

20 May 2021

To: Jane Kelly, Director, Urbis
From: Simon Chislett, Principal Environmental Engineer, B.Eng (Env) Hons, CEnvP SC (EIANZ), Environmental Management & Consulting Pty Ltd
Site Name: The Mills Valley Estate
Site Address: The Mills Site, New Norfolk, Tasmania

SUBJECT: Addressing the Potentially Contaminated Land Code for Re-zoning Stage 11 Onwards at The Mills Valley Estate Development, New Norfolk, Tasmania

1. INTRODUCTION

Environmental Management and Consulting (EM&C) was engaged by Urbis to provide supporting information for the application to rezone the area for the next stages (Stage 11 onwards) of The Mills Valley Estate Development, located at the corner of Glebe Road and Lyell Highway, New Norfolk, Tasmania (the site), in regards to the Potentially Contaminated Land Code (PCLC) within the Derwent Valley Interim Planning Scheme 2015. The PCLC has been identified to be applicable to part of the site in a Phase 1 Environmental Site Assessment (Phase 1) completed by EM&C in April 2020. The assessment identified a potential former tip and asbestos dump site (Area 17 in Figure 1 below). It was also observed that the site is likely to have been used as a dump site for waste, with old cars and waste spread along one of the access roads and currently used as a dump site for building waste and soil stockpiles.

The site is shown in Figure 1 below, showing its current zoning General Residential, Low Density Residential (LDR) and Rural Living (RL), with the LDR and RL areas proposed to be rezoned to General Residential to be able to house the proposed residential subdivision. It should be noted that the PCLC applies to the proposed subdivision regardless of zoning, and no increased risk from contamination has been identified with the proposed rezoning.

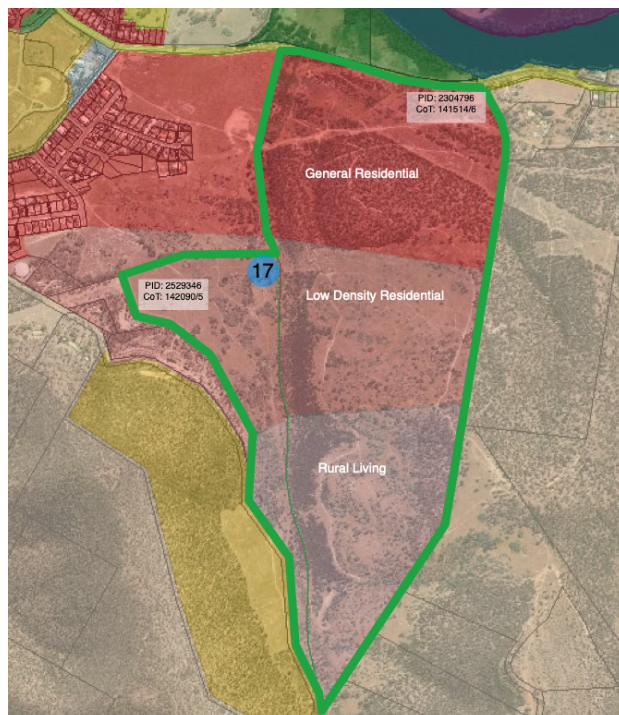


Figure 1. Green outline indicates area of this letter summary report. Blue dot indicate potential location of area of potential concern (APEEC) 17 identified in the Phase 1 ESA.

2. BACKGROUND

In April 2020, EM&C undertook a Phase 1 of the proposed Mills Project Site in order to support the acquisition and future redevelopment of the site. The Phase 1 site and also the now developed areas (Stage 1-6) and the former Derwent Valley Hospital site to the north west. The requirement for the Phase 1 was identified during a development application (DA 89/2005) to support the potential rezoning and subdivision of the area.

The Phase 1 included a site inspection (undertaken by EM&C on 6 April 2020) and a desktop review of the site history and other relevant site data. A number of areas of potential environmental concern (APEC) were identified. One area, APEC 17, (potential former tip and asbestos dump site) is potentially located within the current site. Anecdotal evidence from a 1997 investigation suggested a historic tip was located in this vicinity. No further information could be identified during the Phase 1, however a review of historical aerial photo's of the area identified an access road being present from 1946 and that the area appeared to have had some vehicle movement activity from 1989. A subsequent site inspection did not identify the location of the anecdotally identified historic tip, but it was noted that the area was currently utilised for localised dumping of construction waste from surrounding areas.

