

23 March, 2015

South Kings Properties Pty Ltd on behalf of Precinct 15 Landowner  
Suite 650, 1 Queens Road  
Melbourne Vic 3004

Email: [jadams@cvcventures.com.au](mailto:jadams@cvcventures.com.au)

Dear Jonathan,

**RE: Precinct 15 Rezoning – Environmental**

Following on from our recent correspondence regarding Council's comments on the status of environmental investigations across the precinct, Environmental Assessment Services Pty Ltd (EAS) provide the following information regarding the environmental aspects of the rezoning to residential and mixed use of the precinct.

Council's Precinct 15 "Preliminary Site Assessment and Precinct Remediation Strategy Plan" was prepared during September 2012 to give Council the confidence that the Precinct can accommodate the proposed medium – high residential land use along with public open spaces. In addition, the strategy plan would allow any site contamination issues to be identified at an early stage which could then be given due consideration for the overall design and built form of any development.

Environmental Assessment Services Pty Ltd have undertaken a further review of environmental investigation completed across the Precinct since September 2012. This incorporated a review of a 'Site Assessment Questionnaire' completed by the eight main land holdings represented by the Precinct 15 PCG. Attachment I presents the updated Site Assessment Summary Table for environmental works now completed across the precinct.

Most sites have now progressed through the preliminary stages and into detailed site investigations and associated clean-up works to allow for the proposed land uses as presented in the attached Land Use Plan (Attachment II) and the Environmental Status Plan (Attachment III)

Upon a detailed review of the existing status of works carried out across the Precinct and likely timing associated with future works, the requested level of assessment outlined in Councils "Preliminary Site Assessment and Precinct Remediation Strategy Plan" is beyond what could reasonable and practicable be achieved in a timely manner.

The following multiple lines of evidence are presented to demonstrate that the "Preliminary Site Assessment and Precinct Remediation Strategy Plan" is currently too onerous and it can be demonstrated that Precinct 15 can be cleaned up to suit residential and other sensitive uses, based on the substantial dataset currently available:

- ***Approximately 80% of the Precinct has completed extensive investigation/clean-up works:*** Nine larger sites have completed Stage 1 & Stage 2 Investigations and are progressing to clean-up stages to allow for the proposed land uses. Six of these sites have an Environmental Auditor appointed to facilitate re-zoning requirements.

Two other larger sites have conducted site clean-up works (i.e. removal of primary contaminant sources including underground storage tanks and associated infrastructure).

All completed site investigations have not identified issues that would preclude med-high density residential development or public open space land use.

- **Application of an Environmental Audit Overlay (EAO) safeguard:** All sites within the Precinct will fall within an EAO, ensuring that clean-up is completed prior to Planning Permits/Occupancy Permits.

To date, clean-up works have involved the rudimentary removal of redundant underground infrastructure and contaminated soils, along with appropriate validation sampling and backfilling of exposed surfaces. Groundwater investigations to date have not identified the need to physically clean-up the groundwater, primarily due to the depth to groundwater and the level of contamination identified.

To date there have been no issues which would require onerous site management conditions to be imposed on future land owners. Clean-up works would be completed prior to the issuance of a Certificate / Statement of Environmental Audit with minimal future site management requirements (i.e. importation of clean fill in garden beds or where soils remain accessible).

- **Difficulty in providing too fine a level of detail for the entire precinct:** Of the 31 sites identified within the Precinct, 19 are smaller sites (<10% of the total precinct), whose owners have yet to initiate environmental investigations. This impedes the overall progress to achieve the requirements of the "Preliminary Site Assessment and Precinct Remediation Strategy Plan".

As the smaller sites have yet to embrace the process, it has been the responsibility of the larger surrounding sites to establish a broader understanding of the contamination status of the precinct. This is demonstrated by the installation of over 70 groundwater monitoring wells across the Precinct. As indicated above, intrusive groundwater investigations completed to date have not identified the need to physically clean-up the groundwater to allow residential land-use. This suggests that although the smaller sites have yet to be assessed, no significant groundwater contamination issues have been identified which would preclude the proposed land uses.

