation** Liaise with neighbouring contractor and make arrangements to ensure run-on water is prevented from accessing the Westgate site. Consult with CPESC re: Suitable site controls. This may include lining disturbed areas with geofabric or similar to minimise turbid runoff, installation of silt fencing, dirty water drains, or sediment trap/sumps/basin.	**OBSERVATION** **RISK - MEDIUM** **ER's Observation on 12/03/2026:** Discussion with SCC/RPI and DPHI on site. Noting the ESCP is required to be amended for ER endorsement and re - submission to DPHI for approval noting any changes to address water discharges from adjacent sites. Refer to item 10 for further details **STATUS OPEN** **ER's Observation on 26/03/2026:** Significant improvement of controls was observed around the Clean Water Drain on the Westgate earthworks side and adjacent culvert works. Risk of sediment pollution from northern neighbouring site basin wall including spillway (with no scour protection) is still evident. No ESCP amendment received by the ER for verification as yet. **STATUS OPEN** **Simmons comments:** CPESC to attend site on Thursday 02/04/2026 to suggest suitable site controls. Liaising with AWJ to install a silt fence/bund to prevent their run off from entering our site.
	Main Access gate – 12/03/2026 Stabilisation of the site access and shaker PAD have been installed with high pressure wheel wash to prevent mud tracking on Abbotts Road.	**OBSERVATION**

	Interface Works – 12/03/2026 High Risk of dirty water runoff from the adjacent construction sites. Recommendation CPESC to update the ESCP for review and endorsement by the ER and submission to DPHI for approval	**OBSERVATION** **RISK HIGH** **ER's Observation on 26/03/2026:** Significant improvement of controls was observed around the clean water drain and adjacent culvert construction area. Note: Issue relating to potential turbid discharges from northern sediment basin & amendment to ESCP remains open. **STATUS CLOSED**
	Clean Water Outlet – 12/03/2026 A significant amount of mulch material has been placed to cover the exposed area directly adjacent to the clean water diversion outlet	**OBSERVATION**
	Clean Water Drain – 12/03/2026 Some evidence of embankment riling on the high side of the clean water drain observed with the potential for contamination of clean water. Challenges with topsoil re growth was discussed. Recommendation Consult with the CPESC and implement appropriate form of stabilisation	**OBSERVATION** **RISK - MEDIUM** **ER's Observation on 26/03/2026:** This is the same issue as above & relates to the exposed soil properties & erodibility. Erosion is still active above the clean water drain & a more robust solution is required, suitable for the life of the project. **STATUS OPEN** **Simmons comments:** Exposed area to be spray grassed/geofab. CPESC to review these controls once completed. To be closed out 09/04/2026 (pending availability).
	Sediment Basin – 12/03/2026 Risk of unauthorised discharge of sediment water off site was discussed with potential consequences noted. A permit to pump system is in place. Recommendation Install advisory signage noting the mandatory requirement for a permit to pump. Review and update site induction and training materials as required.	**OBSERVATION** **RISK - MEDIUM**
	General Maintenance of ERSED controls – 12/03/2026 Ongoing need to check and ensure the adequacy and maintenance of erosion and sediment controls through routine CPESC audit in accordance with Condition B21(d) and internal site inspections in accordance with approved CEMP.	**OBSERVATION** **RISK - MEDIUM** **ONGOING**

		Main Access gate – 26/03/2026 Site access appeared well stabilised during the inspection with vehicles utilising the nominated egress point. No wheel tracking observed.	**OBSERVATION**
		Containment Cell – 26/03/2026 The approved Unexpected Contamination Finds Procedure has been implemented with materials quarantined, awaiting test results from the project Certified Practitioner (Site Contamination). NB: Where excavation is deemed safe, best practice is to stockpile within a bunded area and cover to prevent spread of potential contaminants via rainfall runoff or airborne dust, prior to confirmation of recommendations for management and disposal, which require additional approval from the Independent Site Auditor appointed under Condition B51. **Recommendation 1** Ensure potentially contaminated materials are managed in liaison with the consultant appointed under Condition B52 and confirm recommended safe practice for stabilisation or sealing of active cell area and potentially contaminated stockpile. **Recommendation 2** Document each step of implementing the Isolated Finds Procedure to prepare reporting for submission to DPHI within 6 weeks of the find, in accordance with Condition B57. **Recommendation 3** Recommend SCC deliver a toolbox talk to raise field staff awareness of the risk of potential illegal tipping during the fill import phase, especially for the duration of the cell being 'open'. Include awareness of Condition B67: "Waste generated outside the site must not be received at the site for storage, treatment, processing, reprocessing, or disposal."	**OBSERVATION** **Simmons comments:** As per testing, results for TRH, PAH, BETX and heavy metals have returned below the remedial acceptance criteria as per EGA consultant.

	Previously disturbed land in Lot 2 – 26/03/2026 Mulch material has been placed to stabilise the area in Lot 2 used for desludging the old farm dam. Erosion risk is now significantly reduced, however turbid water pooled in the sediment trap below the basin may be able to mix with clean water flows that have been diverted around the site. **Recommendation:** Consult CPESC and consider installation of additional filtration control, to ensure no direct mixing of site water and diverted upstream water, without passing through a control at this location.	**OBSERVATION** **RISK – LOW** **Simmons comments:** Sandbags were placed in between the clean water drain and the basin catchment to ensure no mixing of site water and diverted upstream water. CPESC to review these controls. 
	Southern Boundary – 26/03/2026 Areas along the southern boundary previously disturbed during construction of the basin are now well stabilised, with additional catch drains diverting runoff into the basin for treatment.	**OBSERVATION**

Attachment 1 – Extract of Consultation and Communication Register

Date	Responsible Rep	In/Out/ Meeting	Initial Communication Method/Tool	Contact Name/ Organisation	Nature of Complaint/Enquiry/ Communication	Summary of Issues/Details of Communication	Status
NIL							