The Phase 1 concluded that there was no existing record or finding of actual contamination at the site, which would lead to the site being identified as "contaminated", as defined by the Derwent Valley Interim Planning Scheme 2015, Potentially Contaminated Land Code (PCLC). However, the old tip site, identified as APEC 17, was identified as a potential area of unknown contamination, and potential location of asbestos waste, due to the potential for asbestos within historic building debris.

3. ADDRESSING THE PCLC FOR REZONING

Based on the findings of the Phase 1 for the area shown in Figure 1, and a review of the information relating to the site, EM&C note the following:

- With the exception of APEC 17, which is based on anecdotal evidence, and the dumping of building waste. No other potentially contaminating activities have been identified on the site.
- The exact location of APEC 17 is unknown from the review of site history and historical imagery.
- The area appears to have historically been used as a dumping site for waste, with old cars and waste observed during the site inspection, and it was observed to currently be used for the dumping of construction waste, likely from the surrounding area, but the source of waste has not been confirmed at this stage.

Given the large size of the site and the nature of the identified potential contaminating activity, general dumping of soil and waste, and historically buried waste, on a publicly accessible site completing a Phase 2 ESA to assess potential contamination hotspots is considered to be impractical and is unlikely to identify sites with buried waste with enough certainty to make a statement that the site is suitable for intended use, without a supporting plan to manage contamination.

Therefore, to provide enough supporting information to enable the Tasmanian Planning Commission to approve the rezoning of these areas in regard to the PCLC, a plan for managing contamination is presented in Section 4. This plan aims to address the PCLC under Section E2.6.1 Subdivision under the 'Acceptable Solution' (A1) *For subdivision of land, the Director, or a person approved by the Director for the purpose of this Code:*

- (b) approves a plan to manage contamination and associated risk to human health or the environment, that will ensure the subdivision does not adversely impact on health or the environment and is suitable for its intended use.

4. PLAN FOR MANAGING CONTAMINATION

The following plan for managing contamination has been prepared for implementation with Stage 11 and onwards of The Mills Valley Estate Development, New Norfolk, Tasmania, to ensure that the development does not pose and adverse effect to human health or the environment and will be suitable for intended use.

The plan for managing contamination contains the following steps:

1. Site Walkover Inspections

Prior to commencing earthworks, a site inspection of each staged area (Stage 11 onward) of development should be completed by or under the direction of a CEnvP-SC, certified by EIANZ, and shall include a visual assessment of the land proposed for development for surface dumped waste material, stockpiled waste soil and exposed locations of buried waste.

2. Assessment and Management of Identified Waste Materials with Potential to Contain Hazardous Materials

All identified stockpiles or other identified waste with potential to contain hazardous materials must be assessed for either:

- Suitability for re-use on the site in accordance with the National Environment Protection (Assessment of Site Contamination) Measure (2013 Amendment), National Environmental Protection Council, or
- Removal to a suitably licensed landfill in accordance with the Tasmanian Environment Protection Authority (EPA), Information Bulletin 105: "Environment Management and Pollution Control (Waste Management) Regulations, Classification and Management of Contaminated Soil for Disposal" (IB105).
- Any waste not suitable to remain on site must be disposed off-site to a suitably licensed landfill.
- The ground beneath the stockpile, or waste material, if removed, must be assessed to ensure all waste material has been removed and the area following removal is suitable for the intended use.

All works undertaken in Part 2 of this plan must be supervised or directed by a CEnvP-SC, EIANZ.

3. Assessment and Management of Buried Waste Material and Unexpected Finds with Potential to Contain Hazardous Materials

With buried waste being unlikely to be identified prior to the start of earthworks a "Buried Waste and Unexpected Find" process must be implemented in a Development Environmental Management Plan (EMP). The process must include:

- Induction of personnel to the buried waste and unexpected finds process.
- Definition of "Hazardous Material" as any material that:
 - appear to not be natural soil.
 - contains building waste, e.g. cement sheet, brick, concrete, timber and glass.
 - is odourous.
 - is stained or discoloured.
 - contains oil or fuel products.
 - is suspected to contain asbestos.
 - is placed in a stockpile.
- Initial response plan, including:

- Stop work.
 - Contact person responsible for further action identified in the EMP.
 - Cordon of and make area safe.
- Assessment and management per Step 2 of this plan.