- **Staging of assessment, clean-up and clearance:** as there are practical encumbrances in determining clean-up over a large precinct containing many different landowners (some of whom have existing use rights that may continue for some time, and some of whom are yet to determine their development timelines), the onerous approach requested appears to be unsuitable for strategic planning consideration of Precinct 15.

Whilst broad environmental information can be provided currently, further detail can appropriately be sought as the approvals process progresses (Rezoning / Development Plan / Planning Permit Stage).

Given that no sites have yet been issued with a Certificate or Statement of Environmental Audit to allow for more sensitive landuse, Council still have the authority and influence to provide instruction to all relevant parties (i.e. assessors, appointed Environmental Auditors and land owners) that all sites are to be cleaned up to the extent practicable and to keep any future site management requirements on the overall design and built form of any development to a minimum.

Although a number industrial land uses have resulted in some site contamination in areas of the Precinct, the nature and extent of contamination identified to date is not expected to preclude future med-high density residential land use or public open spaces, nor require onerous future site management requirements on Council or future land owners. The EAO safety net for Council would ensure that prior to the issuance of any Certificate or Statement of Environmental Audit, the condition of each land parcel would be suitable for its intended use.

Based on the information provided above, it is recommended that the Precinct be favourably considered for development to allow more sensitive landuse and the EAO surety be applied to facilitate appropriate contaminated land management, ensuring the protection of human health and the environment.

Should you have any queries regarding information presented in this correspondence, please do not hesitate to contact me.

Yours faithfully



**Tony Connolly**  
Environmental Consultant

<b>Attachment I</b>	Site Assessment Summary Table
<b>Attachment II</b>	Environmental Status Plan
<b>Attachment III</b>	Land Use Plan

## **Attachment I**

### **Site Assessment Summary Table**



No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
<b>KYLE ROAD PREMISES:</b>		
<div>Under Section 53X Audit</div> <div>40-68 Kyle Rd (former Gilbertsons)</div>	<div>Phase 1 and Phase 2 Completed</div> <div>Final clean-up works underway</div>	<p>Currently undergoing a Section 53X Statutory Environmental Audit with Nick Owen and Environmental Assessment Services as the site assessor.</p> <p>Historical potentially contaminating land uses included an abattoir and below ground storage and supply of hydrocarbons.</p> <p>Site investigations have included the establishment of 140 soil sample locations and the installation of the twelve groundwater monitoring wells and three rounds of monitoring (standing water levels ranging between 11.820 – 19.668 metres with a general southerly component of flow).</p> <p>Identified contaminants of concern include metals, TPHs, PAHs, VHCs and asbestos.</p> <p>Final stages site clean-up works and completion of audit anticipated within the next six months to allow for residential land use and public open spaces.</p>
<div>8 - 38 Kyle Road (24,500 m<sup>2</sup>)</div>	<div>Phase 1 carried during June – July 2012.</div> <div>Currently undertaking Phase 2 assessment</div>	<p>Historical potentially contaminating land uses included metal works from the 1950's, importation of fill and the underground storage and supply of hydrocarbons. It is understood that the former Caltex Service station located on the corner of Blackshaws Road and Kyle Road occupied part of the site, although was later transferred onto its own separate title.</p> <p>Site investigations have included the establishment of 40 soil sample locations and the installation of the three groundwater monitoring wells and one round of monitoring (standing water levels ranging between 12.85 – 15.58 metres. Groundwater flow calculations are awaiting survey data).</p> <p>Identified contaminants of concern include metals, fluoride, TRHs and PAHs.</p>



No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
65 Kyle Road	-	<p>Site ownership details not provided. A review of historical documentation by the Royal Historical Society of Victoria identified the following information:</p> <p>Altona North is not listed as a suburb in the Sands &amp; McDougall Directories until 1967. From 1967 until 1974 (the final publication of Sands &amp; McDougall), the property numbers on Kyle Road are listed only as far as No. 37. The area is described as residential, with the Forest Commissions of Victoria located along the west side of Kyle Road.</p> <p>The west side of Kyle Road is predominantly residential. This site appears to be located at the 'Fresh Express Fruit and Vegetable' supermarket.</p>
<b>BLACKSHAW ROAD PREMISES:</b>		
292 Blackshaws Road (Taleb Car Sales)	UPSS Decommissioning works (1995)	<p>Site ownership details not provided. Information provided in ESP Phase 1 Assessment for 8 – 38 Kyle Road identified a <i>Certificate of Site Closure, Former Caltex Service Station Facility, Cnr Blackshaws and Kyle Roads, Altona Victoria</i> prepared by OTEK Australia during 1995.</p> <p>It is understood six USTs, associated fuel lines, a TIT, a hydraulic hoist and car wash sump were removed. Validation sampling returned concentrations below the adopted criteria. Excavated soils were treated on-site and backfilled with a <i>Fill Material</i> classification.</p>
296 – 298 Blackshaws Road (AWK Auto Repairs)	-	Site ownership details not provided.



No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
280-288 Blackshaws Road (Secon)  (40,480 m <sup>2</sup> )	Phase 1 & 2 completed July 2011  Site clean-up and validation works 2012	<p>Historical potentially contaminating land uses included fumigation, underground storage of petroleum hydrocarbons, importation of fill (i.e. recycled asphalt) and abattoir stockyard.</p> <p>Site investigations carried out by Cardno Lane Piper have included the establishment of 51 soil sample locations and the installation of the six groundwater monitoring wells and two rounds of monitoring (standing water levels ranging between 14.65 – 16.59 metres with an inconclusive flow direction due to a shallow gradient).</p> <p>Identified contaminants of concern include sulphur, barium, manganese, nickel, vanadium, benzo(a)pyrene, PAH and TPH C10-C36.</p> <p>2 USTs, 2 bowzers and associated pipework were removed in 2012 and residual soils validated.</p> <p>A health risk assessment was conducted on raised PAHs present in shallow soils and concluded that a health risk would be present for future residential land users. Accordingly, appropriate site management procedures would be required for residential land use. In addition, soil assessment works will be required in the former fumigation area and storage shed.</p>
276 Blackshaws (Liberty / United Service Station)		Site ownership details not provided.
270 – 274 Blackshaws Road (Form 700)		Site ownership details not provided.
Under Section 53X Audit		Currently undergoing a Section 53X Statutory Environmental Audit with Peter Beck and Golder Associates as the site assessor.
248-258 & 260-268 Blackshaws Road (55,000 m <sup>2</sup> )	Phase 1 and Phase 2 Completed	<p>Historical potentially contaminating land uses included manufacturing and supply of compressed gases and manufacturing of smallgoods.</p> <p>Site investigations have included the establishment of 73 soil sample locations and the installation of the ten groundwater monitoring wells and two rounds of monitoring (standing water levels ranging between 14.371 – 18.318 metres with a north westerly component of flow).</p> <p>Identified contaminants of concern include metals, TPHs and PAHs.</p> <p>A preliminary remediation strategy has been submitted to the auditor for review.</p>