As a Certified Environmental Practitioner Site Contamination Specialist (CEnvP-SC), certified by The Environment Institute of Australia and New Zealand (EIANZ), I (Simon Chislett) have been endorsed by the Director for the purpose of this code to approve the plan to manage contamination, detailed in Section 4 of this letter. Certification seals and certification numbers are provided below.



Certified Environmental Practitioner (CEnvP)
Contaminated Site Specialist (EIANZ)
EIANZ CenvP No: 1160



EIANZ Site Contamination Specialist No: SC400112

Should you wish to discuss these results further, please do not hesitate to contact myself directly.

Regards,

Simon Chislett

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em&c

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STATEMENT OF LIMITATIONS

This report has been prepared in accordance with the scope of services described in the contract or agreement between Environmental Management & Consulting Pty Ltd (EM&C) and the Client. The report relies upon data, surveys, measurements and results taken at or under the particular times and conditions specified herein. Any findings, conclusions or recommendations only apply to the aforementioned circumstances and no greater reliance should be assumed or drawn by the Client. Furthermore, the report has been prepared solely for use by the Client and EM&C accepts no responsibility for its use by other parties. The client agrees that EM&C's report or associated correspondence will not be used or reproduced in full or in part for promotional purposes and cannot be used or relied upon in any prospectus or offering.

No warranties express or implied are made. Subject to the Scope of Work, EM&C's assessment is limited strictly to identifying typical environmental conditions associated with the subject property and does not include evaluation of the structural conditions of any buildings on the subject property or any other issues. Additionally, unless otherwise stated EM&C did not conduct soil, air, wastewater or other matrix analyses including asbestos or perform contaminated sampling of any kind. Nor did EM&C investigate any waste material from the property that may have been disposed of off the site, nor related waste management practices.

The results of this assessment are based upon site inspection conducted by EM&C personnel, information from interviews with people who have knowledge of site conditions and information provided by regulatory agencies. All conclusions and recommendations regarding the property are the professional opinions of the EM&C personnel involved with the project, subject to the qualifications made above.

While normal assessments of data reliability have been made, EM&C assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements from sources outside of EM&C, or developments resulting from situations outside the scope of this project.

EM&C is not engaged in environmental auditing and /or reporting of any kind for the purpose of advertising sales promoting, or endorsement of any clients' interests, including raising investment capital, recommending investment decisions, or other publicity purposes. EM&C assumes no responsibility or liability for errors in any data obtained from regulatory agencies, statements from sources outside of EM&C, or developments resulting from situations outside the scope of this project.

Information relating to soil, groundwater, waste, air or other matrix conditions in this document is considered to be accurate at the date of issue. Surface, subsurface and atmospheric conditions can vary across a particular site or region, which cannot be wholly defined by investigation. As a result, it is unlikely that the results and estimations presented in this report will represent the extremes of conditions within the site that may exist. Subsurface conditions including contaminant concentrations can change in a limited period of time and typically have a high level of spatial heterogeneity.

From a technical perspective, there is a high degree of uncertainty associated with the assessment of subsurface, aquatic and atmospheric environments. They are prone to be heterogeneous, complex environments, in which small subsurface features or changes in geologic conditions or other environmental anomalies can have substantial impact on water, air and chemical movement.

Major uncertainties can also occur with source characterization assessment of chemical fate and transport in the environment, assessment of exposure risks and health effects, and remedial action performance. These factors make uncertainty an inherent feature of potentially impacted sites. Technical uncertainties are characteristically several orders of magnitude greater at impacted sites than for other kinds of projects.

EM&C's professional opinions are based upon its professional judgment, experience, and training. These opinions are also based upon data derived from the limited testing and analysis described in this report. It is possible that additional testing and analysis might produce different results and/or different opinions or other opinions. EM&C has limited its investigation(s) to the scope agreed upon with its client. EM&C believes that its opinions are reasonably supported by the testing and analysis that has been undertaken (if any), and that those opinions have been developed according to the professional standard of care for the environmental consulting profession in this area at this time. Other opinions and interpretations may be possible. That standard of care may change and new methods and practices of exploration, testing and analysis may develop in the future, which might produce different results. EM&C is not in the business of providing legal advice.