No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
<div>Under Section 53X Audit</div> <p>232-246 Blackshaws Road (TIC Group) (21,739 m<sup>2</sup>)</p>	<div>53X Audit</div> <p>Phase 1 &amp; 2 carried during 2012 – 2014</p> <p>Previous site assessments carried out between 1997 - 2010</p>	<p>Currently undergoing a Section 53X Statutory Environmental Audit with Sally Bonham and ESP as the site assessor.</p> <p>Historical potentially contaminating land uses included a heavy engineering workshop (metal working and steel fabricating) and use of foundry sands, sub-surface oil reservoirs, abattoir and meatworks.</p> <p>Site investigations have included the establishment of 49 soil sample locations and the installation of the three groundwater monitoring wells and one round of monitoring (standing water levels ranging between 14.9 – 23.9 metres with an easterly component of flow).</p> <p>Identified contaminants of concern include metals, fluoride, TRHs and PAHs.</p> <p>A scope of works for further investigations &amp; clean-up is currently (December 2014) being reviewed by the appointed auditor.</p>
<p>216-230 Blackshaws Road (Commercial)</p>	<p>Statement for commercial/industrial use (1997)</p>	<p>Currently occupied by Apollo Engineering. Formerly part of 216 - 242 Blackshaws Rd. No. 232 Blackshaws Rd was issued with a Section 57AA(2) Statement of Environmental Audit for the continued use of the site for industrial purposes during April 1997.</p> <p>Site investigations identified USTs had impacted local soils (TPHs &gt;C9 - 19,920 mg/kg). Subsequent removal and validation works returned acceptable contaminant levels. Excavated soils were land farmed and possibly backfilled.</p> <p>No groundwater investigation works were undertaken for the purposes of the audit. Statement concluded the site is suitable for on-going commercial/industrial land use.</p>
<div>Under Section 53X Audit</div> <p>200-214 Blackshaws Road (53,000m<sup>2</sup>)</p>	<div>53X Audit</div> <p>Phase 1 &amp; 2 carried during 2012 - 2014</p>	<p>Currently undergoing a Section 53X Statutory Environmental Audit with Sally Bonham and ESP as the site assessor.</p> <p>Historical potentially contaminating land uses included a suspected quarry, cereal and rope manufacturing, underground storage and supply of hydrocarbons and asbestos containing building materials.</p> <p>Site investigations have included the establishment of 75 soil sample locations and the installation of the three groundwater monitoring wells and one round of monitoring (standing water levels ranging between 13.8 – 14.5 metres with an easterly component of flow).</p> <p>Identified contaminants of concern include metals, TRHs and PAHs.</p> <p>A scope of works for further investigations &amp; clean-up is currently (December 2014) being reviewed by the appointed auditor.</p>





No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
<div>Under Section 53X Audit</div> 188-198 Blackshaws Road (ITI Group)	Phase 1 & 2	<p>Currently undergoing Section 53X Statutory Environmental Audit with Nick Owen and ESP as the site assessor.</p> <p>Historical potentially contaminating land uses included a CCA plant, USTs &amp; TIT associated with a garage and maintenance workshop, boiler house containing asbestos, Telstra underground conduits containing asbestos and importation of fill.</p> <p>Site investigations have included the establishment of approximately 500 soil sample locations and the installation of the 15 groundwater monitoring wells and five rounds of monitoring (standing water levels ranging between 13.2 – 15.7 metres with a southerly component of flow).</p> <p>Identified contaminants of concern include metals, asbestos, petroleum hydrocarbons and organochlorine pesticides.</p> <p>Site clean-up works to continue during 2015 to remove asbestos contamination along with contaminated soils and associated infrastructure.</p>
186 Blackshaws Road (panel beaters)	-	Site ownership details not provided.
184 Blackshaws Road (Automotive repairs carriers)	-	Site ownership details not provided.
182 Blackshaws Road (automotive repairs / service station)	-	Site ownership details not provided.
<b>NEW STREET PREMISES:</b>		
98 New Street (automotive repairs – bus depot)	-	Site ownership details not provided.
82 New Street (metal engineering)	-	Site ownership details not provided.
80 New Street (minor car repairs)	-	Site ownership details not provided.
80A New Street (warehouse)	-	Site ownership details not provided.
78A New Street (dry cleaners)	-	Site ownership details not provided.



No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
78 New Street (green grocers/ drycleaners)	-	Site ownership details not provided.
76 New Street (equipment distribution - vacant)	-	Site ownership details not provided.
74 New Street (automotive repairs/ Storage)	-	Site ownership details not provided.
72 New Street (storage)	-	Site ownership details not provided.
70 New Street (storage)	-	Site ownership details not provided.
50 New Street (industrial equipment manufacturing)	-	Site ownership details not provided.
Under Section 53X Audit		Currently undergoing Section 53X Statutory Environmental Audit with Phillip Hitchcock and LRM Global Pty Ltd as the site assessor.
48 New Street	Phase 1 & 2 works (2005 – 2008)	<p>Historical potentially contaminating land uses included mixed industrial usage (i.e. alum factory) and currently used as a builder's storage.</p> <p>Site investigations have included the establishment of 44 soil sample locations and the installation of the 7 groundwater monitoring wells and four rounds of monitoring (standing water levels ranging between 13.74 – 14.7 metres with a southerly component of flow). Identified contaminants of concern include metals and petroleum hydrocarbons. No CUTEP is required.</p> <p>Assessment documentation has been presented to the auditor and are awaiting feedback to devise a way forward.</p>



No information Currently Available



Requires Phase 2 Assessment



Phase 2 Assessment Completed or Underway



Certificate / Statement Issued for Residential Use

SITE	PHASE COMPLETED / DATE	DETAILS (i.e. Summaries, Conclusions, List of Identified Contaminants, Remedial Measures Required)
2 - 22 New Street (titanium oxide factory – vacant)	s53V Completed along with approved Remediation Action Plan s53X to commence early 2015	<p>A report was provided to EAS titled “<i>Environmental Audit (s53V) Report 22 New Street South Kingsville</i>” dated November 2009, prepared by Lane Piper Pty Ltd. A review of the report identified that numerous environmental investigations have been completed at the site over the past 12 years by a number of consulting firms, the most recent of which was presented in 2008.</p> <p>The Section 53V Environmental Audit Report was prepared due to a Clean Up Notice (No. 7358) being issued by the EPA for the site during September 2008. It should be noted that the Audit works did not provide a Certificate/Statement of Environmental Audit to allow for the likely town planning requirements for any proposed residential development.</p> <p>Soil investigations identified contamination in filled areas of the former quarry where low pH values and elevated sulphate concentrations were identified, caused by previous backfilling activities.</p> <p>Groundwater investigations identified groundwater flow systems in the Newer Volcanic basalts and in the underlying the Brighton Group deposits. Groundwater flow from the Newer Volcanics reported a south easterly component of flow; whereas, the Brighton Group aquifer reported a westerly component of flow, towards the former Gilbertsons Abattoir site.</p> <p>Standing water levels ranged between approximately 12 - 16 metres below ground level. The chemical status of the groundwater was characterised by elevated concentrations of total dissolved solids, sulphate, metals (cadmium, copper, lead, nickel and zinc), ammonia, nitrate and fluoride.</p> <p>The Audit provided measures to reduce and manage risks to beneficial uses, which include data management (collation of data in digital format from various consultant reports), groundwater monitoring (development and implementation of a Groundwater Quality Management Plan) and remediation (development of Remediation Action Plan and associated feasibility studies).</p> <p>A Remediation Action Plan was formally endorsed by EPA Licenced Auditor Phillip Hitchcock in April 2011.</p>
<b>WATSON STREET:</b>		
2 Watson Street (Fence construction)	-	Site ownership details pending.

## **Attachment II**

### **Environmental Status Plan**



Figure 22 – Site Remediation Status Plan

## **Attachment III**

### **Land Use Plan**





- P15 Boundary
- Property Boundary
- Property Ownership Boundary
- Mixed Use Area
- Residential
- Residential (Existing Road Reserve - Council Land Swap Opportunity)
- Community Facility
- Open Space\*\*
- Encumbered Open Space
- Landscape Link / Laneway Access
- Railway
- Connector Street
- Access 2 Street \*
- Signalised Intersection
- Roundabout
- Existing Signalised Intersection
- Off Road Bicycle Path
- External Pedestrian and Bicycle Link
- Existing Large Scale Power Lines & Towers

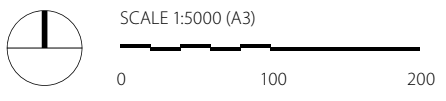
NOTE:

\* Access 2 Streets nominated on the plan are indicative only, subject to future conceptual design investigations and traffic engineering assessment.

\*\* Shape and locations of parks are indicative, subject to detailed concept design development, however they are to be generally in accordance with the requirements of this development plan.

DISCLAIMER:

The Land Use Plan is based on Brown Consulting Feature Level Survey, Reference M140666 Version C, Dated 2/12/14. As per this feature level survey, we note that the position of boundaries and easements shown are only approximate and have been derived from VICMAP digital property data (They have not been verified by this survey). As such, any area calculations are approximate only.



# Land Use Plan - Property Ownership Boundaries

Precinct 15, Altona North